

Our ref: AU011700

Level 8, 31 Duncan Street
Fortitude Valley QLD 4006
T +61 7 3539 9500

Date: 30 June 2026

Attn: Stephen Glowacz
Economic Development Queensland (EDQ)
GPO Box 2202
Brisbane QLD 4001

Dear Sir / Madam,

Change Application for PDA Development Approval (DEV-2026-STH-4196)
Section 99 of the *Economic Development Act 2012*
62-74, 76-94, 96-108, 110-118, 120-122, 124-138 Springacre Road, Thornlands QLD 1464
Lots 13, 14 and 16 on RP53653; Lots 1 and 2 on RP128089 and Lot 2 on SP355573

We, RPS AAP Consulting Pty Ltd, write on behalf of *Mirabel Thornlands Pty Ltd* (the Applicant) regarding PDA development approval DEV-2026-STH-4196, dated 3 June 2026, which comprises:

- Reconfiguring a Lot – 6 Lots into 169 residential lots, 3 open space lots, 1 infrastructure lot, 2 bio-retention basin lots, 3 balance lots in stages and Material Change of Use for a Plan of Development.

Pursuant to Section 99 of the *Economic Development Act 2012*, an amendment application is hereby submitted to change the abovementioned development approval.

In short, the purpose of this amendment application is to refine the approved detention basin lot boundaries within the riparian corridor area, pursuant to the outcomes of site-based stormwater management reporting provided alongside this application. This amendment application also seeks to satisfy Conditions 22(a) and 25 of the approval and includes the following attachments:

- **Attachment A** – Form, CT Searches & Consent;
- **Attachment B** – Site-based Stormwater Management Plan;
- **Attachment C** – Revised Plan of Subdivision and Plan of Development;
- **Attachment D** – Revised Landscape Concept Plan; and
- **Attachment E** – Revised Civil Engineering Plans.

In addition to the above changes to lot sizes within the riparian corridor area, this amendment application also seeks to adjust the landscaping treatment within the verges of the Centre Connector street. More information on both proposed changes is provided in the below sections.

This letter confirms that the proposed amendments are minor in nature and do not constitute substantially different development.

1 Overview of Amendments

1.1 Detention Basins

As highlighted above, this amendment application is made in accordance with a Site-Based Stormwater Management Plan (SBSMP) prepared by Engeny and enclosed at **Attachment B**. The SBSMP has been prepared to satisfy Condition 22(a) of the approval which reads as follows:

22. Stormwater Management – Riparian Corridor - Compliance Assessment

- (a) Submit to EDQ for Compliance Assessment a revised Site Based Stormwater Management Report and associated engineering design drawings, certified by an RPEQ, generally in accordance with:
- PDA Guideline No. 13 Engineering standards – Stormwater quantity, and
 - A “no detention” strategy for catchments discharging to Eprapah Creek (SPP 2017 Waterway Stability Management objectives must still to be demonstrated for peak 1 year ARI).

The SBSMP prepared by Engeny is in accordance with the requirements of PDA Guideline No. 13 and comprises a “no detention” strategy for stormwater discharge into Eprapah Creek, utilising a series of bio-retention basins which are typically smaller than the previously anticipated stormwater infrastructure. As such, opportunity exists for the reduction of the detention basin lot sizes, allowing for increased land for open space purposes within the riparian corridor area.

The below figures include a side-by-side depiction of the approved and revised bio-retention basin arrangements. A full copy of the Revised Civil Drawings is included as **Attachment E**.

