

**LEVEL 32  
300 GEORGE STREET  
BRISBANE QLD 4000**

URBIS.COM.AU  
Urbis Ltd  
ABN 50 105 256 228

19 November 2024

Minister of Economic Development Queensland (MEDQ)  
Development Assessment  
Level 14, 1 William Street  
Brisbane City QLD 4000

Via email: [pdadevelopmentassessment@dsqlqip.gov.au](mailto:pdadevelopmentassessment@dsqlqip.gov.au)  
CC: [rosie.french@dsqlqip.gov.au](mailto:rosie.french@dsqlqip.gov.au)

**Attention: Rosie French (Manager – Planning CRR PDA)**

Dear Rosie,

## **S99 AMENDMENT APPLICATION TO PDA APPROVAL FOR 83, 87, 93, 93A, 97, 97A, 101, 101A, 105, 105A, 109 AND 109A ALBERT STREET; AND 100, 100A AND 104 MARY STREET, BRISBANE (EDQ REF: DEV2023/1374)**

In accordance with Section 99 of the *Economic Development Act 2012* (the 'ED Act') and on behalf of '*CRR Albert Street Pty Ltd (ACN 660 319 693) as trustee for CRR Albert Street Trust*' ('The Applicant'), *Urbis Ltd* wishes to make amendment application in relation to the PDA Development Approval (Reference: DEV2023/1374). This PDA Development Approval relates to a Material Change of Use for Centre Activities (Office, Shop and Food and Drink Outlet) at 83, 87, 93, 93A, 97, 97A, 101, 101A, 105, 105A, 109 and 109A Albert Street; and 100, 100A and 104 Mary Street, Brisbane described as Lots 3, 4, 5, 6, 7, 8 and 9 on RP59089; Lots 11, 12, 13, 14 and 15 on RP100887; and Lots 1, 2 and 5 on RP621.

The following documents are enclosed and should be read in conjunction with this amendment application letter:

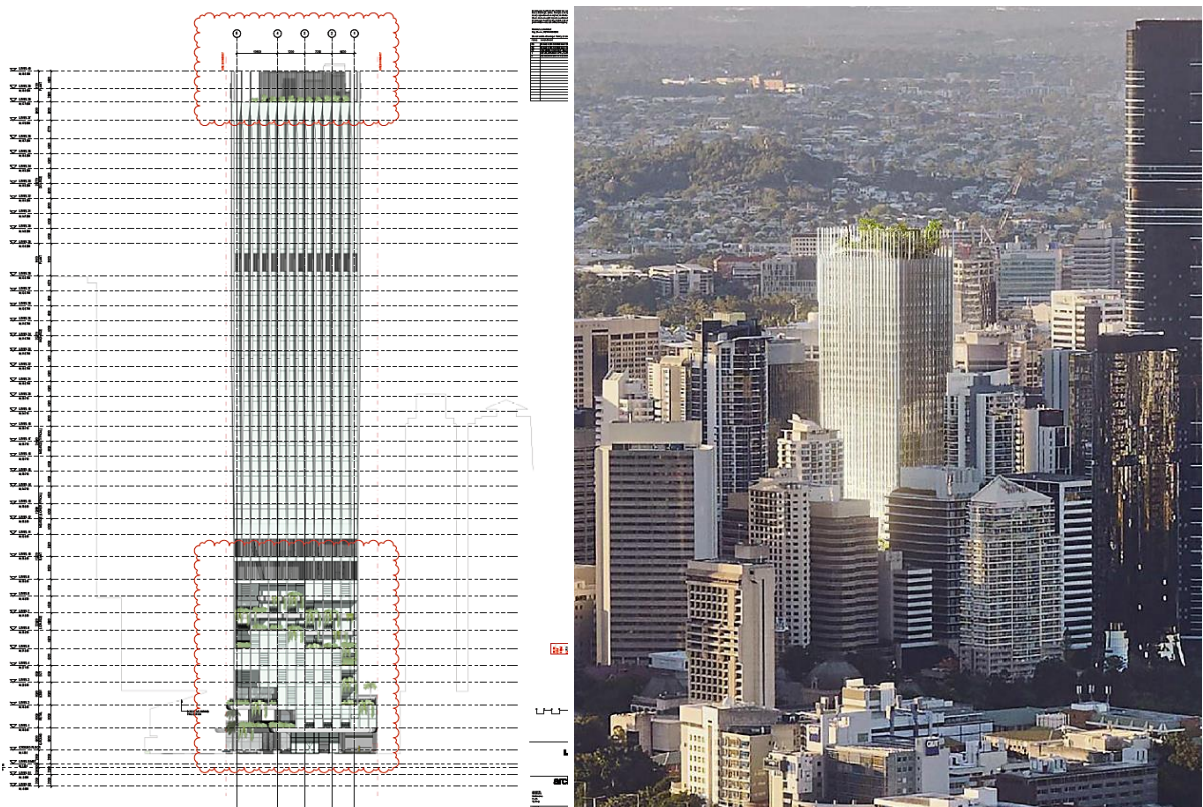
- **Attachment A** – Copy of PDA Approval DEV2023/1374;
- **Attachment B** – Proposed list of changes to approved plans and documents;
- **Attachment C** – Amended Architectural Plans prepared by Architectus;
- **Attachment D** – PDA application form; and
- **Attachment E** – Signed Owner's Consent.



