

19th August 2026



Our Ref: 25007.M01.001
EDQ Ref: DEV-2026-WGB-4573

Development Assessment
Economic Development Queensland
PO Box 15008
CITY EAST QLD 4002

Attn: Essen Joseph

Dear Essen,

**RE: REQUEST FOR CHANGE TO EXISTING DEVELOPMENT APPROVAL FOR MATERIAL CHANGE OF USE
ON LAND LOCATED AT 24 WILTON STREET, WOOLLOONGABBA. EDQ REF: DEV-2026-WGB-4573.**

This planning assessment accompanies a change application pursuant to Section 99 of the Economic Development Act 2012, in relation to subject site at 24 Wilton Street, Woolloongabba and described as Lot 4 on RP12250.

The existing approval (DEV-2026-WGB-4573) was issued on 1st May 2026. It involved Development Permit for Material Change of Use for Rooming Accommodation.

It is proposed to modify the current approval to reflect attached drawings and documents and corresponding amendments to relevant conditions.

The proposal seeks approval for a changed development in response detailed design requirements and to assist in project viability. The main change proposed is an increase to the building height and corresponding increase in overall number of rooming units.

1. PROPOSED CHANGES

As noted above, the primary modifications are mainly limited to building height and density. The building footprint, architectural design, and overall compliance with the current approval remain unaltered. Furthermore, no changes are proposed regarding vehicle access, the total number of parking spaces, or servicing provisions.

A summary of the main changes is outlined as follows:

- **Height & Density** – As shown in Figures 1-6 below, the building height has been increased from 6 storeys (plus rooftop communal) to 8 storeys (plus rooftop communal). This result in the overall number of rooming units increasing from 50 rooming unit to 67 rooming units. Building footprint remains unchanged.



Figure 1 – Revised Front Elevation



Figure 2 - Existing Approved Elevation



Figure 2 – Revised Rear Elevation



Figure 3 - Existing Approved Elevation



Figure 3 – Revised East Elevation



Figure 4 – Existing Approved East Elevation



Figure 4 – Revised West Elevation



Figure 6 – Existing Approved West Elevation

- **Ground level plan** – minor changes to the ground level layout include:
 - The deletion of 2 rooming units to provide additional communal room area.
 - Increase refuse storage area.
 - No changes are proposed to access and parking layout.

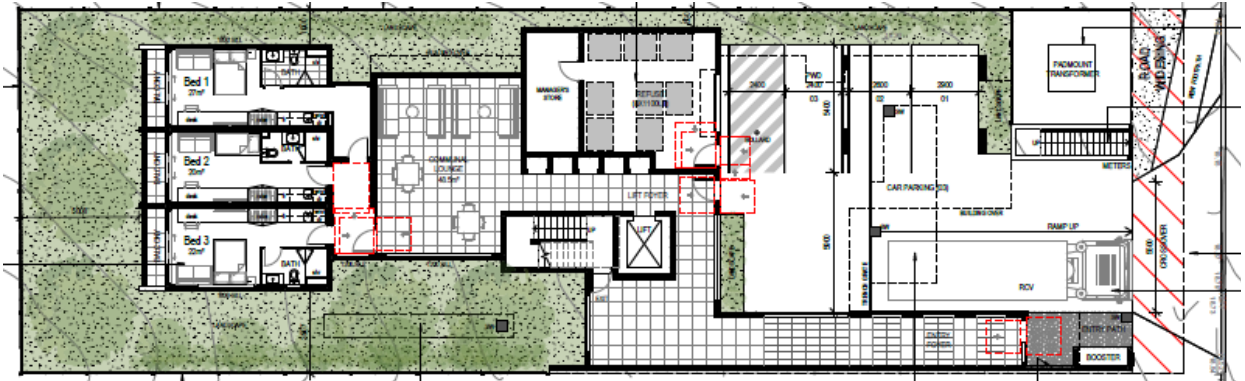


Figure 7 - Revised ground level

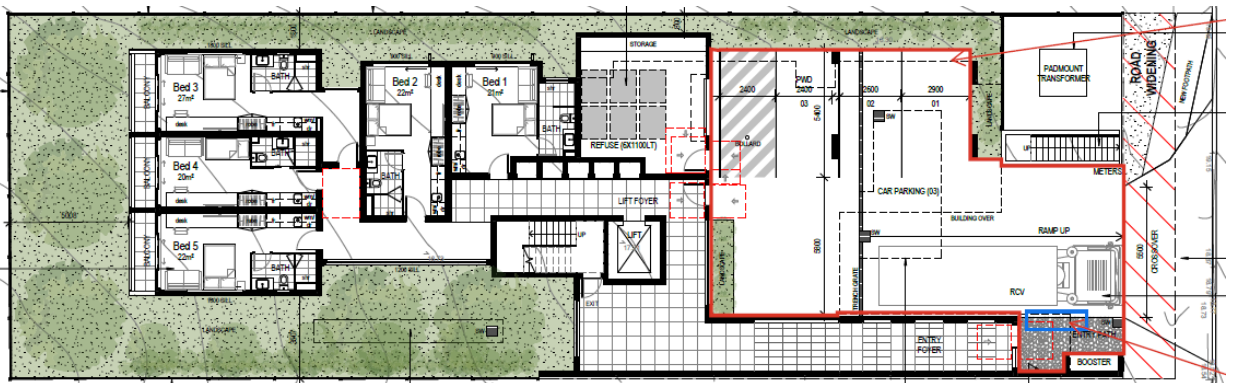


Figure 8 – Existing Approved ground level.

- **Level 1 plan** – minor changes to the ground level layout include:
 - Removal of 1 unit to provide an increased communal area.
 - Add partial front balcony to communal area.

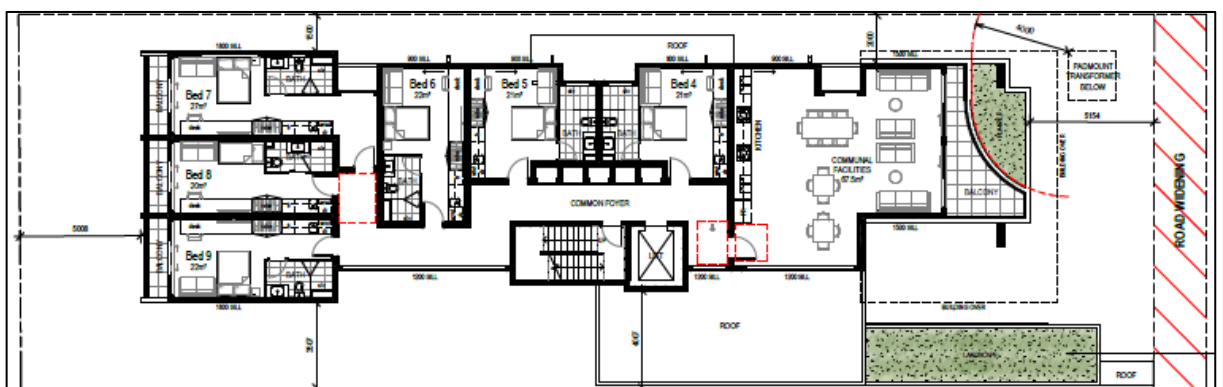


Figure 9 - Revised level 1

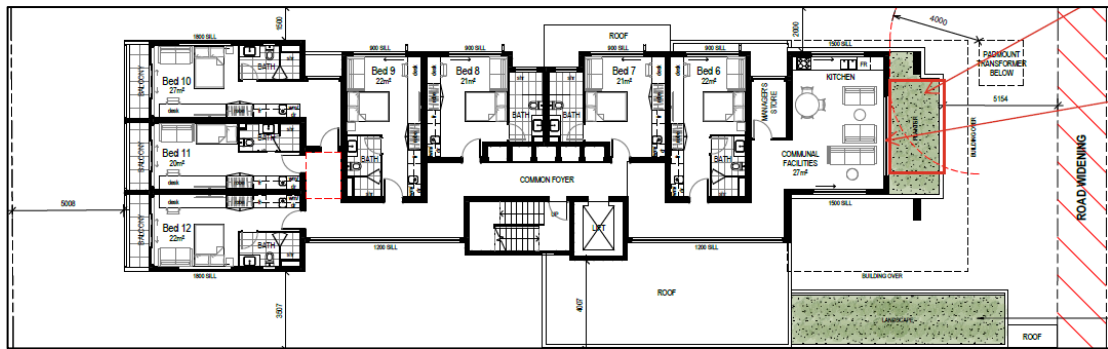


Figure 10 – Existing Approved level 1

- **Levels 2-5 plan** – Layout is same as the previous typical 10-room layout for levels 2-3.

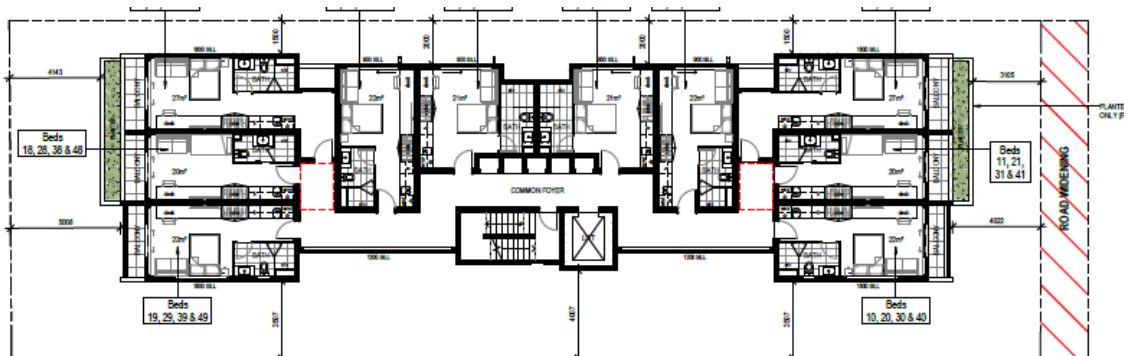
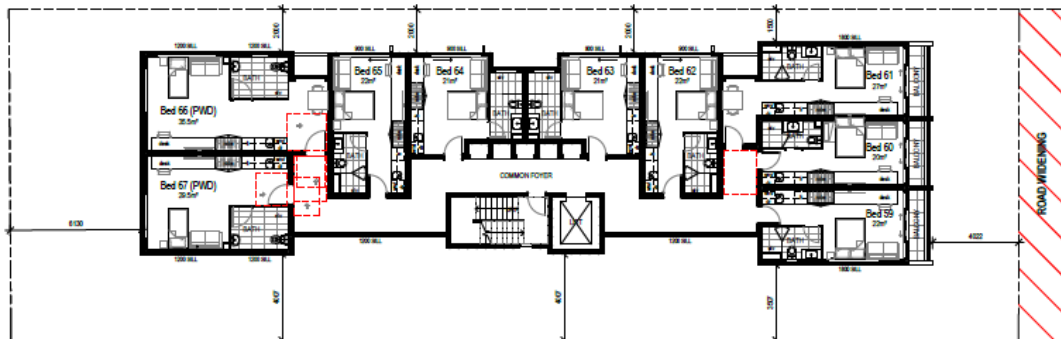


Figure 11 – Revised Typical level 2-5 layout

- **Levels 6** – New Layout for proposed level 6 showing a 9-room layout.



2. ASSESSMENT OF CHANGE

Pursuant to Section 99(2) of the Economic Development Act 2012, an application to change a Priority Development Area (PDA) development approval may be approved provided that the Minister for Economic Development Queensland (MEDQ) is satisfied the proposed amendment does not constitute a “substantially different” development. It is noted that the Economic Development Act 2012 (ED Act) does not define “substantially different”. As such, it is considered that the definition of “substantially different” development as provided in Schedule 1 of the Development Assessment Rules (DA Rules) provide an appropriate guide for consideration.

The following assessment demonstrates that the proposed development complies with the relevant criteria and does not constitute a “substantially different” development.

3. ASSESSMENT OF 'SUBSTANTIALLY DIFFERENT' DEVELOPMENT

- (a) *Involves a new use; or*

RESPONSE: The development remains as per the existing use for Rooming Accommodation.

- (b) *Results in the application applying to a new parcel of land; or*

RESPONSE: No additional parcels of land are proposed to be included.

- (c) *Dramatically changes the built form in terms of scale, bulk and appearance; or*

RESPONSE: The changes include additional building height. The architectural language remains consistent with the existing approval. No change is proposed to the approved design and materials of the building, with the presentation to the frontage and other elevations maintaining a similar appearance. The additional height remains well within the expected height for the precinct, and significantly lower than the envisaged 12–15 storey limit. As such it is not considered that the changes result in a dramatically different built form in terms of scale, bulk and appearance that could be expected within the precinct.

- (d) *Changes the ability of the proposed development to operate as intended; or*

RESPONSE: As previously discussed, the approved rooming accommodation use remains unchanged. The amendments, as outlined above, do not impact the operation of the development. The revised development maintains the approval communal open space areas as per existing approval and provides additional communal open spaces to cater for the additional density.

- (e) *Removes a component that is integral to the operation of the development; or*

RESPONSE: The proposed changes does not remove any components integral to the operation of the operation of the development, i.e. vehicular access, pedestrian access, servicing, communal area etc.

- (f) *Significantly impacts on traffic flow and the transport network, such as increasing traffic to the site; or*

RESPONSE: The site's proximity to high-frequency bus services and the upcoming Cross River Rail network aligns with Transit-Oriented Development (TOD) principles. The proposed amendments do not increase onsite parking. As such, the proposed changes do not impact on traffic flow or generation.

- (g) *Introduces new impacts or increase the severity of known impacts; or*

- (h) *Removes an incentive or offset component that would have balanced a negative impact of the development; or*

RESPONSE: The development is not considered to have a "negative impact". The abovementioned changes are also not considered introduce a new impact, increase the severity of a known impact, or remove an incentive / offset component.

- (i) *Impacts on infrastructure provisions.*

RESPONSE: As previously discussed, the building height (and corresponding density), is well below the precinct allowable limit. As such, there are no adverse impacts on infrastructure capacity or provisions.

4. CHANGES TO DRAWINGS/DOCUMENTS

With reference to the 'Drawings or Documents' schedule of the existing approval, we ask that this is updated to:

- *Architectural Plans* – All existing plans are to be replaced with the revised plans included in the Proposed Revised Plans attached in Appendix A.
- *Engineering Drawings* – No change is proposed to approved version
- *Landscape Concept Plan* - No change is proposed to approved version.
- *Traffic statement* – No change is proposed to approved version.
- *Site Based Stormwater Management Plan* – To be replaced with the updated with SBSMP attached in Appendix B.
- *Acoustic report* – As attached in Appendix C is be included.

The full list is set out in table below.

	Approved Ref No.	Modified Ref No.
Cover	DD A.001, Rev F	DD A.001, Rev H
Site Plan		DD A.002, Rev K
Floor Plans – Sheet 1	DD A.102, Rev H	DD A.102, Rev K
Floor Plans – Sheet 1	DD A.103, Rev G	DD A.103, Rev I
Floor Plans – Sheet 3	DD A.104, Rev G	DD A.104, Rev I
Elevations – Sheet 1	DD A.201, Rev E	DD A.201, Rev G
Elevations – Sheet 2	DD A.202, Rev E	DD A.202, Rev G
Elevations – Sheet 3	DD A.203, Rev E	DD A.203, Rev G
Landscape Concept Plan [Sheet 1]	LCP-1, Rev B	LCP-1, Rev B
Landscape Concept Plan [Sheet 2]	LCP-2, Rev B	LCP-2, Rev B
Landscape Concept Plan [Sheet 3]	LCP-3, Rev B	LCP-3, Rev B
Landscape Concept Plan [Sheet 3]	LCP-4, Rev B	LCP-4, Rev B
Concept Pre & Post Stormwater Catchment Plan	SK01, Rev B	SK01, Rev B
Concept Stormwater Drainage Plan	SK02, Rev B	SK02, Rev B
Concept Bulk Earthworks Plan	SK03, Rev B	SK03, Rev B
Concept Bulk Earthworks Sections	SK04, Rev B	SK04, Rev B
Concept Sewer and Water	SK05 Rev B	SK05 Rev B
Acoustic Assessment		8082_R2
SBSMP		C25068 Rev B

5. CHANGES TO CONDITIONS

Further to section 5 above, several conditions are required to be amended to reflect the proposed changes. These include conditions 4 and 5.

- **Condition 4** is to be amended to reflect the submitted Acoustic Assessment.
- **Condition 5** is to be deleted as the required balustrade treatment is dealt with by the submitted Acoustic Assessment and revised Condition 4.

Condition 4) Acoustic Impact Assessment and Mitigation Report	
Current Wording of Condition	a) <i>Submit to EDQ an Acoustic Impact Assessment and Mitigation Report demonstrating that the design for all proposed accommodation units, affected by Road traffic noise achieve the relevant internal maximum design sound levels. The report is to be prepared and certified by a suitably qualified and experienced person and address:</i> i. <i>The Brisbane City Plan 2014, Noise Impact Assessment Planning Scheme Policy; and</i> ii. <i>Australian Standard AS2107 "Acoustics – Recommended Design Sound Levels and Reverberation Times for Building Interiors" using the methods set out in Australian Standard AS3671 "Acoustics – Road Traffic Noise Intrusion Building Siting and Construction" by</i> b) <i>Design and construct the development to achieve compliance with the noise criteria of the Acoustic Impact Assessment and Mitigation Report submitted under part a) of this condition</i> c) <i>Submit to EDQ certification from a suitably qualified and experienced person that the development complies with the noise criteria of the Acoustic Impact Assessment and Mitigation Report approved under part a) of this condition.</i>
Proposed Wording of Condition	a) Submit to EDQ an Acoustic Impact Assessment and Mitigation Report demonstrating that the design for all proposed accommodation units, affected by Road traffic noise achieve the relevant internal maximum design sound levels. The report is to be prepared and certified by a suitably qualified and experienced person and address: i. The Brisbane City Plan 2014, Noise Impact Assessment Planning Scheme Policy; and ii. