



# PLANNING ASSESSMENT REPORT

29 – 43 Raffles Street, Mount Gravatt East  
Lots 7-9 on RP13380 & Lot 100 on SP281409

CHANGE APPLICATION (SECTION 82) INVOLVING  
MATERIAL CHANGE OF USE FOR MULTIPLE DWELLING

IMPACT ASSESSMENT

## PLANNING ASSESSMENT REPORT

**Applicant name:** 39 Raffles street investments Pty. Ltd.  
**Site address:** 29 – 43 Raffles Street, Mount Gravatt East  
**Real property description:** Lots 7-9 on RP13380 & Lot 100 on SP281409

**Project reference no:** 0130

**Contact:** David Zanker  
Director  
Blume Planning and Development Pty Ltd

**Proposal:** Other Change application (section 82) for a Material Change of Use for Multiple Dwellings

### Report version:

Version	Prepared By	Reviewed By
Draft	DZ	DZ
Final	DZ	DZ

### Report distribution:

Version	Recipients
Final	Brisbane City Council
Final	39 Raffles street investments Pty. Ltd.

## Contents

1.0	Executive Summary .....	4
2.0	Project Summary .....	5
3.0	Site Details.....	6
3.1	Site History.....	7
3.2	Location .....	8
3.3	Site Characteristics.....	8
4.0	Proposed Changes.....	9
4.1	Overview of Proposed Changes .....	11
5.0	Amendments to Current Approval.....	12
6.0	Town Planning Framework.....	12
6.1	State Government .....	12
6.1.1	Planning Act 2016 – Framework.....	12
6.1.2	State Planning Policies.....	14
6.1.3	Referral Agency .....	14
6.1.4	State Development Assessment Provisions.....	14
6.1.5	South East Queensland Regional Plan.....	14
6.2	Local Government .....	15
6.2.1	Definition (Brisbane City Plan 2014) .....	15
6.2.2	Level of Assessment.....	15
6.2.3	Strategic Framework .....	15
6.2.4	Applicable Codes .....	16
7.0	Performance Planning .....	17
8.0	Relevant Matters.....	19
9.0	Conclusions.....	22

## 1.0 Executive Summary

This report is submitted on behalf of 39 Raffles street investments Pty. Ltd. in support of the Change Application under section 78 and section 82 of the Planning Act 2016 seeking an Other Change for a material change of use for Multiple Dwellings over land at 29 – 43 Raffles Street, Mount Gravatt East, formally described as Lots 7-9 on RP13380 and Lot 100 on SP281409.

The report addresses all relevant town planning requirements associated with regard to the provisions of the *Brisbane City Council Planning Scheme* and the application will be assessed in accordance with the provision of the *Planning Act 2016*.

Under the *Brisbane City Plan 2014*, the subject site is identified as being contained within the Medium density residential zone and is further mapped within the Mt Gravatt central medium density residential sub-precinct (NPP-002c) of the Mt Gravatt central precinct (NPP-002) of the Mt Gravatt corridor neighbourhood plan.

The site remains rectangular in shape with a total site area of 2,327m<sup>2</sup> and a frontage to Raffles Street of 53m. Currently the site comprises 4 dwelling houses on separate land parcels (which have recently been demolished). Each land parcel contains sparse vegetation. The site immediately adjoins a large District centre zoned landholding to the rear (which forms part of a wider district centre along Logan and Creek Roads).

On 28 August 2013, Brisbane City Council approved a development application for a multiple dwelling to be carried out across two stages, 21 units for Stage 1 and 19 units for Stage 2 (A003622967). Stage 1 was ultimately delivered in full, with the delivery of Stage 2 being halted. Upon the delivery of Stage 1, an additional three land parcels were acquired by the previous developer, prior to on selling the land associated with stage 2 and the three extra land parcels (39-43 Raffles Street) to the current Applicant.

On 22 June 2018, a development application was approved by council for a multiple dwelling (75 units) was granted over 29-43 Raffles Street. The approval allowed for a maximum height limit of 6 storeys (A004512546). The development approval was extended by way of agreement on 28 June 2024 (A006522542) and remains current through to 22 June 2026.

The proposed change seeks to amend the approved development to increase the overall number of units (to 112 units) as well as the overall building height to 10 storeys. The proposed change also seeks to provide 2 levels of basement car parking as well as 1 level of at ground car parking with direct access from Raffles Street.

The proposed change to the current approval provides an opportunity to deliver much needed housing on a site that is well located in proximity to various forms of amenity and is well serviced by public transport

Of significant importance is the Applicant's expertise and innovative business model, which leverages modular design and construction techniques to enable the project's completion in as little as nine (9) months following the finishing of basement levels. This accelerated timeline offers a compelling incentive for Brisbane City Council to support the proposed development, reflecting industry-leading construction efficiencies. Such rapid delivery is especially critical amid the urgent need for increased housing supply. Innovative approaches like this represent a meaningful step toward alleviating ongoing housing pressures in the years ahead across not only the city or the state, but nationally.

