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APPLICATION REF
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23 October 2026

**ATTENTION: ASSESSMENT MANAGER**

Development Services
City Planning and Sustainability
Brisbane City Council
GPO Box 1434
BRISBANE QLD 4001

Lodgement: Via BCC Development Assessment Portal

Dear Sir/Madam

**RE: 17, 19, 23, 27 & 31 DOVER STREET, ALBION QLD 4010**
**LOTS 2-5 ON REGISTERED PLAN RP87143 & LOT 2 ON REGISTERED PLAN RP106768**
**PROPOSED CHANGE TO AN EXISTING DEVELOPMENT APPROVAL (MINOR CHANGE)**
**UNDER SECTION 81 OF THE PLANNING ACT 2016**
**BCC FILE REFERENCE NUMBER: A006206019**

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We write on behalf of our client – Dover Albion Pty Ltd – with respect to the existing Development Approval that is attached to the land at 17-31 Dover Street, Albion QLD 4010, more particularly described as Lots 2-5 on Registered Plan RP87143 & Lot 2 Registered Plan RP106768 ("the Subject Site").

Dover Albion Pty Ltd has entered into a contract to purchase the Subject Site and associated Development Approval from the current landowner, with settlement scheduled for August 2027. As part of its due diligence and project delivery strategy, the purchaser proposes to make a number of amendments to the approved development and therefore we seek a Minor Change Approval pursuant to section 81 of the *Planning Act 2016* to formalise these plan and condition amendments.

The objective is to obtain Council approval by early 2027, so as to enable the timely completion of detailed design, building documentation, apartment presales, and construction planning ahead of settlement and commencement of development works in August 2027.

Detailed documentation of the building has now been coordinated with the necessary Building Application consultant team, with architectural, structural and certification inputs now aligned. The proposed amendments represent a logical refinement of the approved design and remain consistent with the development intent previously endorsed by Council. While a number of design modifications are proposed, the overall form, land use outcomes and day to day function of the development remain substantially unchanged.

## APPLICATION HISTORY

**November 2024**

On 28 November 2024, Brisbane City Council issued a Decision Notice under Section 63 of the *Planning Act 2016* approving development application **A006206019** for the following staged development consisting of a total of 191 apartments:

**Stage 1:**

- Material Change of Use (Multiple Dwelling – 97 units) Development Permit

**Stage 2**:

- Material Change of Use (Multiple Dwelling – 94 units) Development Permit

A copy of the current Development Approval package is enclosed as **Attachment F**.

The Development Permit remains current until **27 February 2031**.

## PROPOSED CHANGES

The key amendment to the approved architectural plans involves the internal refinement of apartment layouts and dwelling mix across both residential towers. Importantly, all changes made are designed to be generally contained within the previously approved building envelope, with no significant alterations proposed to the building height, footprint, or overall built form.

The revised design reconfigures a number of typical floor plates to optimise the internal layout and increase the overall residential yield from the previously approved 191 apartments to 203 apartments. This increase is achieved through a redistribution of dwelling types, involving an increase in the number of 2-bedroom apartments and a corresponding reduction in the number of 3-bedroom apartments within the development.

A comparison between the approved apartment mix and the proposed apartment mix is provided in the table below.

| **Current Approval – H4382DOV – Issue F/H<br>BCC Application Ref: A006206019** | | **Current Proposal Plans – H4629NOR – Issue C** | |
|---|---|---|---|
| Unit Type | No. of Units | Unit Type | No. of Units |
| 1-Bedroom Unit | 34 Units | 1-Bedroom Unit | 34 Units |
| 2-Bedroom Unit | 113 Units | 2-Bedroom Unit | 145 Units |
| 3-Bedroom Unit | 41 Units | 3-Bedroom Unit | 21 Units |
| 4-Bedroom Unit | 3 Units | 4-Bedroom Unit | 3 Units |
| **Total** | **191 Units** | **Total** | **203 Units** |

**Plate 1:** Comparison analysis approved versus proposed apartment yield.

The additional apartments sought represents a modest increase of 6.28% in total dwelling yield which will be adequately serviced by the provision of on-site resident and visitor parking within a two-level basement car park comprising a total of 321 spaces, including 51 visitor parking spaces.

