

24 June 2026

Department of State Development, Infrastructure, Local Government and Planning
Brisbane SARA
PO Box 15009
CITY EAST QLD 4002

Sent Via: MyDAS

Dear Sir / Madam,

RE: REQUEST FOR MINOR CHANGE IN ACCORDANCE WITH S81 OF THE PLANNING ACT 2016 – DEVELOPMENT PERMIT FOR CHANGE APPLICATION UPON LAND LOCATED AT 52 HAMPDEN STREET, ASCOT QLD 4007 (SARA REF: 2410-42891 SRA)

We write to you in relation to the abovementioned landholding and attach for your assessment a copy of the minor change application in accordance with Section 81 of the *Planning Act 2016*.

To facilitate assessment of the proposal, please find enclosed the following:

- DA Form 5;
- Signed Owners Consent;
- Architectural plans by *Jackson Teece*;
- Landscape Concept Plan by *Arcadia*;
- Traffic & Transport Engineering Letter prepared by *PTT*; and
- Copy of BCC Minor Change Application prepared by *Town Planning Alliance*.

We note that a concurrent Minor Change application has been submitted to Brisbane City Council (BCC) requesting a series of minor changes which are reflected in the attached plans. A copy of this application to BCC is enclosed for your information

We trust that the information provided is to your satisfaction. Should you wish to discuss the matter further please do not hesitate to contact our office on (07) 3361 9999.

Yours faithfully
TOWN PLANNING ALLIANCE PTY LTD



Tara Nunn
SENIOR PLANNER

Enc Minor Change Application

MINOR CHANGE APPLICATION

1. Site Details

Site Address	52 Hampden Street, Ascot QLD 4007
Real property description	Lot 952 on SP303686
Area of site	4,600m ²
Zone	Sports and recreation (metropolitan) zone
Neighbourhood Plan	Racecourse precinct neighbourhood plan <ul style="list-style-type: none"> ▪ Racecourses precinct (NPP-002) ▪ Doomben south sub-precinct (NPP-002e)
Overlays	<ul style="list-style-type: none"> ▪ Airport environs overlay ▪ Community purposes network overlay ▪ Critical infrastructure and movement network overlay ▪ Flood overlay ▪ Potential and actual acid sulfate soils overlay ▪ Road hierarchy overlay ▪ Streetscape hierarchy overlay ▪ Transport noise corridor overlay

The subject site comprises a single allotment of regular configuration, with a total site area of 4,600m². The land has a single frontage to Hampden Street to the south of approximately 16m, with the balance of the southern boundary of approximately 42m becoming a side boundary to 104 Lamington Avenue, Ascot. Generally, the land is flat at about 5.8m AHD, with the adjoining land to the south and east containing an open drainage channel down to 4m AHD.

The subject site is located at 52 Hampden Street, Ascot, and is formally described as Lot 952 on SP303686. It forms part of the Brisbane Racing Club Preliminary Approval and is located within the Doomben Residential and Retirement Precinct (Precinct 9). Under the current *Brisbane City Plan 2014*, the site is located in the Sport and recreation (Metropolitan) zone and Doomben south sub-precinct of the Racecourse precinct neighbourhood plan. The site is identified as being well located in relation to existing public transport, services and facilities.



Figure 1: Recent aerial image of the subject site (Source: Landchecker, June 2026)

Land immediately adjoining to the north and west is also identified within the Sport and recreation zone. Land to the south and east is identified in the Low-medium density residential zone. Refer to **Error! Reference source not found.**