This Town Planning Report and supporting documents, have assessed the proposed development against the relevant provisions of the Planning Scheme and other relevant legislation. We are of the opinion that the development is consistent with the performance outcomes of the Brisbane City Plan 2014 and is appropriate for the locality. It is recommended that the development application be approved, subject to relevant and reasonable conditions.

## 2.0 Project Summary

Site summary and project details	
Applicant	39 Raffles street investments Pty. Ltd.
Site Address	29 – 43 Raffles Street, Mount Gravatt East, 4122
Real Property Description	Lots 7-9 on RP13380 and Lot 100 on SP281409.
Area Of Site	2,327m <sup>2</sup>
Local Government Area	Brisbane City Council
Planning Scheme	Brisbane City Plan 2014
Zoning	Medium density residential zone
Local Plan	Mt Gravatt corridor neighbourhood plan. <ul style="list-style-type: none"> <li>- Mt Gravatt central precinct (NPP-002)</li> <li>- Mt Gravatt central medium density residential sub-precinct (NPP-002c);</li> </ul>
Overlays	<ul style="list-style-type: none"> <li>- Airport environs overlay</li> <li>- Community purposes network overlay</li> <li>- Critical infrastructure and movement network overlay</li> <li>- Dwelling house charter overlay</li> <li>- Road hierarchy overlay</li> <li>- Streetscape hierarchy overlay</li> <li>- Transport noise corridor overlay</li> </ul>
Proposal	Other Change application (section 82) for a material change of use involving multiple dwellings
Level Of Assessment	Impact assessable
Prelodgement History	Not applicable
Public Notification	10 business days
Referral Agencies	Not applicable

Specialist Reports Provided	Attachment A – Proposal Plans by Shelta Co Attachment B – Traffic impact assessment report prepared by Bana Engineering Attachment C – Civil Plan prepared by Hurley consulting
Contact Email	david@blumeplanning.com

### 3.0 Site Details

The subject site is located at 29 – 43 Raffles Street, Mount Gravatt East, 4122, formally described as Lots 7-9 on RP13380 and Lot 100 on SP281409. The site is identified as a 4 separate land parcels, with a site area of 2,327m<sup>2</sup> and a frontage to Raffles Street of 5m.



Figure 1: Site aerial – QLD Globe

### 3.1 Site History

The site previously formed a multi-staged development approval which sought to deliver 40 units across two different buildings to be delivered in two stages.

On 28 August 2013, Brisbane City Council approved a development application for a multiple dwelling to be delivered in two stages—comprising 21 units in Stage 1 and 19 units in Stage 2 (A003622967). Stage 1 was completed in full, while the delivery of Stage 2 was discontinued. Following the completion of Stage 1, the previous developer acquired an additional three land parcels before selling the land associated with Stage 2, along with the additional parcels (39–43 Raffles Street), to the current Applicant.

On 22 June 2018, Council approved a new development application for a multiple dwelling comprising 75 units across 29–43 Raffles Street. This approval (A004512546) permitted a maximum building height of six storeys. The development approval was subsequently extended by agreement on 28 June 2024 (A006522542) and remains current until 22 June 2026.

This latest approval forms the basis of this change application. The approval includes the following areas:

Figure 2 below shows the approved site layout:



Figure 2: Approved site layout (A004512546)

### 3.2 Location

Under the Brisbane City Council Planning Scheme 2014, the site is identified within the Medium density residential zone. The site adjoins a District Centre to the west and multiple dwelling to the north and dwelling houses to the south. The site adjoins Raffles Street to the east.



Figure 3: Zoning map

The site is also within the Mt Gravatt central medium density residential sub-precinct (NPP-002c) of the Mt Gravatt central precinct (NPP-002) of the Mt Gravatt corridor neighbourhood plan. The purpose of the neighbourhood plan and precinct is to concentrate higher density mixed use development within core sub-precincts, which create the heart of each activity centre. Each is supported by a mixed-use frame sub-precinct with a lesser intensity of development. Adjacent residential sub-precincts support the development of transit-oriented communities, while scaling down to the surrounding lower density urban areas.

The site also sits on the fringe of a future growth node identified within the Selected Growth Nodes of Key Transport Corridors Strategic Framework Map. The proposal provides for much needed housing in a location that is identified for higher density development given its colocation with the large District centre, and proximity to the future growth node.

### 3.3 Site Characteristics

#### Vegetation

Parts of the site are occupied by trees and vegetation. A review of Brisbane City Council's interactive mapping and NALL Mapping identifies there is no ecological value on the site.

#### Current Use

The site was previously occupied by dwelling houses. These houses have recently been demolished in accordance with the existing development approvals over the land.