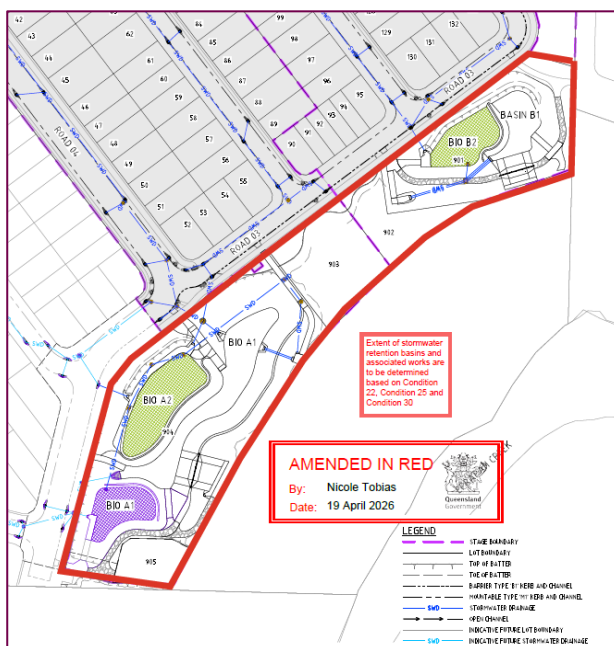


Figure 1: Approved detention basin arrangement

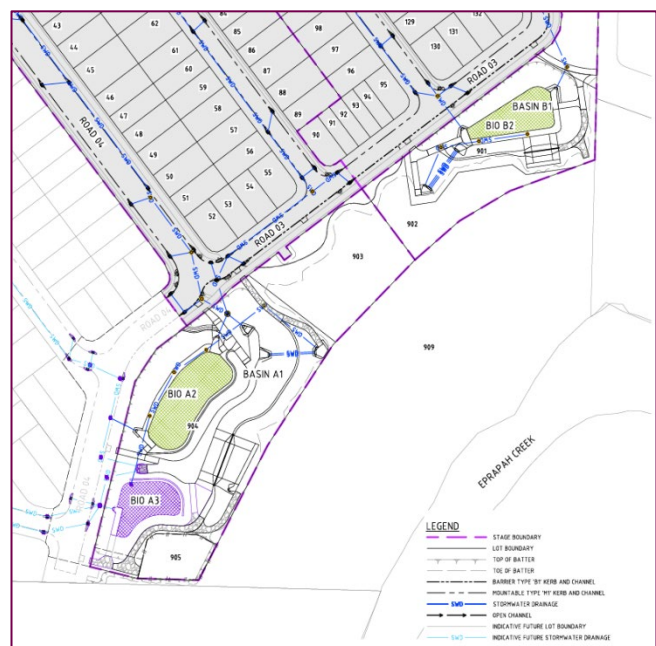


Figure 2: Revised detention basin arrangement

In order to satisfy the requirements of Condition 25 of the approval, an updated Plan of Subdivision is provided at **Attachment C** depicting reduced footprints for the detention basin lots (Lots 901 & 904) and increased footprints for the open space lots (Lots 902 & 903). It is noted that no changes are proposed to the sewerage pump station lot, which will remain accessed by an easement burdening Lot 904.

The below figures include a side-by-side depiction of the approved and revised Plans of Subdivision.



Figure 3: Approved Plan of Subdivision

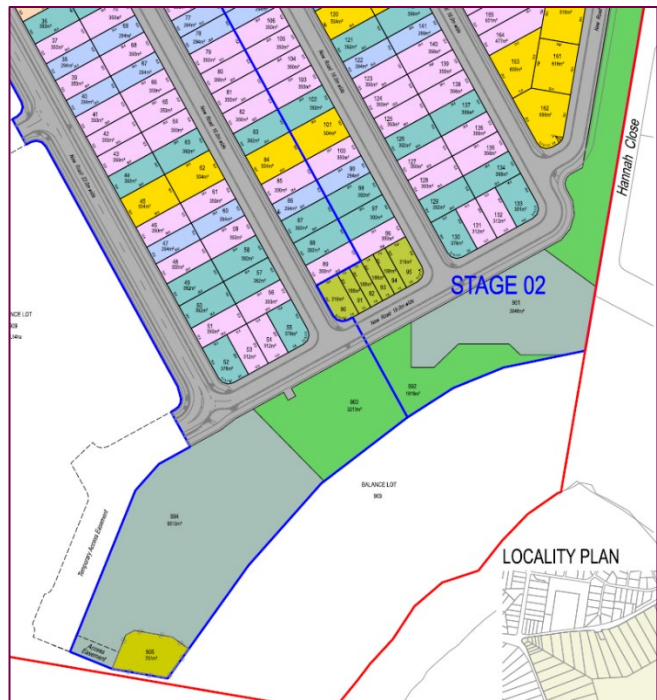


Figure 4: Revised Plan of Subdivision

In addition to the revised Plan of Subdivision, this amendment application also provides a revised Landscape Concept Plan which consolidates the development-wide Landscape Concept Plan with the Erapah Creek specific landscape plans included under the approval. It is thus intended that the revised Landscape Concept Plan supersedes both the following approved documents:

