

Date: 7 April 2026

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Attention: Leila Torrens

Economic Development Queensland
GPO Box 2202
Brisbane QLD 4001

Dear Leila,

**REQUEST TO CHANGE PEET FLAGSTONE PDA DEVELOPMENT APPROVAL DEV2023/1414
SECTION 99 OF ED ACT – FLAGSTONE CITY: CA3 SOUTH – SCHOOL RAL (DEV2023/1414)**

We act on behalf of *Peet Flagstone City Pty Ltd* regarding the development approval over New Beith Road and Everdell Road, New Beith formally described as Lot 911 on SP356636 (formerly part Lot 989 on RP854074, Lot 911 on SP321079 and Lot 908 on SP316978) (EDQ ref: DEV2023/1414).

This development approval is for the following aspects of development:

- **PDA Development Permit for Reconfiguring a Lot** – Subdivision (3 lots into 4 lots, access easement and new roads)

It is proposed to make a minor amendments to the latest approval package issued by EDQ on 18 December 2025 (EDQ Ref: DEV2023/1414), pursuant to Section 99 of the *Economic Development Act 2012* (the Act).

The approval established the lot and access arrangements for the CA3 South School RAL independently of the CA3 South subdivision approval, which is also approved to establish the school lot and access arrangements. The proposed changes seek to align the School RAL approval with the recently submitted CA3 South response to further issues which will create a revised road layout and changes to the school site area based upon wider changes to CA3 South. The amendments to the New Beith Road / Flagstonian Drive intersection reflect what is proposed in the CA3 South change application response to further issues with little to no impact on the School RAL. It is expected that the intersection is delivered under the CA3 South approval rather than the School RAL approval given the timing of delivery for the surrounding residential stages. Additionally, the application seeks to revise the timing of the delivery of Stage 2.

The changes to the school site area maintain the school site at an area of greater than seven (7) hectares which is the Department of Education (DoE) requirement for greenfield state primary schools in Priority Development Areas (PDA's).

The changes do not increase the yield nor do they significantly impact upon the traffic flow of the development. The changes also do not impact upon infrastructure provision. Changes to approved plans are as a result of the proposed amendments to the layout. No changes to conditions or the approval description are proposed or required.

Overall, the changes are not considered to result in a substantially different development from that which is approved.

Further information regarding the proposed changes are included in the sections below.

1 Proposed Changes

The CA3 South school reconfiguring a lot (RAL) approval was sought prior to the CA3 South RAL to provide the DoE flexibility over the time the school site was created, accessible and delivered. Whilst the application was being assessed, the CA3 South RAL application was lodged and approved meaning that the school site was able to be created, accessed and delivered under the CA3 South RAL approval.

Subsequent to the CA3 South RAL approval, the School RAL approval was granted in December 2025 permitting the school site to be created independently of the CA3 South RAL approval. Amendments to the design of the CA3 South RAL layout in the vicinity of the school site now result in changes to the School RAL approval to account for changes to lot areas and road layouts across Stages 1 and 2 of the approval. A change application for CA3 South is currently underway assessing the changes to the design.

The School RAL approval is split into two stages as follows:

- Stage 1 – creation of school allotment and temporary easement providing access to the allotment.
- Stage 2 – creation of formal road network to the site.

The amendments seek to change both Stage 1 and 2 RAL plans.

The Stage 1 RAL plan is proposed to be amended to reflect revised areas of the school site based upon the eventual surrounding road network that has been redesigned and included within the current CA3 South RAL change application.

1.1 Stage 1 Plan Changes

The areas in **Table 1** describe the areas of school across the relevant applications and approvals.

Table 1: School site area

Application / Approval	School RAL approval	CA3 South Change Application	Proposed School RAL Change Application
School site areas	70,840m ² (7.084ha)	70,610m ² (7.061ha)	70,400m ² (7.040ha)

It is noted that the CA3 South Change Application layout including the school, which was recently lodged to EDQ, proposed a school site layout which is greater in area than the proposed School RAL layout within this application. The difference in areas is because the CA3 South Change application proposed not to widen the 20.2m wide Neighbourhood Connector along the northern boundary of the school site to 21m in width like the Neighbourhood Connector road along the western boundary of the school site and other parts of CA3 South.

The Neighbourhood Connector to the north of the school will be widened to 21m as part of the next CA3 South Change application which will result in a 0.8m land take along the northern boundary of the school for a distance of 252.3m. This will result in an approximate 200m² reduction in the land area for the site which will match the proposed School RAL Change application area of 70,400m².