#### Topography

The site has a moderate slope from RL58m AHD in the north eastern corner at Raffles Street to RL46m AHD in the south western corner.

#### Infrastructure

The site is located within an urban area with access to all necessary services including electricity, telecommunications, transport, water, sewer and stormwater.

#### Overlays

The site is subject to the following overlays under the planning scheme mapping:

- Airport environs overlay
- Community purposes network overlay
- Critical infrastructure and movement network overlay
- Dwelling house charter overlay
- Road hierarchy overlay
- Streetscape hierarchy overlay
- Transport noise corridor overlay

These overlays have been addressed in the Code Assessment and remain non-restrictive to the proposal attached to this report.

## 4.0 Proposed Changes

The proposal seeks approval for a Change Application under section 78 and section 82 of the Planning Act 2016 seeking an Other Change for a material change of use for Multiple Dwelling (112 units). The proposal seeks to change the approved building height from 6 storeys to 10 storeys, as well as a communal rooftop area.

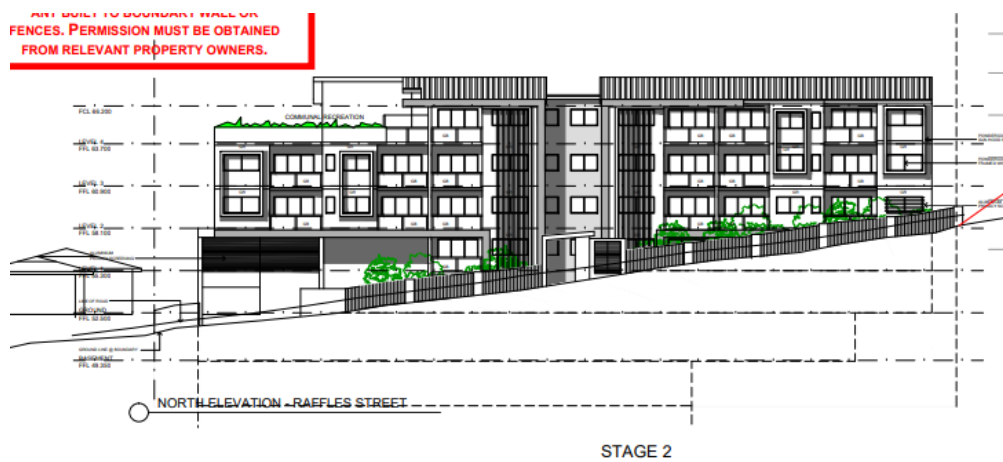


Figure 4: Approved Front Elevation



Figure 5: Proposed Front Elevation

The following table sets out the key approved and proposed design parameters:

Component	Approval	Proposal	Compliance
<b>Land Use</b>	Multiple Dwelling	Multiple Dwelling	✓
<b>Number of Units</b>	75	112	✓
<b>Building height</b>	6 storeys	10 storeys	PO
<b>Front setback (north)</b>	6m	6m	✓
<b>Rear setback (south)</b>	6.77m	6.9m	✓
<b>Side setback (east)</b>	4m	4.1m	✓
<b>Side setback (west)</b>	1.64m	1.7m	PO
<b>Site cover</b>	63%	68%	PO

<b>Landscaping</b>	20% deep planting	11.5% deep planting	✓
<b>Private open space</b>	12-13m <sup>2</sup>	4-9m <sup>2</sup>	PO
<b>Communal open space</b>	301m <sup>2</sup>	1,434m <sup>2</sup>	✓
<b>Car parking</b>	93 spaces	126 spaces and 26 motorcycle	✓
<b>Access</b>	Raffles Street	Raffles Street	✓

#### 4.1 Overview of Proposed Changes

This application seeks a Change 'Other' to amend the existing development approval (A004512546), originally approved on 22 June 2018 and extended until 22 June 2026 (A006522542). The revised proposal maintains the approved residential use but incorporates key updates to enhance delivery efficiency, improve design outcomes, and respond to evolving market demand and housing needs.

The amended proposal continues as a Build-to-Sell scheme but introduces modular construction methods to significantly accelerate construction timeframes, reduce on site disruption, and ensure a high quality, sustainable build. The adoption of modular technology is critical to meeting current market demands for more timely delivery of housing product, particularly in well located urban areas experiencing the ongoing housing supply pressures.

##### **Key changes include:**

- An increase in overall building height from 6 storeys to 10 storeys, plus a communal rooftop area maximising the site's potential and aligning with surrounding urban density.
- A refined architectural design language, evolving from the original approval to deliver a more contemporary and sustainable built form. The revised scheme embraces a modern material palette, improved façade articulation, deep recesses complemented by an external trellis-like structure, to reduce visual bulk and create a strong sense of verticality and rhythm in the architecture of the building.
- Incorporation of a landscaped communal rooftop, reflecting strong sustainability principles and aligning with subtropical design guidelines.
- Adaptation of the unit mix and layout to align with current buyer expectations and market conditions while maximising modular construction efficiency.