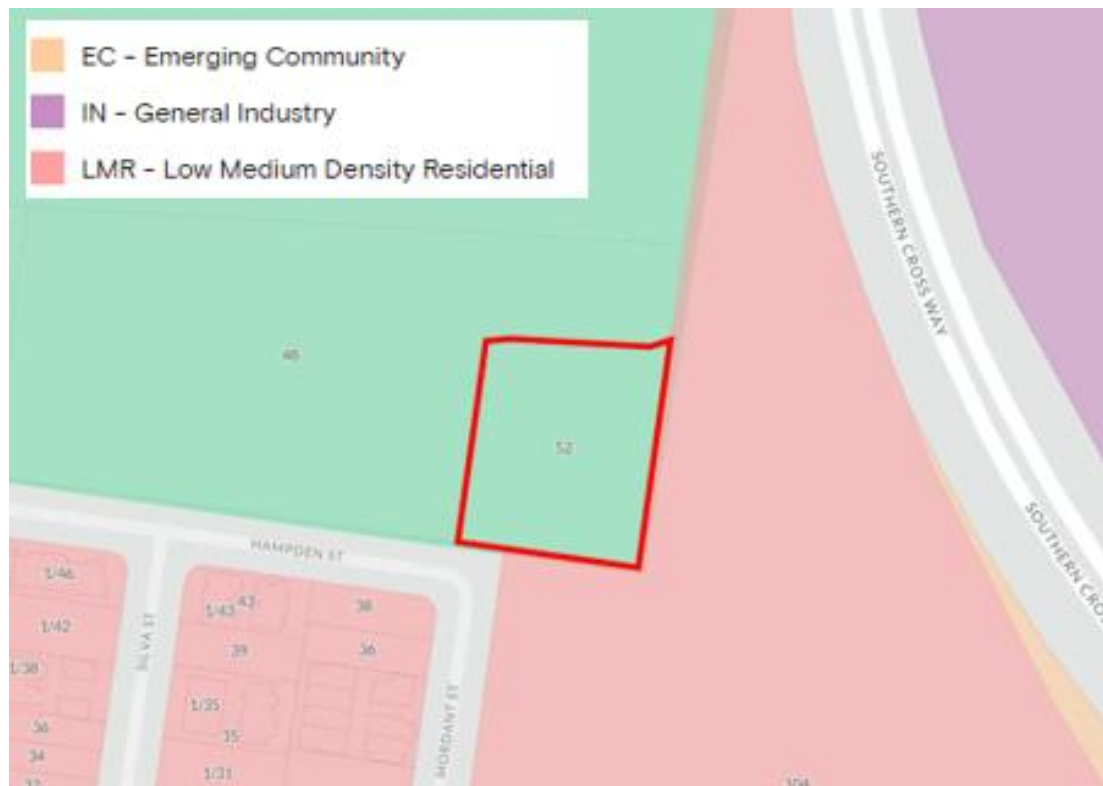


Figure 2: Zoning Map (Brisbane City Council 2014 Mapping)

2. Relevant Context

While the subject site is located within the Sport and recreation zone and Racecourse precinct neighbourhood plan, the site forms part of the 'Brisbane Racing Club Preliminary Approval' (A003048197). The Preliminary Approval overrides the planning scheme to vary the effect of the Brisbane City Plan 2000 for Material Change of Use for Caretaker's Flat, Warehouse, Youth Club, Veterinary Surgery, Utility Installation, Telecommunication Tower, Stable, Short Term Accommodation, Shop, Restaurant, Park, Outdoor Sport and Recreation, Office, Multi-Unit Dwelling (including Aged care accommodation), Medical Centre, Industry, Indoor Sport and Recreation, Hotel, Home Business, Estate Sales Office, Education Purposes, Display Dwelling, Convention Centre, Community Facilities, Club and Child Care Facility.

The Preliminary Approval was granted by Council on 27 November 2012. A Negotiated Decision Notice was granted in part by Council on 3 May 2013. An Appeal Notice was lodged by the applicant against a number of conditions within the Negotiated Decision Notice due to errors and omissions within the conditions package. A Court Judgement was handed down on 5 July 2013 approving the appeal request.