- **Tower site cover:** 1,885m<sup>2</sup> (Approx. 75%)
- **GFA:** 52,755m<sup>2</sup>
- **Maximum building height** 40 storeys (RL187.08m)
- **Maximum podium height:** 5 storeys (RL27.10m)
- **Car parking:** 38 car spaces
- **EOT facilities:** 258 bicycle parking, 31 showers and 538 lockers
- **Access:** provided along Mary Street
- **Servicing:** provided for up to the size of an MRV/RCV

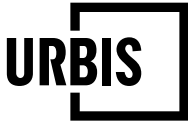
An extract of the approved plans is provided in **Figure 2** below.

**Figure 2** – Extract of approved plans



Source: Architectus

Subsequent to receiving the original PDA Approval, the Applicant has been working towards detailed design in anticipation for construction and operational works to commence on site. As a result of the



detailed review, it is now evident that there is a need for some minor changes to the current approval documentation to help improve the functionality of the building and future tenancy requirements.

A copy of the PDA development approval is provided in **Attachment B** for more details.

### **3. EDQ PRE-LODGEMENT MEETING**

On 24 May 2024, Urbis, QIC, Robert Bird Group, EDG Consulting and Architectus met with EDQ's planners and technical engineering officers and TMR to discuss the upcoming minor amendment application.

At our prelodgement meeting, two components were discussed, which includes the design aspect and the future raft design options (which does not form part of this amendment application).

In terms of our amendment application for the proposed design changes, EDQ's planners and technical officers provided high level support for the minor changes being proposed.

### **4. PROPOSED CHANGES**

This amendment application consists of the following proposed changes:

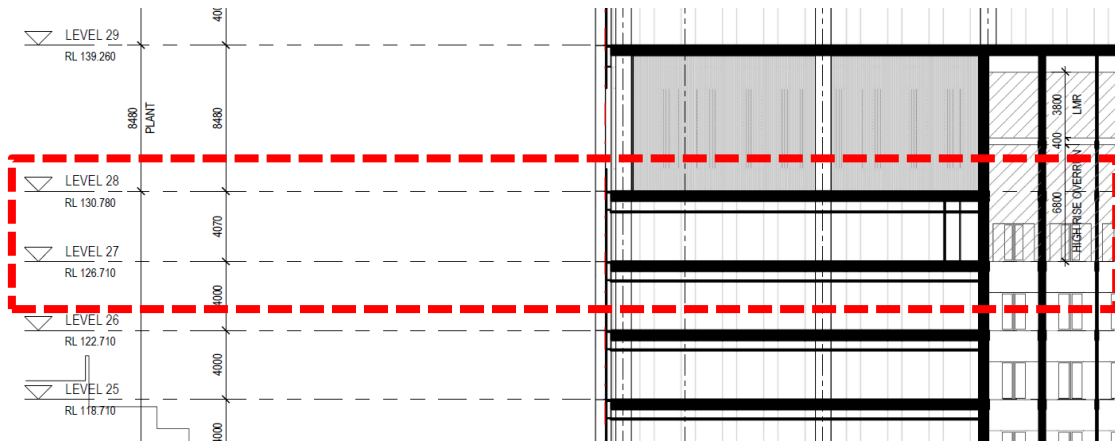
1. Additional storey
2. Façade elevation simplification
3. Landscape awnings
4. General updates

#### **4.1. ADDITIONAL ONE (1) STOREY AND ASSOCIATED STRUCTURAL LOADING**

The first aspect of the proposed minor amendment involves increasing the building by one (1) additional storey, specifically within the high-rise level 27 and 28. An extract of the proposed additional high rise storey is illustrated in **Figure 3** below.

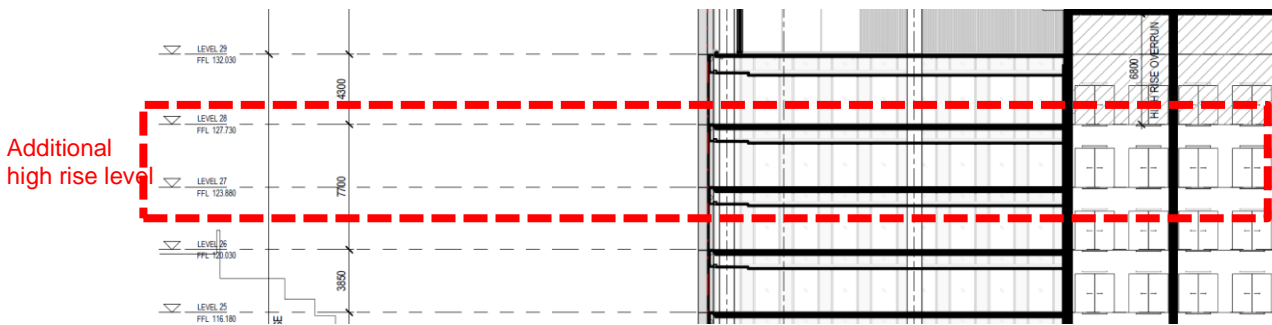
A comparison of the approved and proposed plans is illustrated in **Figure 3** below.

**Figure 3** – Comparison of approved and proposed plans (proposed changes outlined in red)



Picture 1 – Approved plan (General arrangement sections – building longitudinal section)

Source: Architectus



Picture 2 – Proposed plan (General arrangement sections – building longitudinal section)

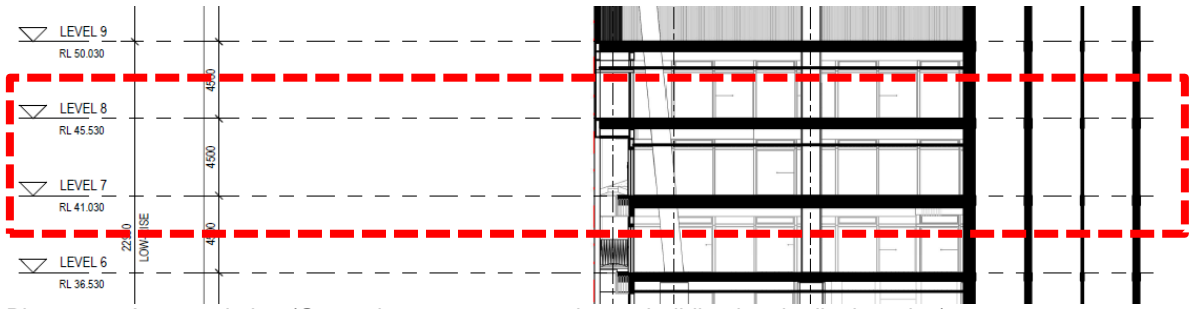
Source: Architectus

Whilst the revised proposal consists of one additional building storey, reduced floor to ceiling height on Level 7 and 8 (from 4000 to 3850mm) through detailed co-ordination allowed the introduction of the additional floor without impacting the approved height. The overall building RL of 185.130m remains unchanged.

A comparison between the approved and proposed elevation plans are provided in **Figure 4** for more details.

Despite the additional floor, the overall building appearance, bulk and scale is consistent with the current development approval. A further comparison between the approved and proposed elevation plans are shown in **Figure 5**.

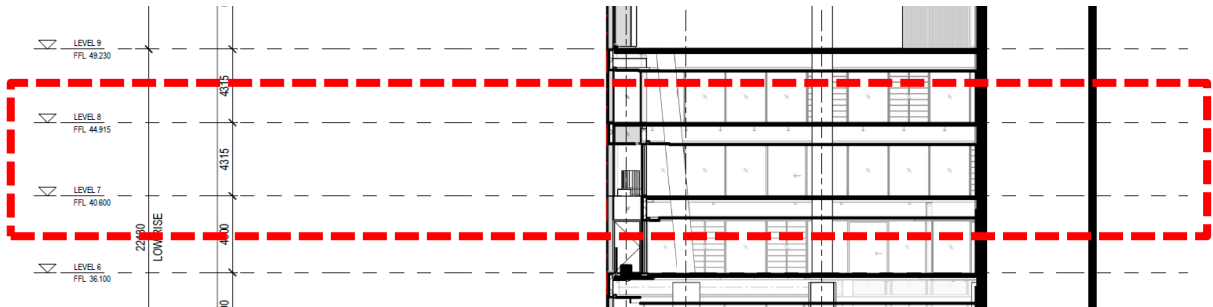
**Figure 4** – Comparison of approved and proposed plans showing reduced floor to floor levels 7 and 8 to retain overall RL height



Picture 1 – Approved plan (General arrangement sections – building longitudinal section)

Source: Architectus

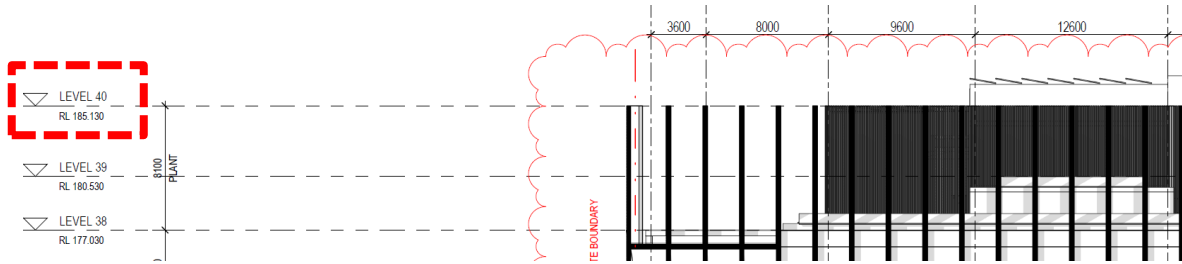
Reduced floor to floor level 7 & 8 to retain crown



Picture 2 – Proposed plan (General arrangement sections – building longitudinal section)

Source: Architectus

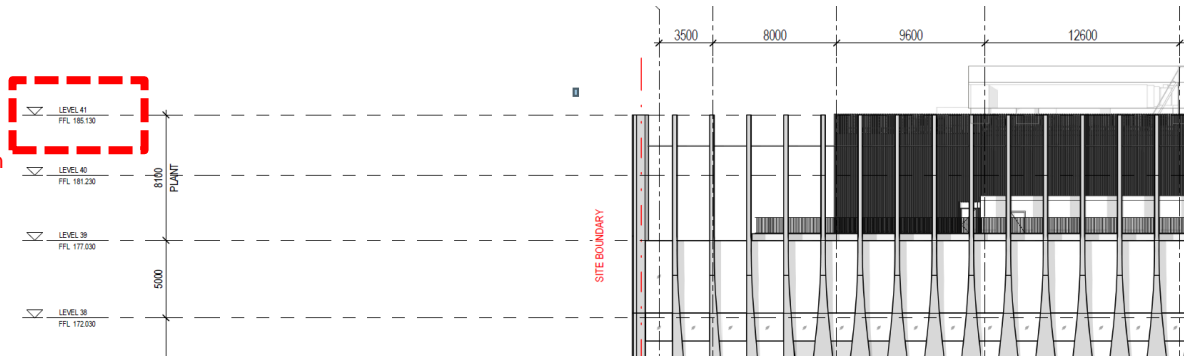
Figure 5 – Overall comparison of approved and proposed elevation plans



Picture 1 – Approved plan (General arrangement sections – building longitudinal section)