##### **Summary of main amendments:**

- Increased building height: from 6 storeys to 10 storeys, plus a communal rooftop space.
- Modernised architectural identity with improved sustainability, articulation, and design detail.
- Retention of the Build-to-Sell model, supported by offsite manufacturing techniques to fast track delivery.
- Addition of 21 units, bringing the total to 112 dwellings, directly addressing critical housing demand.
- Adjusted car parking configuration to support the revised unit and bedroom mix.
- Enhanced resident amenity, including a new expansive communal rooftop with pool facilities as well as communal terraces, landscaping and amenities.

Ultimately, the proposed change enhances the project's economic viability, urban responsiveness, and delivery efficiency, while providing a future forward design that better reflects the expectations of modern residents and the local community. The shift to modular construction plays a vital role in enabling these outcomes supporting streamlined delivery, high quality control, and timely release of much needed housing product to the market.



Figure 6: Perspective

## 5.0 Amendments to Current Approval

As a result of the abovementioned changes, the current development approval is required to be amended, including the approved documents and conditions contained within Brisbane City Council's decision noticed and approval package (A004512546) dated 22 June 2018 and subsequently extended until 22 June 2026 (A006522542). Due to the nature of the proposed changes, it is requested that the development approval conditions are updated to reflect the revised architectural plans and other management plans provided as part of this change application.

## 6.0 Town Planning Framework

### 6.1 State Government

#### 6.1.1 Planning Act 2016 – Framework

Under Section 78 of the *Planning Act 2016*, a person may make an application (a change application) to the responsible entity to change a development approval. A change application, other than for a minor change to a Development permit is an Other change.

Section 82 of the *Planning Act 2016* sets out the provisions for assessing and deciding applications for an Other change as follows:

- (1) This section applies to a change application, other than for a minor change to a development approval.
- (2) For administering the change application, and assessing and deciding the change application **in the context of the development approval**, the relevant provisions apply—
  - (a) as if—
    - (i) the responsible entity were the assessment manager; and
    - (ii) the change application were the original development application, with the changes included, but was made when the change application was made; and
  - (b) with necessary changes.
- (3) However—
  - (a) section 53 does not apply to the change application if the change is not a minor change only because the change may cause—
    - (i) a referral to a referral agency if there were no referral agencies for the development application; or
    - (ii) a referral to extra referral agencies; or
    - (iii) a referral agency to assess the change application against extra matters; and
  - (b) the power—
    - (i) to direct that a development condition be imposed under section 56(1)(b)(i) includes a power to direct that a development condition be amended; and
    - (ii) to impose a development condition under section 60(2)(c) or (3)(b) or 64(6)(b) includes a power to amend a development condition; and
  - (c) if the responsible entity is, under section 78A(3), the Minister—
    - (i) the relevant provisions apply to the change application only if, and to the extent, those provisions would apply to a development application called in by the Minister; and
    - (ii) section 105(5) and (6) applies for assessing and deciding the change application.
- (4) To remove any doubt, it is declared that the following matters apply, only to the extent the matters are relevant to assessing and deciding the change application **in the context of the development approval**—
  - (a) the assessment benchmarks;
  - (b) any matters a referral agency must, may, or may only assess the application against or have regard to under section 55(2);
  - (c) if the development to which the change application relates requires code assessment—any matters the assessment must be carried out having regard to under section 45(3)(b);

- (d) if the development to which the change application relates requires impact assessment— any matters the assessment must or may be carried out against or having regard to under section 45(5)(a)(ii) or (b).
- (5) If a change application is made within 1 year after the development approval was given, any properly made submission for the application for the development approval is taken to be a properly made submission for the change application.
- (6) In this section—  
relevant provisions means—
  - (a) section 45(6) to (8); and
  - (b) part 2, division 2, other than section 51; and
  - (c) part 3, other than sections 63 and 64(8)(c); and
  - (d) the development assessment rules.

As outlined above, an application for an Other change is to be assessed and decided ‘in the context of the development approval’ and the relevant provisions apply as if the change application were the original development application, with the changes included, but was made when the change application was made. Additionally, only the matters for assessment that are relevant to assessing the change in the context of the original approval are relevant for the assessment.

#### 6.1.2 State Planning Policies

Part E of the State Planning Policy outlines the State interest policies and assessment benchmarks. These policies and assessment benchmarks are applicable to the assessment of development applications to the extent that the new State Planning Policy has not been identified in a Planning Scheme as being appropriately integrated.

The State Planning Policy is identified in the *Brisbane City Council Planning Scheme 2014* as being appropriately integrated. No further assessment is required under the State Planning Policy state interests.

#### 6.1.3 Referral Agency

In accordance with the *Planning Regulation 2017*, the application does not trigger any referrals.