- Erapah Creek Riparian Corridor (amended in red) - Revision A - AS Design Landscape Architecture - April 2026; and
- Landscape Concept Report - Stages 1 & 2 of Precinct 1 (amended in red) - Revision C - AS Design Landscape Architecture - April 2026.

In terms of changes to landscaping within the riparian buffer area, the revised landscape plan includes:

- Slightly smaller footprints for bio-retention basins and more efficient use of space for detention lots in accordance with refined stormwater management reporting;
- Additional open space for tree retention and restoration purposes between the detention lots;
- A smaller detention basins on Lot 904 and Lot 901; and
- Rearranged open space areas along the road frontage to site a PMT.

The below figures include a side-by-side depiction of the approved and revised Landscape Plans for the riparian buffer area. Refer to **Attachment D** for a full copy of the revised Landscape Concept Plan.

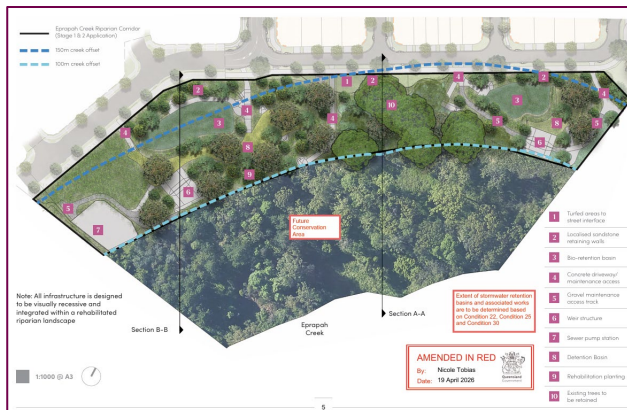


Figure 5: Approved Erapah Creek Buffer Landscaping

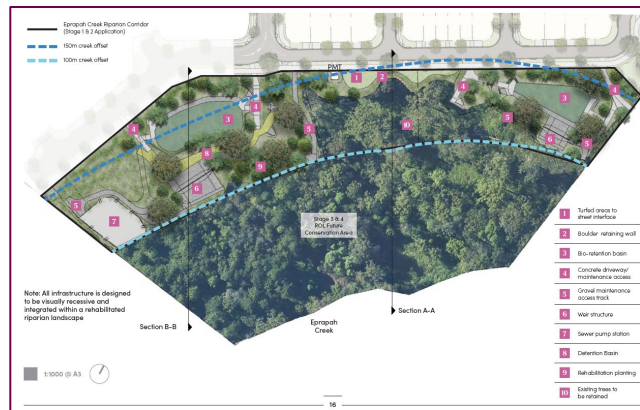


Figure 6: Proposed Erapah Creek Buffer Landscaping

1.2 Entry Road Pathway Width

In addition to the above changes, this amendment application also seeks to alter the verges of the Centre Connector street to incorporate landscaping on both sides of the footpath, for both sides of the road. The proposed change maintains 3m footpath pavement widths, though relocates a 1m width of landscaping from the roadside to sit between the footpath and adjoining properties.

This proposed change results in a contiguous 1m landscaping strip extending from the site entry through to the roundabout and is considered to be an improved landscaping outcome for the site's entrance, as it will soften the transition to built form associated with the future mixed-use buildings that will eventually adjoin the street.

The below figures include a side-by-side depiction of the approved and revised cross sections for the Centre Connector street. Refer to **Attachment D** for a full copy of the revised Landscape Concept Plan.