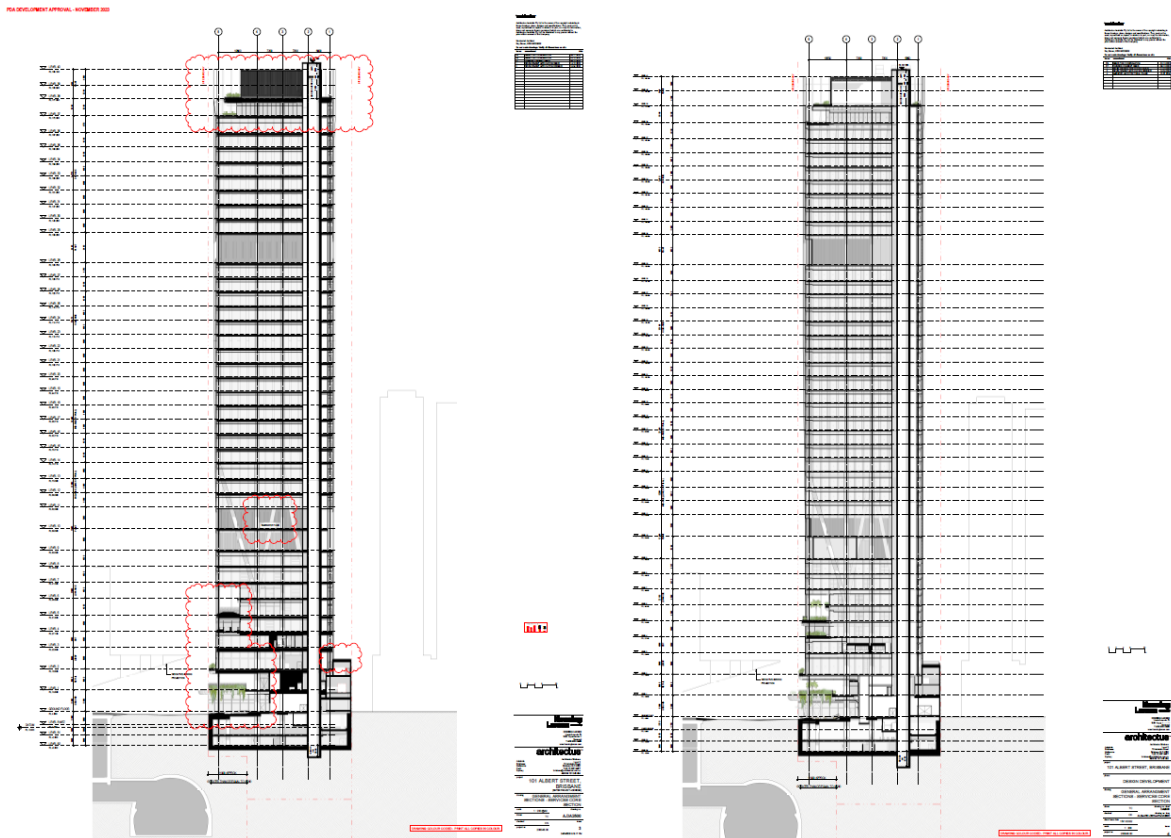
Source: Architectus

Crown RL remains at 185.130RL align with approval



Picture 2 – Proposed plan (General arrangement sections – building longitudinal section)

Source: Architectus



Picture 3 – Approved and Proposed Plan (General Arrangement – Section Plan)

Source: Architectus

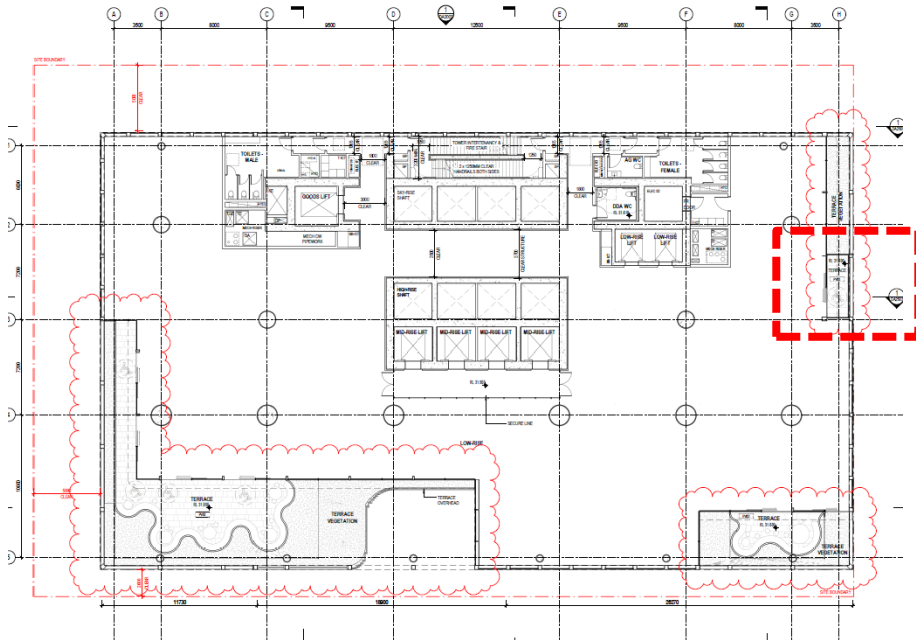
## 4.2. FAÇADE UPDATES

The second aspect of the proposed minor change involves solid cladding material updates within Levels 2, 5, 6 and 7 in order to align with the building’s façade glazing and GRC.

The proposed change is a result of the changes to the proposed material which has resulted in a minor increase to the projection of the overall building to ensure alignment with the approved vertical façade elements.

As illustrated in **Figure 6** below, the overall building bulk, scale and appearance remains unchanged and generally consistent with the approved building and will not be readily visible.

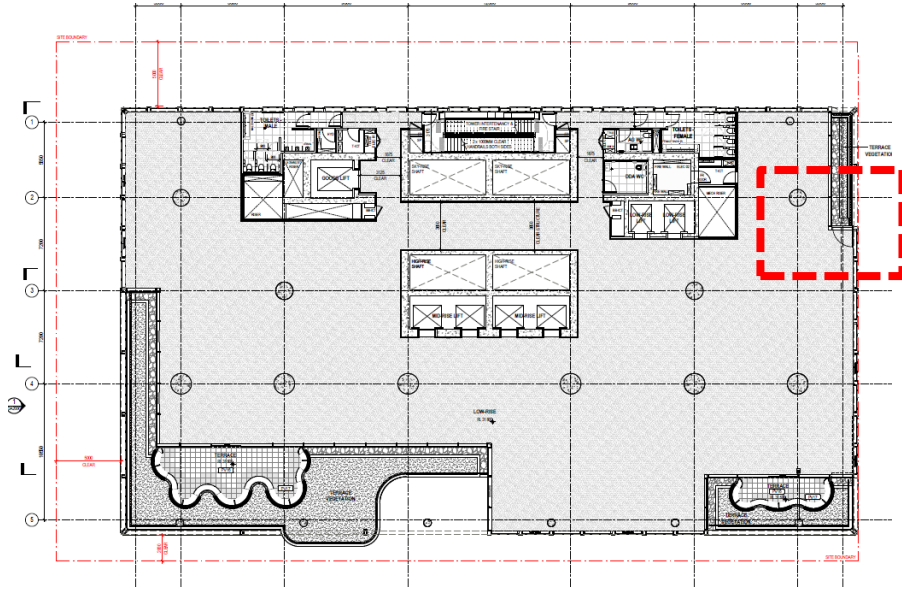
**Figure 6** – Comparison of the approved and proposed low rise plans (areas marked in red)



Picture 1 – Approved plan (Extract of Level 5 Floor Plan)

Source: Architectus





Picture 2 – Proposed plan (Extract of Level 5 Floor Plan)