As part of this amendment to the current Development Permit, we are seeking to retain the current approved staging and adjusted to reflect the updated apartment yield as follows:

**Stage 1:**

- Material Change of Use (Multiple Dwelling – 97 units) Development Permit

**Stage 2**:

- Material Change of Use (Multiple Dwelling – 106 units) Development Permit

Of note, the current approved staging permitted construction of the basement carpark over 2 separate stages. The revised staging will see the construction of the entire basement in Stage 1 and completion of the south tower.

**

A recently adopted amendment to the planning scheme *(City Plan 2014 – Version 37.0 – September 2026),* introduced reduced car parking rates for Multiple dwelling sites located within 400m walking distance of a 'key location'. The amended rate applies to land within 400m walking distance of:

a. a dedicated public pedestrian access point of a major public transport interchange;
b. a public transport stop serviced at a minimum frequency of 20 minutes between 7am and 7pm on weekdays and 30 minutes between 7am and 7pm on weekends; or
c. a Principal centre, Major centre, District centre, or Mixed use zone.

Based on the mapping below, we have determined that the site is located within 400m of a qualifying key location area, being approximately 348m walking distance to the Mixed Use zone on Sandgate Road.

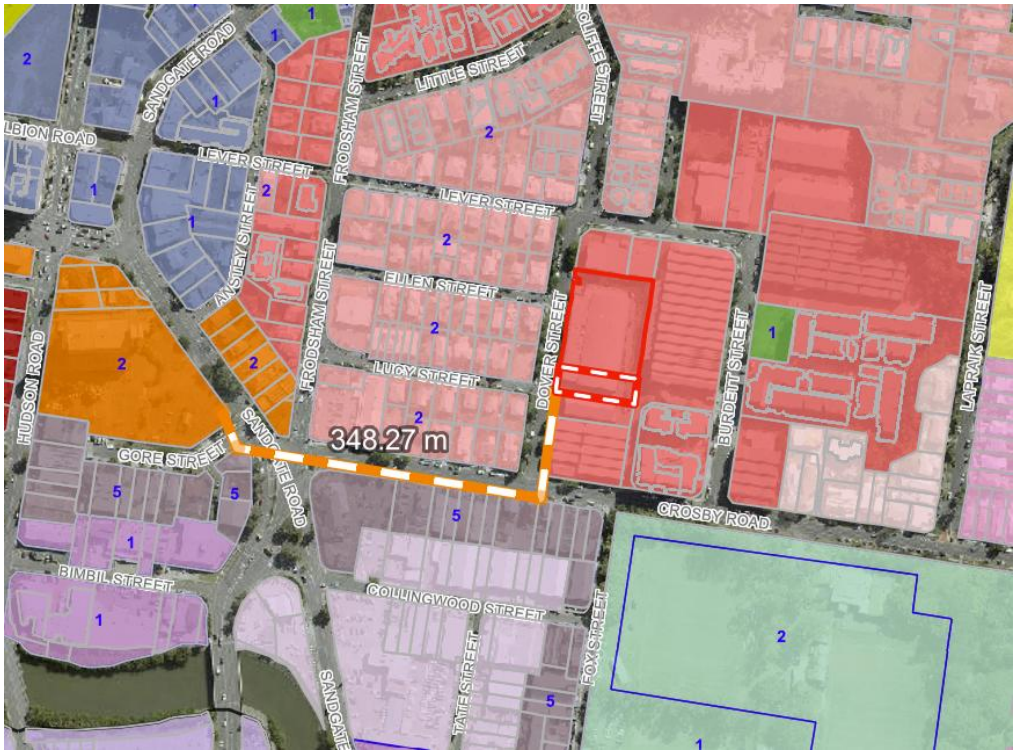



**Plate 2:** Subject Site in red outlined and walking distance proximity to Mixed Use Centre along Sandgate Road.

The current development approval (BCC Ref: A006206019) relied upon a shortfall of 78 on-site car spaces, whereas under the amended Council key location area ratio, the current proposal results in a surplus of 21 spaces.