On 10 November 2015, a Permissible Change was granted by the Planning and Environment Court to amend the Development Approval. Further Permissible Change applications were made and granted by the Planning and Environment Court on 14 December 2016 and 30 June 2020 which was the most recent application. The Preliminary Approval varies the effect of the Planning Scheme by the Brisbane Racing Club - Eagle Farm and Doomben Racecourses Master Plan. The Brisbane Racing Club Master Plan specifies the following with respect to the development within the Master Plan area:

- Designates the Brisbane Racing Club Master Plan area into a series of Precincts;
- States the levels of assessment for development within each Precinct which prevail over the levels of assessment in the Planning Scheme; and

- Identifies development as assessable against the conditions of the Preliminary Approval and applicable provisions of the *Brisbane City Plan 2000* which prevail over the Planning Scheme.

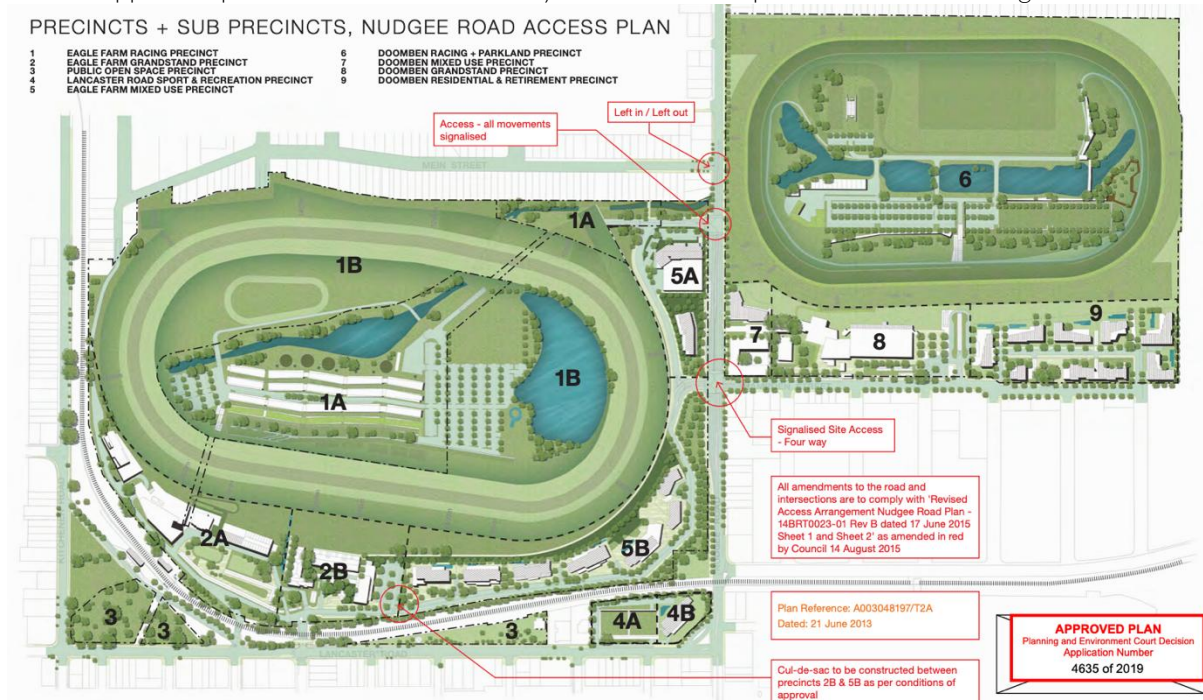


Figure 3: Preliminary Approval (A003048197)

On 13 October 2023, a development approval was granted by Negotiated Decision Notice by Council for a Multi-unit Dwelling (Aged care accommodation) under *City Plan 2000*. The approval comprised of a 5-storey Residential care facility building accommodating 154 beds, 26 car parking spaces, landscaping and associated community facilities and services to support the residential care facility.

3. Application History

To assist Council with this request, the development approval history over the site is detailed below as follows:

- A006248766**

On 29 August 2023, Council approved a development application for Material Change of Use for Multi-Unit Dwelling (Aged care accommodation) for 154 beds across two stages within a 5 storey building. A response was given by SARA in support of the approval on 8 June 2023 (SARA Ref: 2305-34817 SRA).