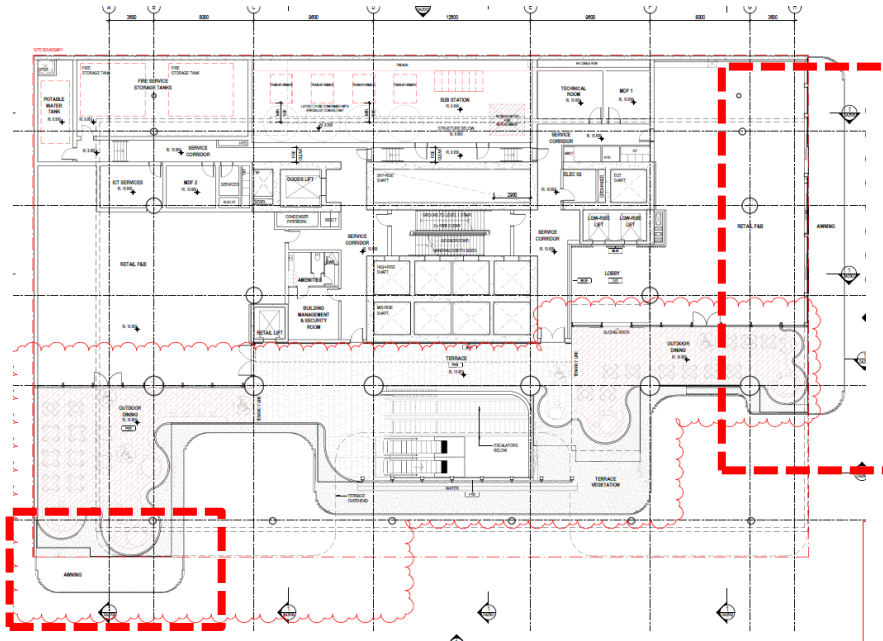
Source: Architectus

### 4.3. AWNING LANDSCAPE

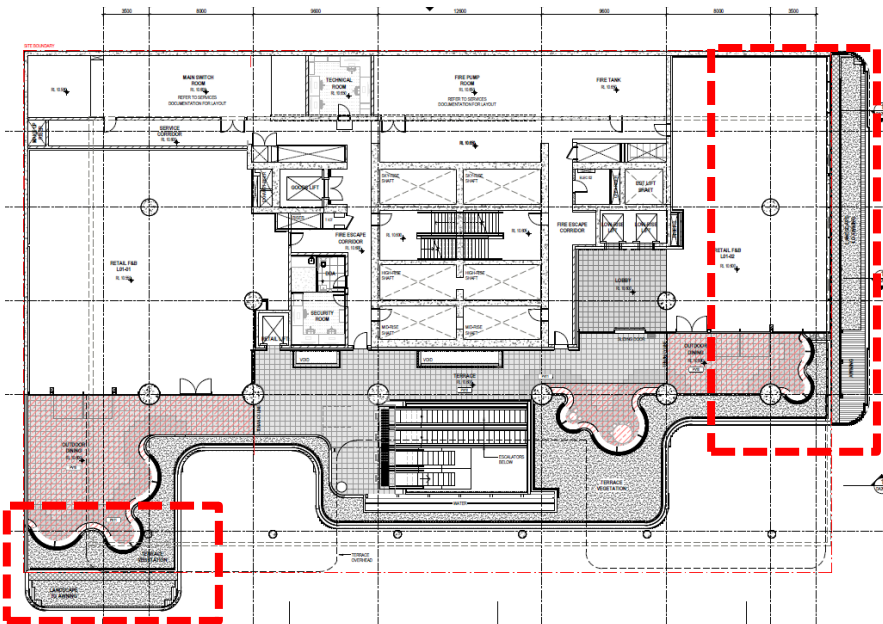
In terms of the landscaping design, it is proposed for the landscaping canopies to be included in the awning design over the footpath. The intent of this design is to provide some visual benefit to future tenants as well as provide additional landscaping to further soften the facade.

A comparison between the approved and proposed plan is provided in **Figure 7** and **Figure 8** below for more details. Full details are provided in the Comparison plans in **Attachment A** and the Landscape Plan in **Attachment B**.

**Figure 7** – An extract of low rise comparison plans showing landscape to awning



Picture 1 – Approved plan (Level 01 Retail)  
 Source: Architectus



Picture 2 – Proposed plan (Level 01 Retail)  
 Source: Architectus

**Figure 8** – Extract of proposed landscaping along awning



Source: Urbis

## 4.4. GENERAL UPDATES

The following general updates are proposed as part of this amendment application.

- Minor increase in overall GFA as a result of the above changes – from 52,755m<sup>2</sup> to 54,681m<sup>2</sup>
- Additional EOT facilities have been provided, resulting
  - Bicycle parking – from 258 to 268 spaces
  - Lockers – from 536 to 538 lockers
- Additional visitor bicycle parking – from 5 to 30 spaces
- Minor increase in goods overrun height from 187.080RL to 187.230RL

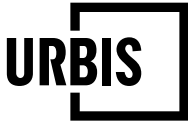
## 5. CHANGES TO EXISTING APPROVAL DOCUMENTS

### 5.1. CHANGES TO APPROVED PLANS AND DOCUMENTS

Changes are proposed to the list of approved plans and documents reference and is contained in **Attachment B** for more details. All requested changes are ~~strikeout in red~~ and proposed and underlined in blue.

In summary, the following drawings sheets will be updated from the previous approved plans package:

- **Development Schedule** - DA0002 (1 sheet)
- **Development Boundary Setback** – DA0110 (1 sheet) to update façade changes
- **Areas** - GFA-DA0200, Landscape-DA0250, GBA-DA0250 (3 sheets) to reflect minor plan updates
- **Plans** - DA1000 to DA1025 (26 sheets all levels),



- **Elevations** - DA2000 to DA2003 (4 sheets)
- **General Arrangement Sections** - DA2500 to DA2505 (5 sheets)
- **Podium Sections** – DA2600, DA2601, DA2700 to DA2704 (7 sheets)

Refer to **Attachment B** for full details.