A car parking allocation summary comparing the approved unit yield and parking allocation rate against the current proposed unit yield and allocation rate is provided below for ease of reference:

**Approved Unit Mix and Car Parking Rate – City Plan 2014 – Version 33.0 (191 Units Total)**

| Unit Type | No. of Units | BCC TAPS Parking Rate Requirement | Required Car Spaces | Provided Car Spaces |
|---|---|---|---|---|
| 1-Bedroom Unit | 34 Units | 1 Car Space per Unit | 34 | |
| 2-Bedroom Unit | 113 Units | 2 Car Spaces per Unit | 226 | |
| 3-Bedroom Unit | 41 Units | 2 Car Spaces per Unit | 82 | |
| 4-Bedroom Unit | 3 Units | 2.5 Car Spaces per Unit | 7.5 (8) | 267 |
| Visitors | 191 Units | 0.25 Car Spaces per Unit | 47.75 (48) | 53* |
| **Total** | **191 Units** | | **398 Car Spaces** | **320 Car Spaces (*inclusive of 53 Visitor Spaces)** |

**Car Parking Shortfall – 78 Car Spaces**

**Proposed Unit Mix and Car Parking Rate (Key Location) – City Plan 2014 – Version 37.0 (203 Units Total)**

| Unit Type | No. of Units | BCC TAPS Parking Rate Requirement | Required Car Spaces | Provided Car Spaces |
|---|---|---|---|---|
| 1-Bedroom Unit | 34 Units | 1 Car Space per Unit | 34 | |
| 2-Bedroom Unit | 145 Units | 1.2 Car Spaces per Unit | 174 | |
| 3-Bedroom Unit | 21 Units | 1.6 Car Spaces per Unit | 33.6 (34) | |
| 4-Bedroom Unit | 3 Units | 2 Car Spaces per Unit | 6 | 269 |
| Visitors | 203 Units | 0.25 Car Spaces per Unit | 50.75 (51) | 51* |
| **Total** | **203 Units** | | **299 Car Spaces** | **321 Car Spaces (*inclusive of 51 Visitor Spaces)** |

**Car Parking Surplus – 22 Car Spaces**

**Table 1:** On-site car parking allocation rate comparison table.

Other key changes sought to the approved plans are summarised as follows:

**Site Cover**
Site cover has increased from 50.0% to 52.3% of the site area. This minor increase is attributable to the enlargement of the roof structure over the communal recreation area at Ground Floor, which provides additional weather protection and improved amenity outcomes for future residents.

**Communal Recreation Area**
Communal open space has increased from 29.0% to 30.4% of the site area in association with the updated Ground Floor layout and revised amenities. The amended design provides enhanced communal facilities and improved shared spaces for future residents.

**Containerised Planters**
A reduction in containerised planters is proposed on upper-level balconies (Levels 3-6) to accommodate the revised apartment floor plan configuration and amended apartment yield mix. Notwithstanding this change, there is no reduction or amendment proposed to the previously approved deep planting areas provided throughout the site.

**Resident Car Parking Spaces**
One (1) resident car parking space within Basement 1 has been removed to facilitate the provision of additional building services infrastructure. Notwithstanding this reduction, the proposed development continues to provide a surplus of on-site car parking spaces when assessed against the requirements of City Plan 2014 (*Version 37.0 – September 2026*), as discussed previously.

**Bicycle Parking**
Additional bicycle parking facilities are proposed to reflect the increased apartment yield. A total of 254 bicycle parking spaces, including 51 visitor bicycle spaces, are now provided on-site.