#### 6.1.4 State Development Assessment Provisions

As this application does not trigger referral to the State Assessment and Referral Agency, the State Development Assessment Provisions do not apply.

#### 6.1.5 South East Queensland Regional Plan

The subject site is identified within the Urban Footprint designation of SEQ Regional Plan 2017. Land within the Urban Footprint is intended to incorporate the full range of urban uses including housing, industry, business, infrastructure, community facilities and other integral components of well-planned urban environments, such as local areas for sport and recreation and urban open space. The proposal is consistent with the intent of the Regional Plan.

## 6.2 Local Government

### 6.2.1 Definition (Brisbane City Plan 2014)

#### **Multiple Dwelling**

Multiple dwelling means a residential use of premises involving 3 or more dwellings, whether attached or detached.

### 6.2.2 Level of Assessment

The original development application triggered Impact Assessment due to the height of the development being greater than the prescribed height of 5 storeys per the Mt Gravatt central medium density residential sub-precinct (NPP-002c) of the Mt Gravatt central precinct (NPP-002) of the Mt Gravatt corridor neighbourhood plan.

If the application were made today, given the height of the proposal continues to exceed the nominated 5 storey height limit of the Mt Gravatt central medium density residential sub-precinct (NPP-002c) of the Mt Gravatt central precinct (NPP-002) of the Mt Gravatt corridor neighbourhood plan, the application continues to trigger Impact Assessment and therefore is required to be publicly notified.

### 6.2.3 Strategic Framework

As the proposed development is subject to impact assessment, the application is to be assessed against the entire City Plan, including the relevant aspects of the Strategic Framework. The Strategic Framework sets the policy direction for the planning scheme and forms the basis for ensuring appropriate development occurs throughout the Brisbane area for the life of the City Plan.

The strategic intent of the Strategic Framework seeks to achieve a vision for Brisbane to become Australia's new world city. Section 3.2.1 of the City Plan emphasises that: "Brisbane is evolving into a city that plans strategically for its economic development and optimises, protects and maintains the characteristics that its residents value highly. Brisbane is known for its unique subtropical lifestyle and capacity for its residents to actively contribute to its future and enjoying its lifestyle."

The following five (5) themes collectively represent the policy intent of the City Plan:

- Theme 1: Brisbane's globally competitive economy;
- Theme 2: Brisbane's outstanding lifestyle;
- Theme 3: Brisbane's clean and green leading environmental performance; 34

- Theme 4: Brisbane's highly effective transport and infrastructure; and
- Theme 5: Brisbane's CityShape.