## 5.2. CHANGES TO APPROVAL CONDITIONS

No changes are proposed or required to the existing conditions of approval.

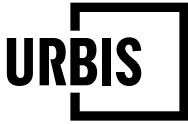
## 6. SUBSTANTIALLY DIFFERENT DEVELOPMENT

In accordance with Section 99(2) of the ED Act, a request to Change a PDA Development Approval can only be considered where the proposed change would not result in the relevant development being *substantially different*. The ED Act however does not qualify or define what constitutes development being substantially different.

It is therefore submitted that the most relevant criteria for the proposal to be considered against is set out in Schedule 1 of the Development Assessment Rules made under the *Planning Act 2016*. **Table 1** below provides an assessment of the proposed changes against the criteria for substantially different development.

Table 1 – Assessment against criteria for ‘substantially different development’

Guideline Criteria	Response
<i>Involves a new use</i>	No new uses are proposed.
<i>Results in the application applying to a new parcel of land.</i>	No new land is proposed to be included.
<i>Dramatically changes the built form in terms of scale, bulk and appearance.</i>	No significant external changes to built-form are proposed. All of the proposed changes are internal within the existing building and will not be visible from the street.
<i>Changes the ability of the proposed development to operate as intended. For example, reducing the size of a retail complex may reduce the capacity of the complex to service the intended catchment.</i>	The proposed additional storey will not result in any non-compliance with the current intent of the development or reduce any capacity to service the intended catchment area.



Guideline Criteria	Response
<i>Removes a component that is integral to the operation of the development.</i>	No integral component is removed as part of this amendment application.
<i>Significantly impacts on traffic flow and the transport network, such as increasing traffic to the site.</i>	The proposed reconfiguration of the approved building is not significant in the context of the total scale development approved at the site. Accordingly, the proposed changes will not result in any <i>significantly</i> different impacts on the surrounding transport network when compared to the existing approval.
<i>Introduces new impacts or increases the severity of known impacts.</i>	The proposed changes are internal and external to the existing building, however, the minor changes will not introduce any significant impacts. Accordingly, there will be no significantly different impacts associated with the proposed changes when compared to the existing approval.
<i>Removes an incentive or offset component that would have balanced a negative impact of the development.</i>	No changes are proposed which remove an incentive or offset of the development.
<i>Impacts on infrastructure provision.</i>	No changes are proposed which impact on infrastructure provision.

The above response table demonstrates that the proposed changes will not result in substantially different development.

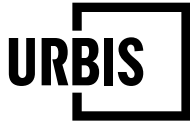
## 7. LAND OWNER'S CONSENT

Landowner's consent to make this change application is included in **Attachment E**.

## 8. AMENDMENT APPLICATION FEE

Economic Development Queensland's *Development Assessment Fees and Charges Schedule (23-24)* states in Section 4 that a proposed s99 amendment applications attract an assessment fee of 25% of the current applicable assessment fee. As the previous development application fee was circa \$100,000, we would like to kindly request for a further discount on the amendment application fee given the minor nature of the proposed changes we are making.

QIC will process payment upon receipt of EDQ's fee quotation in the due course.



## 9. CONCLUSION

The above demonstrates that the proposed changes do not result in substantially different development. The proposed changes will improve the offering of the centre activities at the site and will not result in any significantly different impacts. The proposed amendment application should therefore be supported.

We trust the supplied documentation is sufficient in order for EDQ to undertake an assessment of this request. If you have any questions, please do not hesitate to contact the undersigned or Esther Leung on 07 3007 3518.

Kind regards,

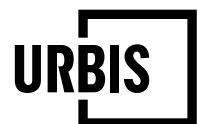
A handwritten signature in cursive script that reads "Penny Douglas".

Penny Douglas  
Director  
+61 7 3007 3806  
pdouglas@urbis.com.au

## ATTACHMENT A – EXISTING PDA APPROVAL

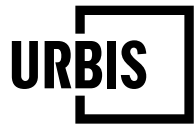


## **ATTACHMENT B – CHANGES TO LIST OF APPROVED PLANS AND DOCUMENTS**

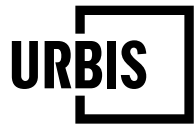


## **ATTACHMENT C – AMENDED ARCHITECTURAL PLANS**





## **ATTACHMENT D – PDA APPLICATION FORM**



## **ATTACHMENT E – SIGNED OWNER’S CONSENT**