**Shared Parking Bay and Electric Scooter Charging Bay**
The previously approved shared parking bay within Basement 1 and the electric scooter charging bay located adjacent to the Dover Street driveway crossover have been removed. These facilities were originally provided as supporting measures to justify a shortfall in on-site car parking provision. As outlined previously, the amended proposal now achieves a surplus of 20 car parking spaces, having regard to the site's location within a key location area under City Plan 2014 (*Version 37.0 – September 2026*), and therefore these additional measures are no longer required.

**

The vast majority of the proposed changes are contained wholly within the building envelope, including building height and setbacks, approved under Development Approval **A006206019**. To the extent that minor variations to the approved building envelope are proposed, these are clearly illustrated on the amended floor plans and elevations, which include the approved building envelope outlined in red for comparison purposes. These variations are modest in nature and do not materially alter the type, scale, or overall built form of the development previously approved.

A complete copy of all proposed changes are illustrated and annotated on the revised Architectural Proposal Plans prepared by HAL Architects Pty Ltd – **H5138DOV-TP1.002-TP1.504-Issue C** enclosed as **Attachment B**.
A detailed summary of changes is provided in the table below:

| FLOOR/LEVEL | DRAWING NUMBER | DETAILS OF CHANGE |
|---|---|---|
| **Development Summary Stats** | **TP1.002** | a. MC01 – Updated key development statistics as indicated. |
| **Development Summary Stats** | **TP1.003** | b. MC01 – Updated key development statistics as indicated. |
| **Context Plan** | **TP1.004** | c. No change. |
| **Site Plan** | **TP1.101** | d. No change. |
| **Basement 2** | **TP1.201** | e. MC02 – Increased basement footprint to match extent of excavation and car park layout of Basement 1. |
| **Basement 1** | **TP1.202** | f. MC13 – Removed 1 car parking space to accommodate mechanical plant room.<br>g. MC17 – Removed shared parking bay. |
| **Ground Floor** | **TP1.203** | h. MC05 – Revised pavilion design in communal recreation area.<br>i. MC06 – External wall extended.<br>j. MC07 – Straightened curved walls.<br>k. MC08 – Crossover width updated to 9.5m wide.<br>l. MC15 – Removed electric scooter charging bay.<br>m. MC16 – Provision of additional bicycle parking.<br>n. MC18 – Bicycle store relocated.<br>o. MC19 – Building entry/lobby area design updated. |
| **Level 2** | **TP1.204** | p. MC05 – Revised pavilion design in communal recreation area.<br>q. MC06 – External wall extended.<br>r. MC07 – Straightened curved walls.<br>s. MC09 – Removed planter and straightened curve.<br>t. MC20 – Windows removed from façade. |
| **Level 3** | **TP1.205** | u. MC06 – External wall extended.<br>v. MC09 – Removed planter and straightened curve.<br>w. MC10 – Removed planter.<br>x. MC20 – Windows removed from façade. |
| **Level 4** | **TP1.206** | y. MC06 – External wall extended.<br>z. MC09 – Removed planter and straightened curve.<br>aa. MC10 – Removed planter.<br>bb. MC20 – Windows removed from façade. |
| **Level 5** | **TP1.207** | cc. MC06 – External wall extended.<br>dd. MC09 – Removed planter and straightened curve. |