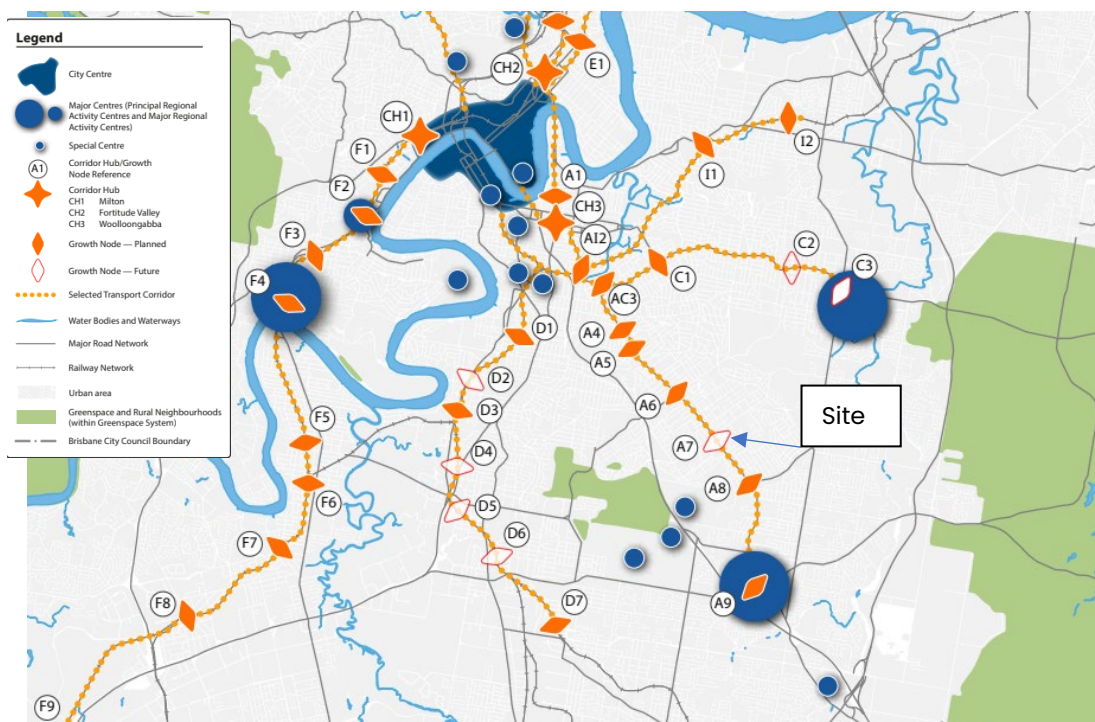


Figure 7: Strategic Framework Mapping

An assessment of the development against these themes of the Strategic Framework is not required given the level of assessment has not been altered as a result of the change application. The existing approval was subject to Impact Assessment and was subject to a detail proposal of the Strategic Framework. The increase in overall building height (by 4 storeys) is inconsequential to the previous assessment. Therefore, an updated assessment against the Strategic Framework is not warranted in this instance. Furthermore, it is considered that the development remains compliant and aligned with the Strategic Framework and does not represent a major departure from the planning scheme.

#### 6.2.4 Applicable Codes

In accordance with Part 5 of the Brisbane City Council *Planning Scheme 2014*, the following assessment benchmarks are identified as being applicable to the proposal:

Site summary and project details	
Zone code	Medium density residential zone code
Neighbourhood Plan	Mt Gravatt corridor neighbourhood plan code
Use code	Multiple dwelling code
Prescribed secondary codes	Filling and excavation code Infrastructure code Landscape code

	Outdoor lighting code Stormwater code Transport, access parking and servicing code
Overlay codes	Airport environs overlay code Community purposes network overlay code Critical infrastructure and movement network overlay code Dwelling house charter overlay code Road hierarchy overlay code Streetscape hierarchy overlay code Transport noise corridor overlay code

## 7.0 Performance Planning

### Building height

AO4.1 of the Multiple Dwelling code requires requires that development comply with:

- a) the maximum building height prescribed in a neighbourhood plan; or
- b) where not specified, the height limits in Table 9.3.14.3.B of the code.

The height limits specified in Table 7.2.13.10.3.B specifies a height limit of 5 storeys for the site. Given the proposal is seeking a 10 storey development outcome, PO4 is sought. The proposed increase in building height from 6 to 10 storeys aligns with the evolving urban character of the area, especially given the site's adjacency to a district centre and its location on the periphery of a strategic growth node. It is important to consider in this instance the maximum height limit in the neighbourhood plan is 15 storeys where on a landmark site, particularly in the changing context of the site and it's inclusion in the Draft Mt Gravatt Precinct Boundary.

The architectural design incorporates an articulated façade treatment and provides appropriate setbacks to ensure a sensitive transition to neighbouring lower-scale developments. Additionally, the increased height facilitates higher-density living in proximity to essential services and public transport, supporting broader city planning objectives without compromising residential amenity.

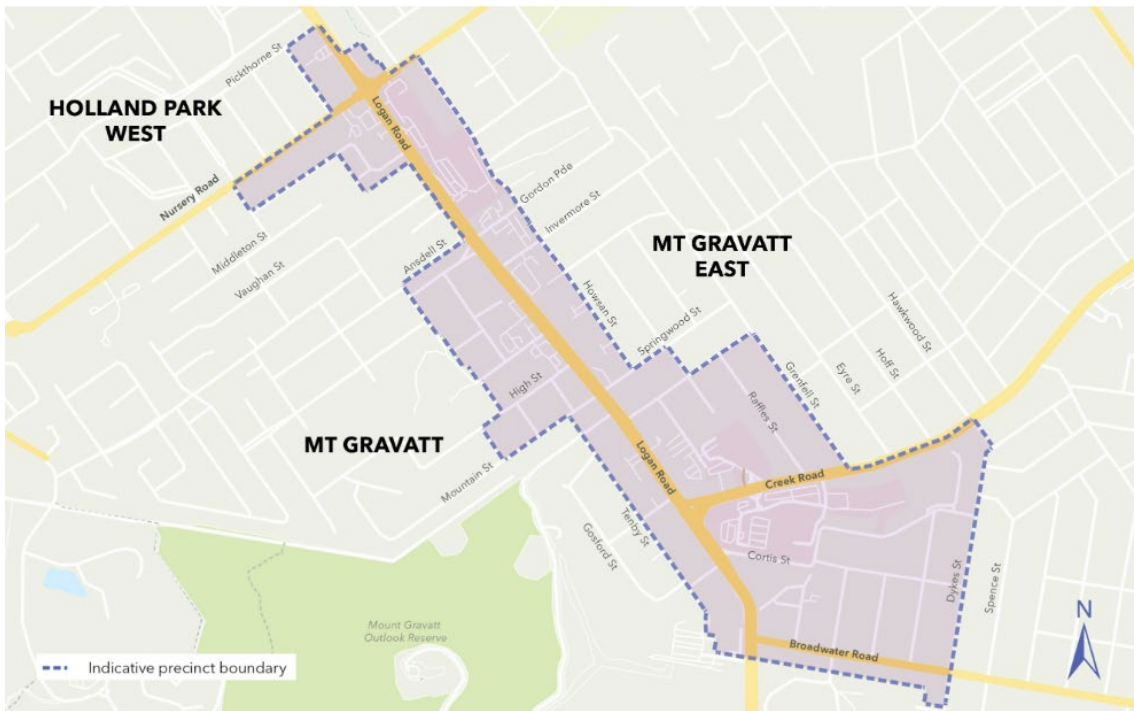


Figure 8: Mt Gravatt Precinct Boundary

It is further noted that the proposed change in building height is consistent with the strategic intent of the Mt Gravatt Corridor Neighbourhood Plan, which seeks to concentrate residential density in well-served, centre-adjacent locations. The subject site directly adjoins a district centre and sits within the renewal precinct identified for increased residential intensity. The proposal provides a highly articulated and slender tower form, with appropriate tower setbacks and transition to adjacent interfaces. It leverages the site's generous area and width to deliver housing growth while maintaining visual privacy, solar access, and development potential for surrounding sites. Infrastructure capacity and amenity considerations have been addressed to ensure no significant adverse impacts result.

### Private Open Space

The *Multiple Dwelling Code* outlines minimum private open space requirements for multiple dwellings, both at ground level and above. Acceptable Outcome AO31.1 and Performance Outcome PO31 of the *Multiple Dwelling Code* set the benchmarks for private and communal open space. Specifically:

#### AO31.1

Development provides private open space comprising:

- a) for ground storey dwellings – a minimum area of 35m<sup>2</sup> with a minimum dimension of 3m;
- b) for dwellings above ground storey – a balcony with a minimum area of 12m<sup>2</sup> and a minimum dimension of 3m.

However, with the proposed increase in building height, and amended design new winter gardens are introduced in association with the revised modular construction method nominated. The winter gardens generally remain consistent in approach with the balconies already approved across the development.

Where the new winter gardens fall slightly short of the prescribed 12m<sup>2</sup>, the development still meets the intent of Performance Outcome PO31, which states:

**PO31**

Development must provide attractive and functional private open space for residents that:

- a) is appropriately sized and located to enhance amenity and liveability;
- b) is designed to be functional for the number of potential occupants in each dwelling;
- c) contributes to the architectural form and articulation of the building.

Key supporting considerations include:

- The smaller winter gardens are limited to smaller unit typologies (e.g. one-bedroom / studio apartments) and are proportionate to the scale of the unit.
- Despite their reduced size, the winter gardens function as meaningful extensions of internal living areas and offer a usable, high-amenity private open space for residents.
- These spaces are uncluttered, with no placement of utilities such as hot water systems or air-conditioning units.
- The winter gardens continue to offer access to natural light, air, and outdoor outlook, maintaining their value as functional private open space.
- Additionally, the development provides generous communal rooftop open space (1,434m<sup>2</sup>) and resident amenities, which offset any minor reductions in individual private open space provisions.

## 8.0 Relevant Matters

Section 45(5) of the Planning Act 2016 prescribes that Impact Assessable development applications:

a) Must be carried out:

- i. Against the assessment benchmarks in a categorising instrument for the development;  
and
- ii. Having regard to any matters prescribed by the regulation for this subparagraph; and

b) May be carried out against, or having regard to, any other relevant matter, other than a person's personal circumstances financial or otherwise.

The following have been highlighted in support of the proposed change application:

### **Strategic Context and Alignment**

The subject site is located within the Medium density residential one, directly adjoining a large District centre and situated on the edge of a designated growth node under the Brisbane City Plan 2014 Strategic Framework. The increase in building height from 6 storeys to 10 storeys is considered both strategically sound and consistent with the overall intent of the Planning Scheme, based on the following:

- Proximity to Centre Functions: The site is immediately adjacent to a District centre, where greater intensity, height, and activity is encouraged. The increased height supports the logical extension of centre-supportive uses and densities into the transitional residential interface and is appropriately co-located with these centre activities.
- Growth Node Alignment: The site sits within the catchment of a nominated strategic growth node. Increasing the building height optimises the land's contribution to meeting dwelling supply, population growth, and urban consolidation outcomes in a well-located area.
- Efficient Use of Well-Located Land: The proposal leverages existing infrastructure and proximity to public transport, local services, and retail to deliver increased residential density in a sustainable and consolidated form.

#### **Mt Gravatt Centre Suburban Renewal Precinct**

The subject site is strategically positioned within the Mt Gravatt Centre Suburban Renewal Precinct, adjacent to a district centre and on the periphery of a designated growth node. This location aligns with the precinct plan's objectives to provide diverse housing options and enhance connectivity. By increasing building height and density, the development can offer more housing choices, catering to various household types as emphasized in the plan's housing choice theme. Furthermore, the site's proximity to public transport and local amenities supports the plan's goal of connecting people and places, encouraging active transport and reducing reliance on private vehicles. The proposed development also contributes to creating a vibrant village by potentially increasing foot traffic and supporting local businesses. Overall, the site's characteristics and proposed enhancements are consistent with the precinct plan's vision for sustainable growth and improved liveability in Mt Gravatt.