- A006612775**

On 13 February 2025, Council approved a development application for a Change application (s82) for Material Change of Use for Multi-Unit Dwelling (Aged care accommodation) to increase the number of beds up to 190 beds across two stages within a 6 storey building. A SARA Response was given on 4 December 2024 as part of this approval granting support for the development (SARA Ref: 2410-42891 SRA).

4. Prelodgement-Consultation

On 9 June 2026, a pre-lodgement meeting was held with Brisbane City Council to discuss the proposed amendments. The discussion focused on the suitability of the Minor change pathway, the integration of the proposed Energen substation within the approved development and the supporting information required to accompany a future change application. The proposal was generally supported by Council with further information requested to be presented as part of the formal lodgement of the application.

5. Responsible Entity

Section 78A of the Planning Act 2016 outlines the responsible entity for a change application, as follows:

- (1) *The responsible entity for a change application is—*
- (a) *if the change application is for a minor change to a development condition of a development approval stated in a referral agency's response for the development application or another change application for the approval—the referral agency; or*
 - (b) *otherwise—the assessment manager.*
- (2) *However, the P&E Court is the responsible entity for the change application instead of the person under subsection (1) if—*
- (a) *the change application is for a minor change to a development approval; and*
 - (b) *the development approval was given or changed by the P&E Court; and*
 - (c) *a properly made submission was made about—*
 - (i) *the development application for the development approval; or*
 - (ii) *another change application for the development approval.*
- (3) *Also, the Minister is the responsible entity for the change application instead of the person under subsection (1) if—*
- (a) *the change application is for a change to—*
 - (i) *a condition of a development approval that the Minister directed be imposed or amended under section 95; or*
 - (ii) *a condition of a development approval that the Minister directed be imposed under the old Act, section 419 or the repealed Integrated Planning Act 1997, section 3.6.1; or*
 - (iii) *a development approval given or changed by the Minister for an application that was called in under a call in provision; and*
 - (b) *the P&E Court is not the responsible entity for the change application.*

With reference to the above, we note that the responsible entity for this change request is **Brisbane City Council**.

6. Proposed Changes

Amendments are proposed to the approved development to facilitate permanent power infrastructure via an Energex substation. This change is necessitated following consultation with Energex who required a substation for the site in lieu of a pad mount transformer (PMT). As a result, the proposed amendments generally comprise the following:

- installation of a substation within the car parking area and removal of previously documented PMT;
- associated architectural and façade modifications to accommodate the new infrastructure;
- reconfiguration of onsite car parking in relocating three car parks and a shared bay to the south-western corner of the site boundary previously identified for the PMT. No net loss of car parking is proposed;
- minor reduction in ground floor aisle width;
- minor updates to the pedestrian entry and landscaping along the southern boundary; and
- minor architectural and landscaping amendments to reflect the incorporation of the substation.



Figure 4: Approved Ground Floor Plan (A006612775) (Source: Jackson Teece)



Figure 5: Proposed Amended Ground Floor Plan (Source: Jackson Teece)

Car Parking Layout

As illustrated in *Figure 4* and *Figure 5* above, the proposed amendments do not reduce the approved car parking provision or materially alter the overall development outcome approved on the site. The substation is located generally in the location of approved parking spaces 11 to 13, which have been relocated to the previous PMT location to ensure no net loss of car parking spaces. There are minor changes to the location of structural columns following further detailed design which does not impact the operation of the car park.

Advice from Energex confirms support for the scale and location of the proposed substation. In addition, a Traffic Engineering Letter prepared by PTT confirms the proposed amendments remain suitable from a traffic engineering perspective. The revised layout retains the approved 32 on-site car parking spaces and maintains compliance with the relevant requirements of the Brisbane City Council Transport, Access, Parking and Servicing Planning Scheme Policy and Australian Standard AS2890.1. The memorandum confirms that appropriate parking dimensions, aisle widths, manoeuvring areas, servicing arrangements and pedestrian access are maintained and continue to operate safely and efficiently.