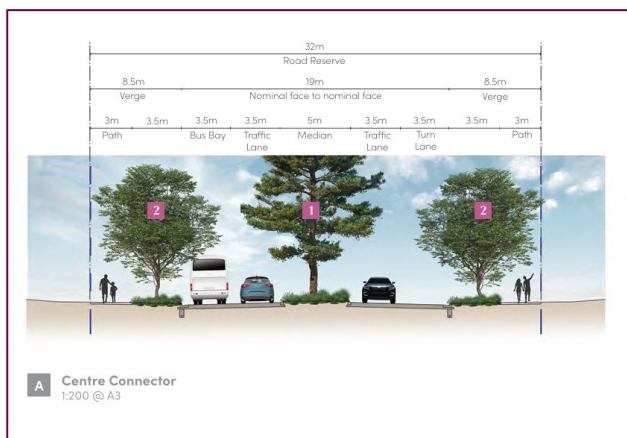


Figure 7: Approved Centre Connector Cross-section

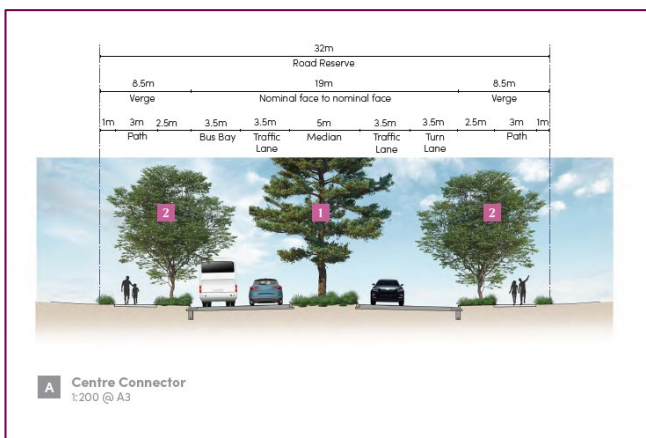


Figure 8: Revised Centre Connector Cross-section

1.3 Changes to Bulk Earthworks Plans & Civil Drawings

The Revised Civil Drawings including bulk earthworks are included as Attachment E, these include an update to the approved Bulk Earthworks plans and detailed design information regarding engineering design. In particular there have been design amendments to reflect the new design for the basins in the open space, and the interface along the northern boundary of Stages 1 and 2 with future open space. The proposed earthworks in this location have been amended in consideration of the requirements within the approval conditions for compliance with Redland City Council preferences related to use and design of retaining walls within parks.

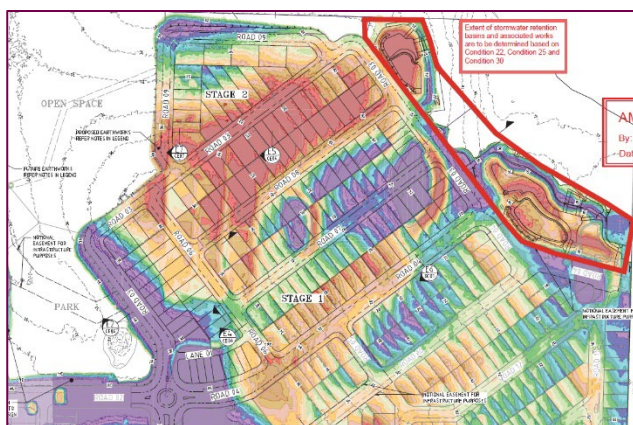


Figure 9: Approved Earthworks Plans



Figure 10: Revised Earthworks Plans

2 Changes to the Approval

This section provides a list of the changes required to the current PDA Development Approval package (**removals** / **insertions**).

2.1 Approved Plans and Documents

Table 1 below identifies the plans or other documents which are already approved, but which should be replaced to reflect the currently proposed amendments to the development layout.