| | | |
|---|---|---|
| | | ee. MC10 – Removed planter.<br>ff. MC20 – Windows removed from façade. |
| **Level 6** | **TP1.208** | gg. MC02 – Reduced building setback to front property boundary.<br>hh. MC09 – Removed planter and straightened curved walls.<br>ii. MC10 – Removed planter.<br>jj. MC11 – Removed landscape bridge.<br>kk. MC12 – Introduction of revised unit type. |
| **Level 7 – 9** | **TP1.209** | ll. MC02 – Reduced building setback to front property boundary.<br>mm. MC09 – Removed planter and straightened curved walls.<br>nn. MC10 – Removed planter.<br>oo. MC12 – Introduction of revised unit type. |
| **Level 10** | **TP1.212** | pp. MC10 – Removed planter.<br>qq. MC14 – Extended slab edge.<br>rr. MC21 – Roof terrace design/floor plan layout updated. |
| **Roof** | **TP1.213** | ss. No change. |
| **West Elevation** | **TP1.401** | tt. MC11 – Removed landscape bridge.<br>uu. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **North Elevation** | **TP1.402** | vv. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **East Elevation** | **TP1.403** | ww. MC11 – Removed landscape bridge.<br>xx. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **South Elevation** | **TP1.404** | yy. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **Internal North Elevation** | **TP1.405** | zz. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **Internal South Elevation** | **TP1.406** | aaa. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **West Elevation Comparison** | **TP1.407** | bbb. MC11 – Removed landscape bridge. |
| **Section A** | **TP1.501** | ccc. MC12 – Introduction of revised unit type.<br>ddd. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |

| | | |
|---|---|---|
| **Section B** | **TP1.502** | eee. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **Section C** | **TP1.503** | fff. MC11 – Removed landscape bridge.<br>ggg. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **Section D** | **TP1.504** | hhh. MC11 – Removed landscape bridge.<br>iii. Inclusion of visual screening element on roof top to obscure air conditioning condensers. |
| **Section J** | **TP1.503** | jjj. No change. |
| **Sections E, F, G, & H (Setback Analysis)** | **TP1.504** | kkk. No change. |

***Table 1:*** *Detailed summary of proposed changes to the approved development*

## REFERRAL AGENCIES

No SARA referral trigger.

## STATUTORY REQUIREMENTS - MINOR CHANGE TEST

As defined in Schedule 2 of the *Planning Act 2016,* a 'minor change' means a change that –

*(b) for a development approval –*
- *(i) would not result in substantially different development; and*
- *(ii) if a development application for the development, including the change, were made when the change application is made would not cause—*
  - *(A) the inclusion of prohibited development in the application; or*
  - *(B) referral to a referral agency, other than to the chief executive, if there were no referral agencies for the development application; or*
  - *(C) referral to extra referral agencies, other than to the chief executive; or*
  - *(D) a referral agency to assess the application against, or have regard to, matters prescribed by regulation under section 55(2), other than matters the referral agency must have assessed the application against, or have had regard to, when the application was made; or*
  - *(E) public notification if public notification was not required for the development application.*

An assessment of the proposed changes against the minor change provisions is provided below:

*(i) would not result in a substantially different development*

Schedule 1 of the *Development Assessment Rules (DA Rules)* outlines what changes may be considered to result in a substantially different development. These examples are assessed against the proposal in **Table 2** below:

| DEVELOPMENT ASSESSMENT RULES - SCHEDULE 1 'SUBSTANTIALLY DIFFERENT DEVELOPMENT' | COMMENT |
|---|---|
| *a. Involves a new use.* | Not applicable. No new use is proposed. |
| *b. Results in the application applying to a new parcel of land.* | Not applicable. The amended application does not apply to a new parcel of land. |
| *c. Dramatically changes the built form in terms of scale, bulk and appearance.* | The vast majority of the proposed changes are contained wholly within the building envelope, including building height and setbacks, approved under Development Approval **A006206019**. To the extent that minor variations to the approved building envelope are proposed, these are clearly illustrated on the amended floor plans and elevations, which include the approved building envelope outlined in red for comparison purposes. These variations are modest in nature and do not materially alter the type, scale, or overall built form of the development previously approved.<br><br>The inclusion of visual screening element on roof top to obscure air conditioning condensers is proposed and is not readily visible from the street or various vantage points of note outlined in the Albion Neighbourhood Plan – refer to View Study Comparison – Approved vs Proposed enclosed as **Attachment G**. |
| *d. Changes the ability of the proposed development to operate as intended.* | The proposed changes do not prevent the ability of the proposal to operate as intended. |
| *e. Removes the component that is integral to the operation of the development.* | No integral component of the building has been removed that will impede the operation of the building. |
| *f. Significantly impacts on traffic flow and the transport network, such as increasing traffic to the site.* | The vehicular crossover and general car parking layout have been maintained in accordance with the original approval and as per the *TAPS PSP*. Significant impacts on traffic flow and the transport network, such as increasing traffic to the site will not result on account of the proposed change sought. |

| | |
|---|---|
| | The additional apartments sought represents a modest increase of 6.28% in total dwelling yield which will be adequately serviced by the provision of on-site resident and visitor parking within a two-level basement car park comprising a total of 321spaces, including 51 visitor parking spaces. Please refer to Traffic Impact Assessment prepared by Q Traffic Engineering Consultants (RPEQ) enclosed as **Attachment E**. |
| *g. Introduces new impacts or increase the severity of known impacts.* | The proposed minor amendments to the architectural plans will not introduce new impacts or increase severity of known impacts. |
| *h. Removes an incentive or offset component that would have balanced a negative impact of the development.* | Not applicable. It is not proposed to remove any incentive or offset components. |
| *i. Impacts on infrastructure provisions.* | There will not be significant impacts on infrastructure provision, location or demand as a result of the proposed amendments. The additional apartments sought represents a modest increase of 6.28% in total dwelling yield and the additional demand reflected by way of issue of an amended ICN as part of the minor change application process. |

***Table 2:*** *Assessment of amended architectural plans against Schedule 1 of the Development Assessment Rules (DA Rules).*

Taking into account the definition of a substantially different development, the above table confirms the changes to the architectural plans do not result in a substantially different development.

*(ii) if a development application for the development, including the change, were made when the change application is made would not cause—*
*(A) the inclusion of prohibited development in the application; or*

The proposed changes to the architectural plans do not constitute or include prohibited development.

*(B) referral to a referral agency, other than to the chief executive, if there were no referral agencies for the development application; or*
*(C) referral to extra referral agencies, other than to the chief executive; or*
*(D) a referral agency to assess the application against, or have regard to, matters prescribed by regulation under section 55(2), other than matters the referral agency must have assessed the application against, or have had regard to, when the application was made; or*

The proposed changes to the architectural plans do not require referral to an additional/extra referral agency.

> *(E) public notification if public notification was not required for the development application.*

When initially lodged, the application was subject to Impact Assessable procedures and was assessed against the relevant provisions of the *Brisbane City Plan 2014*. The proposed changes do not alter the category of development and assessment.

## SUPPORTING INFORMATION

Please find enclosed the following documents in support of this meeting request:

- DA Form 5;
- Current Title Search;
- **Attachment A:** Landowners Consent Form;
- **Attachment B:** Amended Architectural Proposal Plans **(H5138DOV-TP1.002-TP1.504-Issue C)** prepared by HAL Architects;
- **Attachment C:** Amended Landscape Concept Plan prepared by HAL Landscape Architects;
- **Attachment D:** Amended Civil Engineering Drawings prepared by Civil Works Engineers (RPEQ);
- **Attachment E:** Traffic Impact Assessment prepared by Q Traffic Engineering Consultants (RPEQ); &
- **Attachment F:** Current BCC Development Approval (BCC Ref: **A006206019**).
- **Attachment G:** View Study Comparison – Approved vs Proposed prepared by HAL Architects.

As per the Brisbane City Council Development Assessment Fees 2026–27, we understand a fee of **$4,800.00** applies. As the application is being submitted electronically, we kindly request that Council issue a fee quote made payable to Dover Albion Pty Ltd.

We submit that the proposed amendments to the proposal plans are consistent with the definition of a minor change under the *Planning Act 2016* and are capable of Council support.

Should you have any questions or require further clarification prior to the prelodgement meeting, please do not hesitate to contact our office.



Kind Regards,

**Adam Lockhart**
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**Director – Town Planning**

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