A swept path assessment completed by PTT demonstrates that the revised layout can accommodate the manoeuvring requirements of passenger vehicles, service vehicles and refuse collection vehicles without adversely impacting the operation of the development (refer Figure 6). Furthermore, the relocation of the previously approved PMT from the south-west corner of the site improves sight distances between vehicles entering and exiting the ground floor car park relative to the approved arrangement. Whilst sight lines remain partially constrained by the stepped wall, gas meter enclosure and vehicles parked within space 32, a convex mirror will be installed adjacent to the internal driveway intersection to further improve visibility and reduce the potential for vehicle conflicts, in accordance with the traffic engineering recommendations.

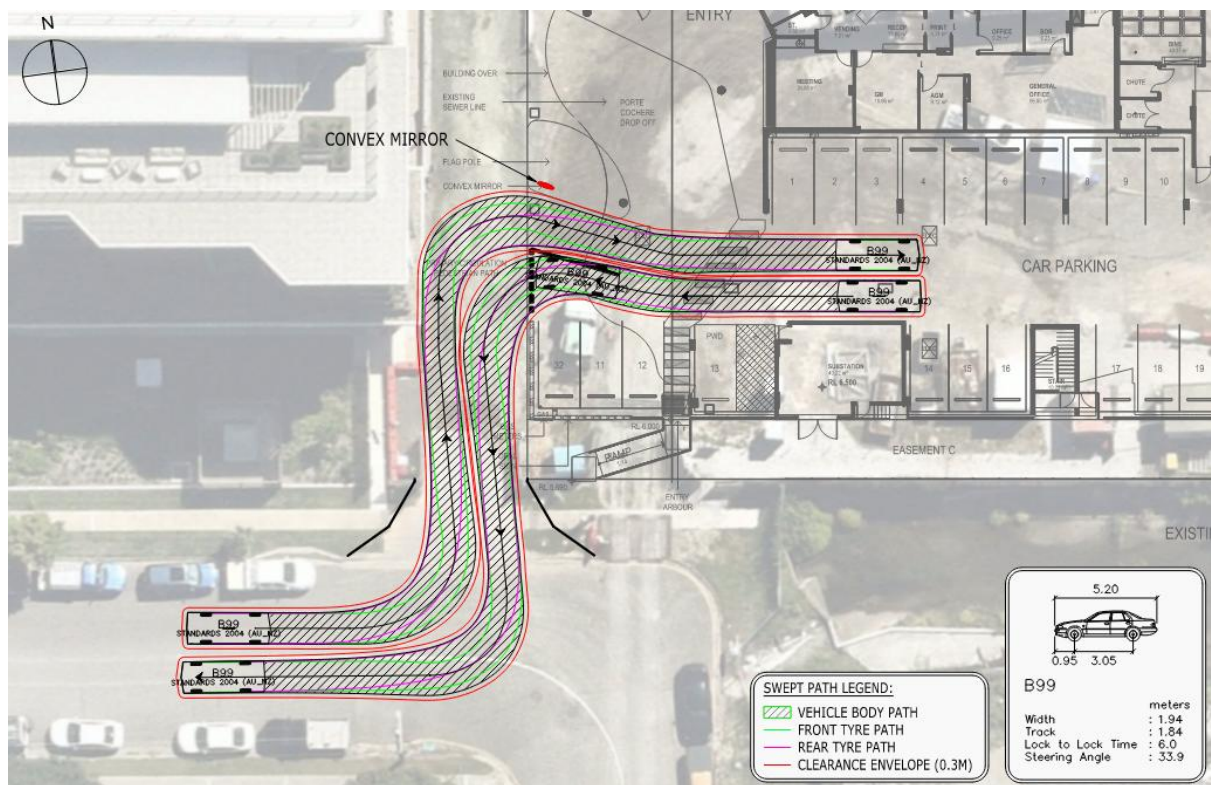


Figure 6: B99 Swept path access and egress adjoining new substation (Source: PTT)

Pedestrian Access and Landscaping

Pedestrian access to the site has shifted west from the approved position due to the substation location. Notwithstanding, the entry arbour maintains a legible pedestrian access and sense of entry to the site. A direct pedestrian crossing from the site boundary to the entry lobby of the building is provided to offer pedestrian prioritised movement through the car park, consistent with the approved outcome.