It is noted that the school site area remains above the required 7ha minimum established by DoE for State Primary Schools in greenfield areas. It is noted that the temporary access easement only increases in area by 5m² to account for minor design changes to its alignment.

Refer to **Attachment C – RAL Plan Set (Rev D)** for further details.

1.2 Stage 2 Plan Changes

Stage 2 of the School RAL is proposed to be amended to reflect the revised road network providing access to the school site. The road network is established as part of the CA3 South Change application that was recently lodged to EDQ. The road network in this part of the site is approved and will not be changed again as part of further applications due to its imminent delivery.

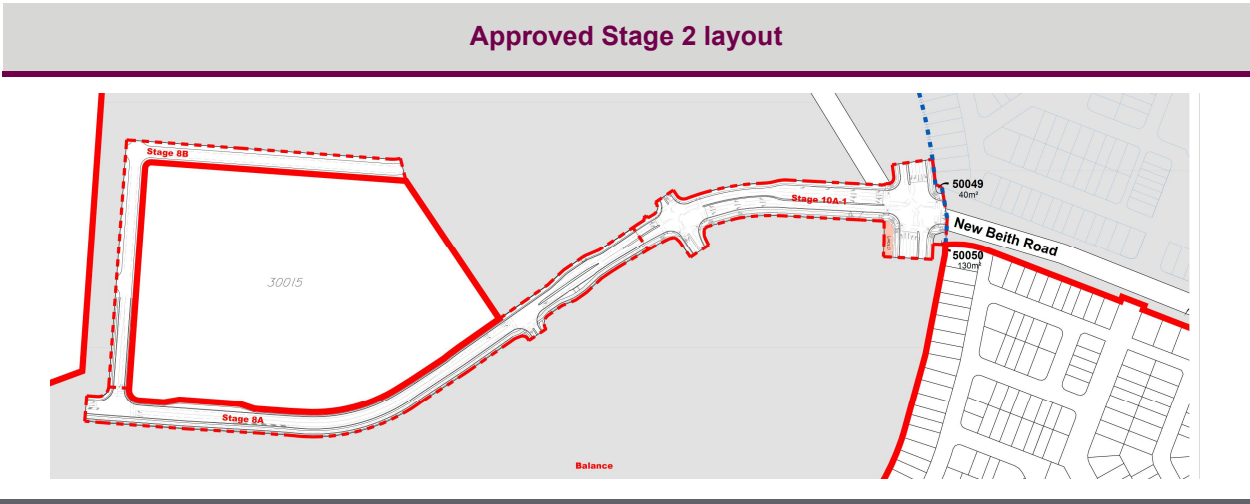
In particular, the following changes to the CA3 South road network have been included within the School RAL layout plans:

- 20.2m wide Neighbourhood Connector amended to 21m in width to the north and west of the school site.
- 23.7m wide Trunk Connector (Flagstonian Drive extension) amended to 23.8m in width to the south of the school extending to the Flagstonian Drive / New Beith Road intersection to the east.
- Changes to the functional design of Flagstonian Drive design south of the school site as a consequence of changes to the CA3 South approval.
- Changes to the Flagstonian Drive / New Beith Road intersection to the east based upon detailed design, intersection capacity requests from EDQ and advice from Logan City Council.
- Removal of the entry statement lot (Lot 50050) on the south-eastern corner of the intersection because of changes to the slip lane design.
- Inclusion of a small allotment (Lot 50050) for the containment of the Wyaralong interconnector along the alignment of New Beith Road to the south-west of the intersection.
- Changes to the balance land within Stages 2-5 of Flagstone to account for the delivery of Stage 5T which the section of Flagstonian Drive which provides access to CA3 South.

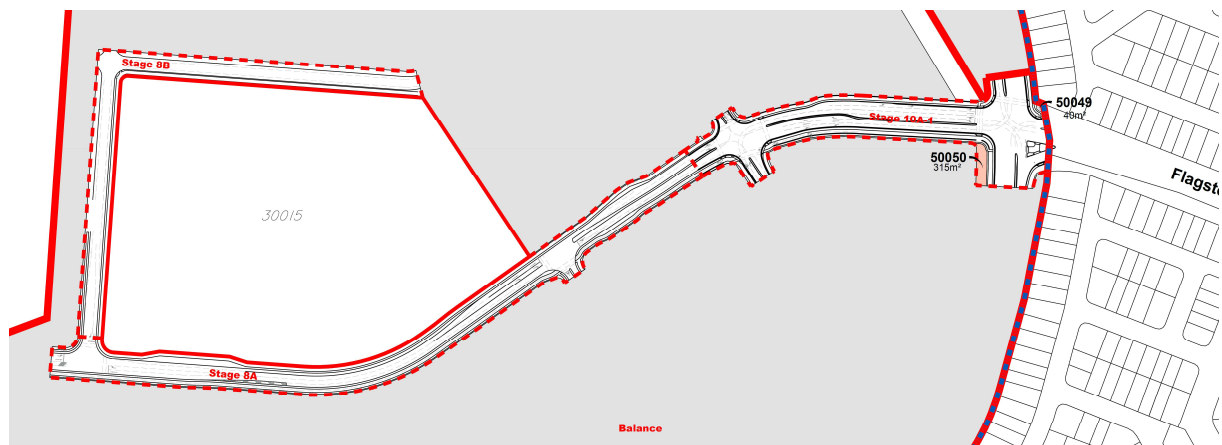
The changes to the design are provided in **Table 2** below. Refer to **Attachment C – RAL Plan Set (Rev D)** for further details.

Changes to the intersection design are also captured within the CA3 South Change application but have additionally been included within this application. The changes are supported by **Attachment D – Bitzios Traffic Memo** which assesses the turn movements, design and capacity of the Flagstonian Drive and New Beith Road intersection.

Table 2: Proposed changes to Stage 2 layout



Proposed Stage 2 layout



1.3 Stage 2 Delivery Timeframes

Stage 2 is conditioned to be carried out prior to 30 November 2027 under the timing for condition 1 of the approval. Furthermore, the servicing of the school site (Lot 30015) is proposed to occur prior to the same date, 30 November 2027, per the timing for condition 29.

Having more closely reviewed the delivery timeframes provided by the Department of Education, PEET seeks to revise the date by which the external roads and servicing to the school site are provided. Construction timeframes for the delivery of the Stage 8A and 8B roads and the associated service connections are not scheduled until late 2027 or early 2028. Accordingly, it is proposed to amend the timing of conditions 1 and 29 to ensure compliance with a revised date being 30 June 2028.

To manage access, coordinate construction and service to the necessary standards, PEET propose to establish regular project management working groups to support the revised date of 30 June 2028. It is expected that the revised date will not delay the construction or opening of the school which is slated for January 2029 as access to the site allowing the commencement of construction is still required to be provided by 30 November 2026.

2 Amendments to Decision Notice

2.1 Approved Plans and Documents

The proposed change seeks to supersede Revision C of the approved RAL Plan Set, as detailed below (~~deletions~~ / **additions**):

Table 3: Changes to approved plans and documents

	Plan / Document Name	Reference Number	Prepared by	Date
1	Primary School Site – Proposed Phase 1 Subdivision (school Allotment and Temporary Access Easement)	110056-537, Rev C Rev D Sheet 1	RPS	28 November 2025 (as amended in red) 31 March 2026
2	Primary School Site – Proposed Phase 1 Subdivision (school Allotment and Temporary Access Easement)	110056-537, Rev C Rev D Sheet 2	RPS	28 November 2025 (as amended in red) 31 March 2026
3	Primary School Site – Proposed Phase 2 Subdivision (New Road and Balance Lot)	110056-538, Rev C Rev D Sheet 1	RPS	28 November 2025 (as amended in red) 31 March 2026
4	Primary School Site – Proposed Phase 2 Subdivision (New Road and Balance Lot)	110056-538, Rev C Rev D Sheet 2	RPS	28 November 2025 (as amended in red) 31 March 2026

2.2 Approved Conditions

Changes to the timing of conditions 1 and 29 are proposed in **Table 4**.

Table 4: Changes to approved conditions

PDA Development Conditions		
No	Condition	Timing
1.	Carry out the approved development Carry out the approved development generally in accordance with: a) the approved plans and documents; and b) any other documentation endorsed via Compliance Assessment as required by these conditions.	For Stage 1, survey plan endorsement is to occur prior to 30 November 2026, and For Stage 2, survey plan endorsement is to occur prior to 30 November 2027 30 June 2028 .
29.	Land transfers – State community facilities Transfer, in fee simple, to the State of Queensland (represented by the Department of Education), Lot 30015 as shown on the approved plans for education purposes.	Lot 30015 is to be transferred to the State of Queensland by 30 November, 2026.

PDA Development Conditions

Lots to be transferred under this condition must be serviced in accordance with the DCOP for Flagstone and the Greater Flagstone infrastructure planning and background report

Servicing of Lot 30015 is to occur with Stage 2, prior to ~~30 November, 2027~~ **30 June 2028**.

2.3 Approval Description

No change is required or proposed to the approval description.

3 Substantially Different Development Test

It is considered that the proposed changes to the development application would not result in “*substantially different development*” when considering the individual circumstances of the development in the context of the changes proposed.

It is noted that the application is subject to Section 99 of the *Economic Development Act 2012*, which states that a change to an approval may be made only if the change would not result in the development being ‘substantially different’, which is the same term used for the definition of a ‘minor change’ under the *Planning Act 2016*. In the absence of any PDA specific guidance, Schedule 1 of the Development Assessment (DA) Rules is used in assessing the amendment application in this instance.

An assessment of the proposed changes against the “substantially different development” criteria is provided in Table 5.

Table 5: Substantially Different Development Criteria

DA Rules, Schedule 1 Test	RPS Comments
<i>involves a new use</i>	The change does not introduce any new uses.
<i>results in the application applying to a new parcel of land</i>	The change application does not include additional land.
<i>dramatically changes the built form in terms of scale, bulk and appearance</i>	The change to the application proposes slightly different lot boundaries and road areas. No built form changes are proposed.
<i>changes the ability of the proposed development to operate as intended</i>	The proposed change does not change the ability for the development to operate as a subdivision to create a school allotment.
<i>removes a component that is integral to the operation of the development</i>	The change application does not remove any component of the development that is integral to its operation.
<i>significantly impacts on traffic flow and the transport network, such as increasing traffic to the site</i>	The change application does not introduce new uses or additional lots as part of this change. The revised Flagstonian Drive / New Beith Road intersection design has undergone design review with Logan City Council and has been amended to reduce the degree of saturation from a traffic modelling standpoint. The intersection introduces a second slip lane from east to south whilst maintaining all other movements. The amended layout reflects the changes in the CA3 South further issues response and does not increase traffic to the site. The changes will not have significant impacts on traffic flow.
<i>introduces new impacts or increase the severity of known impacts</i>	The change application does not introduce any new impacts or exacerbate the effect of any known impacts on the development.
<i>for a development prescribed by the Planning Regulation as requiring social impact assessment as identified under section 106T of the Act –</i> Introduces new social impacts or increase the severity of known social impacts; or	Not applicable to the proposed development.
<i>removes an incentive or offset component that would have balanced a negative impact of the development</i>	The change application does not remove an incentive or offset component that would have balanced a negative impact of the development.
<i>impacts on infrastructure provisions.</i>	The change application will not impact on infrastructure provision. New Beith Road and services are to be delivered on schedule. The revised date of the delivery of Stage 2 does not result in a change to the provision of infrastructure (school).

4 Owners Consent

The land subject to this application was formerly described as part Lot 989 on RP854074, Lot 911 on SP321079 and Lot 908 on SP316978. The subject land is currently comprised of one lot being Lot 911 on SP356636 as a result of management subdivisions and the creation of residential stages to the east of the site. Consent for this land is provided within **Attachment B** – Landowner's Consent.

5 Application Fee

The proposed application fee has been determined to be \$4,695.00 based upon recent change applications in the current financial year and the limited extent of the proposed amendments. The fee is to be confirmed by EDQ and Peet will subsequently provide written consent for the fee to be taken from the masterfund. RPS will coordinate this process.

6 Summary

As detailed within this letter, the proposed amendment application seeks to make an amendment to the approved development, in particular in the subdivision layouts of the CA3 South school site including changes to the road network providing access to the site. Additionally, the change seeks to revise the timing for the delivery of Stage 2. The application seeks to reflect changes made to the CA3 South change application response to further issues. The development will not result in 'substantially different development'.

We ask that EDQ now proceed with the assessment of the request to amend the development approval and accordingly enclose the following documentation.

- **Attachment A** – MEDQ Development Application Form
- **Attachment B** – Landowner's Consent
- **Attachment C** – RAL Plan Set (Rev D)
- **Attachment D** – Bitzios Traffic Memo

We trust this information is sufficient for your purposes. Should you require any further details or clarification, please do not hesitate to contact the undersigned or Emma Gurney by telephone on 07 3539 9692.

Yours sincerely,
for RPS AAP Consulting Pty Ltd



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