

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

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30 May 2025

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

Via email: [pdadevelopmentassessment@dsdlqip.gov.au](mailto:pdadevelopmentassessment@dsdlqip.gov.au)

**Attention: Essen Joseph (Manager – Planning)**

Dear Essen,

**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: DEV2023/1374/2)**

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: DEV2023/1374/2). 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 Amendment Approval DEV2023/1374/2;
- **Attachment B** – Proposed list of changes to approved plans and documents;
- **Attachment C** – PDA application form;
- **Attachment D** – Signed Owner's Consent;

Supporting information related to 'Pile' foundation option:

- **Attachment E** – Engineering Design Note (Foundation and Retention System Changes), prepared by RBG;
- **Attachment F** – Basement Section, prepared by RBG;
- **Attachment G** – Foundation Plan, prepared by RBG;
- **Attachment H** – Shoring Section (applicable to both piles and raft);

Supporting information related to 'Raft foundation option:

- **Copy of Attachment H** – Shoring Section (applicable to both piles and raft);
- **Attachment I** – Design Development Report (Raft Foundation Option), prepared by RBG;
- **Attachment J** – Structural Design Brief (Raft Foundation Option), prepared by RBG;
- **Attachment K** – Geotechnical Note (Revised Raft Piling Modelling Results), prepared by Heilig;
- **Attachment L** – Amended Architectural Plans, prepared by architectus;
- **Attachment M** – Basement section (Raft Option), prepared by RBG;
- **Attachment N** – Footing Plan (Raft Foundation Option), prepared by RBG; and
- **Attachment O** – Proximity to CRR Asset Plan (Sheet 3 and 4), prepared by RBG.

## 1. SITE LOCATION

The site is located on the properties 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. An extract of the site is provided in **Figure 1** below.

The site is located within the Albert Street Cross River Rail (CRR) Priority Development Area (PDA) and accordingly, this amendment application is made to the Minister of Economic Development Queensland (MEDQ).

**Figure 1** – Site location



Source: Nearmap

## 2. EXISTING PDA APPROVALS

### 2.1. ORIGINAL PDA APPROVAL (EDQ APPORVAL REF: DEV/2023/1374)

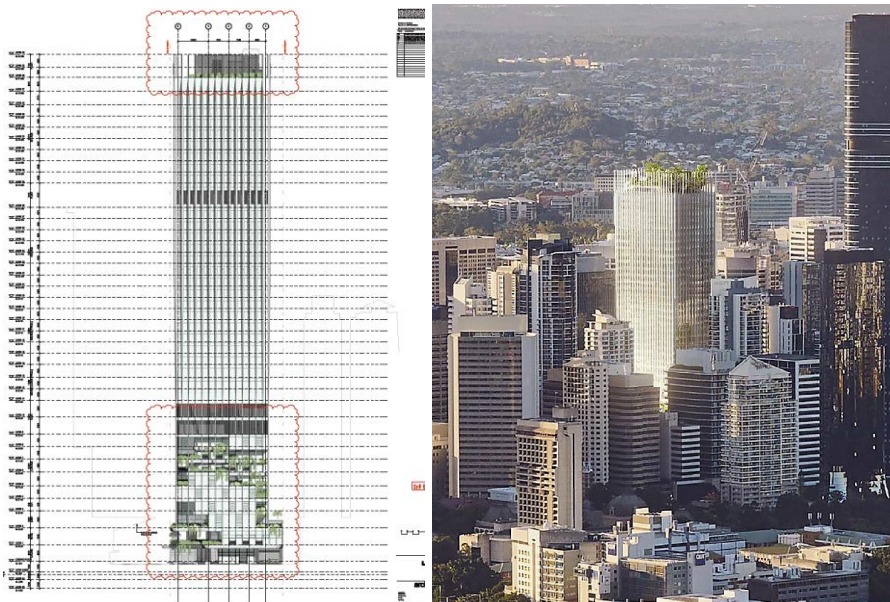
On 6 November 2023, a PDA development approval was issued by Economic Development Queensland (EDQ) for a PDA Development Permit for a Material Change of Use for Centre Activities (Office, Shop and Food and Drink Outlet) at the abovementioned properties (EDQ Ref: DEV2023/1374).

The development approval comprised the following key development parameters:

- **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

## 2.2. AMENDMENT TO PDA APPROVAL (EDQ APPROVAL REF: DEV/2023/1374/2)

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 design stage review, it was evident that there is a need for some minor changes to the current approval documentation in response to the building tenancy requirements. An amendment application was made to EDQ for proposed changes including adding an additional storey, minor changes to façade elevation for simplification and landscape awnings. This amendment application is currently being finalised and decided by EDQ.