To further enhance the streetscape presentation of the development, additional landscaping is proposed adjacent to the revised car parking arrangement and substation interface. In response to the prelodgement meeting held with Council, the inclusion of a large canopy tree was explored however the south-west corner of the site is heavily constrained by existing and proposed service infrastructure as illustrated in Figure 7. Accordingly, the proposal incorporates garden bed planting and soft landscaping treatments to improve visual amenity and soften the built form at this corner of the site.

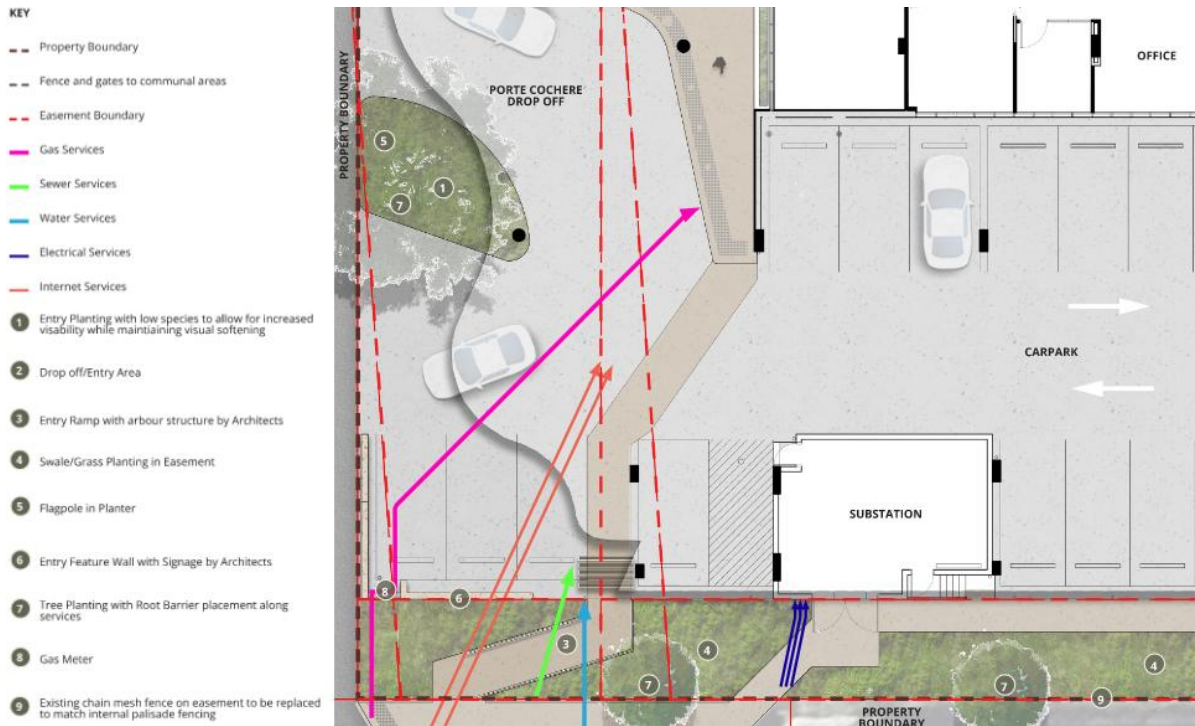


Figure 7: Proposed Landscaping Plan – Ground Floor (Detailed Plan 2) (Source: Arcadia)

Architectural Treatment

The proposed new substation is located within the ground floor of the existing building footprint. To integrate the substation with the balance of the building, the external finish of the infrastructure retains the approved lightweight and natural colours and finishes. As the substation is located within the existing development footprint, the changes do not result in any increase in bulk or scale, and is consistent with the existing approved building appearance.