#### **Built Form and Amenity Outcomes**

The proposed 10-storey development has been carefully designed to ensure that amenity, scale, and urban design principles are upheld:

- Generous Site Area (2,372m<sup>2</sup>): The site is of sufficient size to accommodate increased height while maintaining appropriate areas for deep planting, setbacks, communal open space, and transition to neighbouring properties.
- Appropriate Interface Management: The design includes appropriate building separation, and modulated façades to provide a soft transition to any lower-scale residential development and minimise potential amenity impacts. It is noted that the site is immediately adjoining by further Medium density zoned land, adjacent multiple dwellings and District centre zoned land, therefore not requiring any built form transitions.

#### **Policy Support and Public Benefit**

- Planning Scheme Strategic Framework: The increased building height aligns with strategic outcomes encouraging urban consolidation, housing diversity, and efficient infrastructure use in areas connected to centres and public transport.
- Housing Diversity and Supply: The additional height facilitates the delivery of a greater mix and number of dwellings, contributing to housing diversity in a location with high accessibility.
- Economic Activation: The scale supports population thresholds that activate nearby commercial uses and support walkable neighbourhood principles.

#### **No Undue Adverse Impacts**

- Shadow and View Impact Minimisation: The development is appropriately sited and designed to manage shadowing, visual privacy, and view loss to adjoining properties.
- Traffic and Infrastructure Capacity: the traffic assessment indicates that existing transport and service infrastructure has capacity to accommodate the increased yield, subject to standard augmentation and conditions.

#### **Housing Supply (Quick Delivery and Construction Timeframes)**

Through the proposed change and pivoting to a modular construction method to deliver the project, the proposed development is intended to utilise these modular construction techniques, which significantly enhance delivery timeframes compared to traditional construction methods. Modular construction involves the off-site fabrication of building components in a controlled environment, allowing for high levels of efficiency, quality control, and reduced weather-related delays. These modules are then transported to the site and assembled rapidly, minimising on-site labour and disruption. This construction methodology supports a faster build program, enabling the development to continue to increase the availability of housing and reach the market significantly sooner. In the context of the ongoing housing demand concerns across Brisbane and South East Queensland, this accelerated delivery model plays a vital role in addressing housing supply shortages. The ability to bring dwellings to market quickly ensures that critical housing stock is released in a timely manner, contributing meaningfully to broader housing affordability and availability objectives.

#### **Car parking**

As identified in the previous approval, the Multiple dwelling delivering 62 units delivering 93 car parking spaces. The previous application provided 1.5 car parking spaces for each unit for the entire development.

The proposal seeks to deliver 112 units and provide 126 and 32 motorcycle parking spaces at a rate of 1.4 parking spaces for the development. We highlight that the proposal delivers 16 studio apartment which is aimed at providing student accommodation. As such, the demand for car parking is not determined to be a significant and aligns with the previous car parking demand as previously approved. On balance, the car parking allocation is determined to be adequate. In support of this position, please find attached the traffic impact assessment report which supports the proposed development and the car parking allocation.

## 9.0 Conclusions

This report is submitted on behalf of 39 Raffles street investments Pty. Ltd. in support of the Change Application under section 78 and section 82 of the Planning Act 2016 seeking an Other Change for a material change of use for Multiple Dwellings over land at 29 – 43 Raffles Street, Mount Gravatt East, formally described as Lots 7-9 on RP13380 and Lot 100 on SP281409.

This application has assessed the proposal against the relevant assessment benchmarks prescribed in the applicable Local and State planning instruments. The report has demonstrated that the application complies with all of the relevant assessment benchmarks.

The subject site is appropriately zoned to accommodate the proposed uses which support the increase in housing supply and the uplift in building height proposed. This report and associated appendices provide a comprehensive assessment of the proposed development against the relevant use, overlay and neighbourhood plan codes. Through this assessment we have formed a strong opinion that the applicant has proposed a high-quality development that allows for the effective use of the site which is complimentary with the surrounding locality.

It is also re-iterated to council that developments such as that proposed provide an innovative business model, which leverages modular design and construction techniques to enable the project's completion in as little as nine (9) months following the finishing of basement levels. This accelerated timeline offers a compelling incentive for Brisbane City Council to support the proposed development, reflecting industry-leading construction efficiencies. Such rapid delivery is especially critical amid the urgent need for increased housing supply.

It is for the reasons stated and above and throughout the report that the proposed change application should be approved, subject to reasonable and relevant conditions.



David Zanker  
Director – BURP RPIA  
Blume Planning and Development