## 3. EDQ PRE-LODGE MENT DISCUSSIONS

Multiple discussions were held by way of a prelodgement meeting and information discussions between late 2024 and early 2025 between Urbis, QIC, Robert Bird Group, EDG Consulting and Architectus and EDQ's planners and technical engineering officers, ARUP and TMR to discuss the proposed Amendments to the existing PDA approval.

In our discussions, we reviewed the flexibility of either current approved 'pile' and proposed 'raft' foundation design options. The overall feedback received from EDQ was generally supported in theory, subject to full assessment against the supporting drawings and documentation provided by our consultant team. EDQ also advised that the updated reports will be relied on to adopt an 'either/ or' approach to condition drafting and the submission package will need to be comprised of stand-alone reports to avoid any confusion. EDQ also confirmed that the proposed changes could be resolved and supported via an Amendment (minor change) application.

In response to the feedback provided by EDQ, the Applicant has provided a separate detailed assessment of the alternative 'Raft' foundation design option and is included within **Attachments E to H**.

## 4. PROPOSED CHANGES

Upon receipt of the approved Amendment to PDA approval (EDQ Ref: DEV/2023/1374/2), the Applicant has progressed with the detail design and construction phase. The design is currently at the 80% design development stage. In addition to the current approved 'Pile' foundation design, an alternative 'Raft' foundation design option associated with the development is proposed to improve the overall efficiency and functionality of the design. The purpose of this amendment is to allow the flexibility of either 'Pile' or 'Raft' alternative foundation system to be carried out for the development.

This amendment application consists of the following proposed changes:

- **Minor changes to current approved Pile depth:** Change to the existing approval for pile design to include a lower option than the previous design. Further detail is provided in **Section 4.1** below.
- **Alternative Raft foundations:** This is an alternative solution to the approved pile design. Further detail is provided in **Section 4.2** below.

### 4.1. DEPTH CHANGES TO APPROVED PILE FOUNDATION

Subsequent to further detailed design development stage post PDA approval, the structural engineers at Robert Bird Group ('RBG') and geotechnical engineers at EDG Consulting ('EDG') have reviewed the development of the inground structure for the project and have identified the need to reassess the

geotechnical borehole information. It is advised that within the maximum excavation zone, there is a risk that the founding material in this area would impact the retention system pile and column foundations.

In order to mitigate the potential risk, it is proposed to remove of the tops of the piles below RL-8m (from RL-8m to RL-10m) in order to remove possible interaction with future foundations. The pile and surrounding materials will be replaced with an engineered backfill material to be confirmed by the Geotechnical Engineer. In addition to this, further improvement works are proposed to the 'blue hatched zone' or deeper retention piles. Overall, the building still complies with the CRR performance requirements after the changes being proposed to the foundation and retention system.

Full details on the proposed changes to the foundation, shoring and retention system are provided in the Engineering Design Note (Foundation and Retention System Changes) prepared by RBG in **Attachment E** and further detail is provided on the vibration and geotechnical impacts in the Geotechnical note in **Attachment K**.

## 4.2. PROPOSED ALTERNATIVE RAFT FOUNDATION OPTION

As discussed in the above, an alternative raft foundation option is being proposed in conjunction with the RBG and EDG project engineers have reviewed the proposed alternative raft foundation option for the commercial development.

RBG and DG have prepared separate full reporting that informs the Structural and Design elements of the proposed raft foundation option. Please note that the proposed alternative raft foundation also includes the proposed lower pile toe changes as mentioned in **Section 4.1** above and has been integrated into the revised reports and plans.

Please refer to the supporting documentation contained in **Attachment I to O** for the proposed raft foundation option for full details.

## 5. CHANGES TO EXISTING APPROVAL DOCUMENTS

### 5.1. PROPOSED ADDITIONAL 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.

The following plans and documents associated with the proposed 'Raft' foundation option will be included in the future approval package to allow the flexibility between either 'Pile' or 'Raft' options, refer to **Table 1 and 2** below.