Figure 8: South-western perspective with substation (Source: Jackson Teece)

7. Changes to Approved Drawings

Consequential changes are proposed to the list of approved drawings to reflect the proposed changes. The proposed plans submitted as part of this Change application will supersede the existing approved plans. A detailed list of the changes to the approved drawings and documents is provided in the table below.

Table 1: Proposed Changes to Approved Drawings

Drawing or Document	Number	Plan Date
Plan – Ground Floor	DA2.09 (REV P4)	JUN-2026
Plan – Ground Floor	DA2.09 (REV P3)	13-FEB-2025

8. Changes to Conditions

As described above, the applicant seeks to changes to the Brisbane City Council Development Approval which subsequently will result in a revised suite of approved drawings and documents. A list of the proposed changes to the conditions is included below. Where wording is to be removed, the text has been ~~struck through~~ and where text is proposed it has been **bolded and is in red**.

No.	Conditions	Condition timing
1.	The port-cochere and pedestrian footpath must be provided generally in accordance with 'Plan – Ground Floor', drawing number DA2.11, revision P2, revision P5 , as amended in red by SARA.	At all times

9. Planning Act 2016 Provisions

The changes to the development approval are identified as meeting the benchmark for a Minor Change to development approval in accordance with Schedule 2 of the *Planning Act 2016*, given that the change:

- (i) ***Would not result in a substantially different development*** – The proposed changes to the approval as described above do not result in a substantially different development having regard to the matters in Schedule 1 of the Development Assessment rules. In particular, the change does not result in the following:
 - a) ***Involve a new use*** – The proposed change does not involve a new use.
 - b) ***Results in the application applying to a new parcel of land*** – The proposed change does not result in the application applying to a new parcel of land.
 - c) ***Dramatically changes the built form in terms of scale, bulk and appearance*** – The proposed change does not dramatically change the built form in terms of scale, bulk or appearance. The proposed change for a new substation and removal of the approved PMT retains the approved lightweight and natural colours and finishes to integrate the substation with the balance of the building. Landscaping will continue to be provided along the southern boundary to soften the built form generally as per the approval. As such, the proposed changes do not dramatically change the built form in terms of scale, bulk or appearance.
 - d) ***Changes the ability of the proposed development to operate as intended*** – The proposed change does not change the ability of the proposal to operate as intended.
 - e) ***Removes a component that is integral to the operation of the development*** – The proposed change does not result in the removal of any component that is integral to the operation of the development.

- f) *Significantly impacts on traffic flow and the transport network, such as increasing traffic to the site* – The proposed changes will not result in an increase in traffic.
 - g) *Introduces new impacts or increase the severity of known impacts* – The proposed changes do not introduce new impacts or increase the severity of known impacts.
 - h) *Removes an incentive or offset component that would have balanced a negative impact of the development* – The proposed change does not remove any incentive or offset component.
 - i) *Impacts on infrastructure provisions*– The proposed change will not impact on infrastructure provision. The proposal does not increase the number of units proposed or create additional gross floor area.
- (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* – The change would not cause the inclusion of Prohibited development in the application if a development application were made for the development including the change.
 - (B) *Referral to a referral agency, other than to the chief executive, if there were no referral agencies for the development application* – Not applicable, there were referral agencies for the development application.
 - (C) *Referral to extra referral agencies, other than to the chief executive* – The change does not cause referral to extra referral agencies other than to the chief executive.
 - (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* – The change does not require a referral agency to assess the application against a matter other than a matter the referral agency have already had regard to.
 - (E) *Public notification if public notification was not required for the development application* – Not applicable. The development application underwent Public Notification.

10. Conclusion

In view of the above, the proposed changes meet the benchmark for a Minor change to a development approval as detailed in the *Planning Act 2016*.

The proposed amendments are sought to capture changes made to respond to consultant and client input during the detailed design phase. We respectfully request that Council update the approval package as referenced above in section 8.