Table 1: Amended Approval Plans

Plan / Document No.	Description	Prepared By	Date
1- Southern Thornlands Precinct 1	STP01-RaL1 (Sht 1 of 3)	Place Plan	09/04/2026
1. Reconfiguration of a Lot – Application 1 (amended in red)	STP01-RaL1 (Sht 1 of 3)	Place Plan	24/06/2026
Southern Thornlands Precinct 1 Reconfiguration of a Lot – Application 1			
2- Southern Thornlands Precinct 1	STP01-RaL1 (Sht 2 of 3)	Place Plan	09/04/2026
2. Reconfiguration of a Lot – Application 1	STP01-RaL1 (Sht 2 of 3)	Place Plan	24/06/2026
Southern Thornlands Precinct 1 Reconfiguration of a Lot – Application 1			
3- Southern Thornlands Precinct 1	STP01-RaL1 (Sht 3 of 3)	Place Plan	09/04/2026
3. Reconfiguration of a Lot – Application 1 (amended in red)	STP01-RaL1 (Sht 3 of 3)	Place Plan	24/06/2026
Southern Thornlands Precinct 1 Reconfiguration of a Lot – Application 1			
4- Southern Thornlands Precinct 1 Plan of Development – Application 1 (amended in red)	STP01-POD1 (Sht 1 of 5)	Place Plan	08/05/2026
4. Southern Thornlands Precinct 1 Plan of Development – Application 1 (amended in red)	STP01-POD1 (Sht 1 of 5)	Place Plan	24/06/2026
Southern Thornlands Precinct 1 Plan of Development – Application 1 (amended in red)			
5- Southern Thornlands Precinct 1 Plan of Development – Application 1	STP01-POD1 (Sht 2 of 5)	Place Plan	08/05/2026
5. Southern Thornlands Precinct 1 Plan of Development – Application 1	STP01-POD1 (Sht 2 of 5)	Place Plan	24/06/2026
Southern Thornlands Precinct 1 Plan of Development – Application 1			
6- Southern Thornlands Precinct 1 Plan of Development – Application 1 (amended in red)	STP01-POD1 (Sht 3 of 5)	Place Plan	08/05/2026
6. Southern Thornlands Precinct 1 Plan of Development – Application 1 (amended in red)	STP01-POD1 (Sht 3 of 5)	Place Plan	24/06/2026
Southern Thornlands Precinct 1 Plan of Development – Application 1 (amended in red)			

Our ref: AU011700

	Plan / Document No.	Description	Prepared By	Date
7.	Southern Thornlands Precinct 1 Plan of Development—Application 1 (amended in red)	STP01-POD1 (Sht 4 of 5)	Place Plan	08/05/2026
7.	Southern Thornlands Precinct 1 Plan of Development – Application 1 (amended in red)	STP01-POD1 (Sht 4 of 5)	Place Plan	24/06/2026
8.	Southern Thornlands Precinct 1 Plan of Development—Application 1 (amended in red)	STP01-POD1 (Sht 5 of 5)	Place Plan	08/05/2026
8.	Southern Thornlands Precinct 1 Plan of Development – Application 1 (amended in red)	STP01-POD1 (Sht 5 of 5)	Place Plan	24/06/2026
9.	Fauna Management Plan - Southern Thornlands Priority Development Area Precinct 1- Application 1 (amended in red)	0588-002b Version 0	BAAM Ecological Consultants	17/12/2025
10.	Traffic Impact Assessment	620.040303.00004 Revision 2	SLR Consulting	17/12/2025
11.	Earthworks Overall Layout Plan (amended in red)	B00702-DA-CE01 Rev C	Empower	07/05/2026
11.	Earthworks Overall Layout Plan	B00702-DA-CE01 Rev F	Empower	19/06/2026
<i>Supporting plans and documents</i>				
12.	Civil Engineering & Servicing Report for Reconfiguring a Lot (RAL) (amended in red)	B00702-Revision A	Empower	12/12/2025
	[Keep report, supersede Civil Engineering Drawings package with Item 19 below]			
13.	PDA Sewer Strategy	-	EDQ	3/6/2026
14.	Eprapah Creek Riparian Corridor (amended in red)	Revision A	AS Design Landscape Architecture	April 2026
	[Consolidated into revised Landscape Concept Plan below]			
15.	Eprapah Creek Riparian Corridor – Vegetation Management and Rehabilitation plan (amended in red)	0588-001d Version 0	BAAM Ecological Consultants	08/04/2026
16.	Landscape Concept Report – Stages 1 & 2 of Precinct 1 (amended in red)	Revision C	AS Design Landscape Architecture	April 2026
16.	Landscape Concept Report – Stages 1 & 2 of Precinct 1	Revision D	AS Design Landscape Architecture	June 2026
17.	Bushfire Management Plan (amended in red)	003.06.25 Rev 2	Bushfire Risk Reducers	1 April 2026
18.	Site-Based Stormwater Management Plan	BNE01174_0005-REP-001-2	Engeny	22 June 2026
19.	Civil Engineering Drawings - SOUTHERN THORNLANDS PRECINCT 1 - ST 1 & 2 RAL APPLICATION	B00702-DA-CG01 Rev C – B00702-DA-CM03 Rev C	Empower	19/06/2026