**Table 1** – Proposed plans and documents for Pile foundation option

Approved plans and documents	Number	Date
Design Note: 101 Albert Street - Foundation and Retention System Changes, prepared by Robert Bird Group	Issue Ref: T01	21/03/2025

Basement Section Plan, prepared by Robert Bird Group	ALB-RBG-DWG-ST-03-BC2-31, issue T03	21/03/2025
Foundation Plan, prepared by Robert Bird Group	ALB-RBG-DWG-ST-03-BC2-01, Issue T04	17/07/2024
Shoring Sections Sheet 2, prepared by Robert Bird Group	ALB-RBG-DWG-ST-01-000-62, Revision T02	17/07/2024

**Table 2** – Proposed plans and documents for Raft foundation option

Approved plans and documents	Number	Date
Design Development Report – Raft Foundation Option, prepared by Robert Bird Group	ALB-RBG-REP-ST-00-000-05, Revision T01	21/03/2025
Structural Design Brief – Raft Foundation Option, prepared by Robert Bird Group	ALB-RBG-REP-ST-00-000-04, Revision T01	21/03/2025
Basement Sections (Raft Option) Sheet 1, prepared by Robert Bird Group	ALB-RBG-DWG-ST-03-BC2-81, Revision T04	24/02/2025
Shoring Sections Sheet 2, prepared by Robert Bird Group	ALB-RBG-DWG-ST-01-000-62, Revision T02	17/07/2024
Footing Plan (Raft Option), prepared by Robert Bird Group	ALB-RBG-DWG-ST-03-BC2-51, Revision T05	24/02/2025
Modelling of vibration from piling associated with raft slab design, prepared by Heilig Partners	Nil	12 August 2024
General Arrangement Sections – Services Core Section, prepared by architectus	ALB-ARC-DWG-AR-DA2500, Issue T05	28/02/2025
General Arrangement Sections – Building Core Section, prepared by architectus	ALB-ARC-DWG-AR-DA2501, Issue T05	28/02/2025
General Arrangement Sections – Shuttle Core Section, prepared by architectus	ALB-ARC-DWG-AR-DA2502, Issue T05	28/02/2025

Approved plans and documents	Number	Date
General Arrangement – Building Longitudinal Section, prepared by architectus	ALB-ARC-DWG-AR-DA2503, Issue T05	28/02/2025
General Arrangement Sections - Basement Entry Section, prepared by architectus	ALB-ARC-DWG-AR-DA2505, Issue T05	28/02/2025
Podium Section – Basement Ramp Section, prepared by architectus	ALB-ARC-DWG-AR-DA2600, Issue T05	28/02/2025
Podium Section – Eroded Planter Section, prepared by architectus	ALB-ARC-DWG-AR-DA2601, Issue T05	28/02/2025
Detail Section – Ground Retail Section, prepared by architectus	ALB-ARC-DWG-AR-DA2700 Issue T05	28/02/2025
Detail Section – Ground Ramp and Stair Access Section, prepared by architectus	ALB-ARC-DWG-AR-DA2704, Issue T05	28/02/2025
Proximity to CRR Asset Plan (Sheet 3), prepared by RBG	ALB-RBG-DWG-ST-01-000-13, issue T01	24/02/2025
Proximity to CRR Asset Plan (Sheet 4), prepared by RBG	ALB-RBG-DWG-ST-01-000-14, issue T01	24/02/2025

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

## 5.2. CHANGES TO APPROVAL CONDITIONS

The follow change to the existing condition of approval is proposed to be amended to reflect the either 'Pile' or 'Raft' foundation options. Our proposed condition wording is underlined in blue and proposed removal of condition wording is ~~strike-out in red~~.

Proposed wording for existing approval condition requirement *MCU 8 – Excavation and basement design – Compliance Assessment*, as reflected in **Table 3** below.

**Table 3** – Proposed changes to wording of MCU 8 condition requirement

Condition number	Condition requirement	Timing
MCU 8	<b>Excavation and basement design – Compliance Assessment</b> a) Submit to the EDQ DA, for Compliance Assessment, an Excavation and Basement Report prepared and certified by an RPEQ, <u>for either 'Pile' or 'Raft' foundation option</u> , including:	a) Prior to commencing work



Condition number	Condition requirement	Timing
	<ul style="list-style-type: none"> <li>(i) confirmation of design and performance criteria including standards and supporting documents used for the basis of design;</li> <li>(ii) demonstration of consistency with <a href="#">(and as relevant for either 'Pile' or 'Raft' foundation options)</a>: <ul style="list-style-type: none"> <li>1. <i>Australian Standard AS3798 - Guidelines on Earthworks for Commercial and Residential Developments</i>;</li> <li>2. Design Criteria Report, Albert Street OSD, issue E, prepared by Robert Bird Group, issue E, dated 21 December 2022, and Schematic Design Report, Albert Street OSD, issue E, prepared by Robert Bird Group, dated 21 December 2022, and as validated under Condition MCU 7 – Validation of the development's structural design in relation to State transport interests (CRR). In case of any inconsistencies, the updated structural design report approved under Condition MCU 7 prevails;</li> <li>3. The Geotechnical Engineering Report, Albert Street – Future Over Station Development, prepared by EDG Consulting, document reference B01493-IAC, dated 21 December 2022, Geotechnical Shoring and Design Report (GSDR) approved under Condition MCU 3 and the impact assessment report (on surrounding infrastructure, including CRR) approved under Condition MCU 6. In case of any inconsistencies the impact assessment report approved under Condition MCU 6 prevails;</li> <li>4. <a href="#">Design Development Report – Raft Foundation Option, prepared by Robert Bird Group, document reference ALB-RBG-REP-ST-00-000-05, Revision T01, dated 21 March 2025</a>;</li> <li>5. <a href="#">Structural Design Brief – Raft Foundation Option, prepared by Robert Bird Group, document reference ALB-RBG-REP-ST-00-000-04, Revision T01, Revision T01, dated 21 March 2025</a>;</li> <li>6. the Structural Monitoring and Vibration Report approved under Condition MCU 10 of this approval;</li> <li>7. the Rock and Ground Anchor Report accepted under Condition MCU 9 of this approval;</li> </ul> </li> <li>(iii) detailed design drawings and sections and Construction Plans, including staging, for excavation and basement design, certified by an RPEQ;</li> <li>(iv) a geotechnical soils assessment of the site;</li> <li>(v) accord with the Erosion and Sediment Control Plans accepted under Condition MCU 20 – Erosion and Sediment Management;</li> </ul>	



Condition number	Condition requirement	Timing
	<ul style="list-style-type: none"> <li>(vi) location and quantity of any cut and fill, and the character of material. This should include the fill material to be used if the CRR shaft is to be filled;</li> <li>(vii) detail of the areas where dispersive soils will be disturbed, treatment of dispersive soils and their rehabilitation;</li> <li>(viii) existing and proposed finished levels in reference to the Australian Height Datum and extending into the adjoining properties;</li> <li>(ix) details of any areas where surplus soils are to be stockpiled;</li> <li>(x) detailed protection measures to: <ul style="list-style-type: none"> <li>a. ensure adjoining properties and roads are not impacted by the ponding or nuisance stormwater resulting from earthworks associated with the approved development;</li> <li>b. preserve adjoining properties, assets and services including all drainage structures from structural loading impacts resulting from earthworks associated with the approved development;</li> </ul> </li> <li>(xi) where earthworks disturb contaminated land (as defined under the EP Act), evidence of consistency with the site suitability statement submitted under Condition MCU 5 of this approval.</li> </ul> <p>(b) Carry out excavation and basement work in accordance with the certified Excavation and Basement report and the detailed design drawings, sections and Construction Plans approved under part a) of this condition.</p> <p>(c) Submit to EDQ IS:</p> <ul style="list-style-type: none"> <li>(i) RPEQ certification that excavation and basement work has been undertaken in accordance with part a) of this condition; and</li> <li>(ii) RPEQ certified 'as-constructed' drawings and Post-Construction Certification form for the excavation and basement work carried out in accordance with part a) of this condition.</li> </ul> <p><i>Note: When submitting 'as constructed drawings', the preferred format is one letter/certificate listing all drawings and signed by the appropriate RPEQ for each discipline of engineering.</i></p>	<p>b) at all times</p> <p>c) prior to commencement of use</p>

## 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 4** below provides an assessment of the proposed changes against the criteria for substantially different development.

**Table 4** – 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 minor changes to the approval pile design and proposed optional raft design will not result in any non-compliance with the current intent of the development or reduce any capacity to service the intended catchment area.
<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 changes 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 proposal is related to the structural foundation of the development and the proposed alternative design options are supported by the Engineers and do 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.

Guideline Criteria	Response
<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 D**.

## 8. AMENDMENT APPLICATION FEE

Economic Development Queensland's *Development Assessment Fees and Charges Schedule (24-25)* 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 amendment application fee was \$13,425, we would like to kindly request EDQ to honour the same amendment application fee for this current Amendment Application.

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 (Senior Consultant) on 07 3007 3518.

Kind regards,



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