2.2 Conditions

The proposed changes are limited to the approved plans of development. No changes are proposed or required to the PDA Development Conditions.

Notwithstanding, this application is made in part to satisfy Conditions 23(a) and 25 of the approval. We request that EDQ provide written advice confirming fulfilment of these conditions upon deciding this application, or alternatively amend the conditions to remove the requirement to reference the newly approved reports instead.

3 Substantially Different Test

Section 99 of the *Economic Development Act 2012* (EDA) states that a change to an approval may be made only if the change would not result in the development being 'substantially different'. As The Act and supporting guidelines do not set out any criteria, Schedule 1 of the DA Rules under the *Planning Act 2016* has been referenced in this instance. Schedule 1 states that a change may be substantially different if one or more of the following criteria in below table apply.

Table 2: Substantially Different Test

Criteria	Response
(a) involves a new use; or	The proposed changes are not for a new use.
(b) results in the application applying to a new parcel of land; or	The proposed changes do not introduce new land.
(c) dramatically changes the built form in terms of scale, bulk and appearance; or	The proposed changes are requested in response to the requirements of the approval conditions and seek a reduction in detention basin sizes and footpath widths only and do not result in dramatically changing the development's built form.
(d) changes the ability of the proposed development to operate as intended; or	The proposed changes do not change the ability of the proposal to operate as intended. The proposed reduction in detention basin lot footprints allows for more useable open space within the riparian area.
(e) removes a component that is integral to the operation of the development; or	The proposed changes do not remove a component that is integral to the development.
(f) significantly impacts on traffic flow and the transport network, such as increasing traffic to the site; or	The proposed changes do not impact on traffic flow and the transport network.
(g) introduces new impacts or increase the severity of known impacts; or	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; or	The proposed changes do not remove an incentive or offset component imposed on the development.
(i) impacts on infrastructure provisions.	The proposed changes will not impact on infrastructure provisions.

4 Owner's Consent

The proposed modifications relate to the land under the ownership of Mirabel Thornlands Pty Ltd (Lots 13, 14 & 16 on RP53653 & Lots 1 & 2 on RP12809) and Michael Colin Mellish (Lot 2 on SP355573). Owners' consent from Mirabel Thornlands Pty Ltd and Michael Colin Mellish is provided at **Attachment A**.

Accordingly, it is requested that EDQ accepts this application as properly made pursuant to Section 82(3)(b) of the *Economic Development Act 2012*.

Our ref: AU011700

5 Supporting Information

The following supporting information is attached:

- **Attachment A** – Form, CT Searches & Consent;
- **Attachment B** – Site-based Stormwater Management Plan;
- **Attachment C** – Revised Plan of Subdivision and Plan of Development;
- **Attachment D** – Revised Landscape Concept Plan; and
- **Attachment E** – Revised Civil Engineering Report.

We trust this information is sufficient for your purposes, however, should you require any further details or clarification, please do not hesitate to contact the writer or Joanne Cousins on 07 3437 2023.



Stewart Owen

Principal Planner

stewart.owen@rpsconsulting.com

+61 7 3539 9534

cc: Joanne Cousins – RPS
Brendan Hannan – Urbex
Thomas Hadden – Urbex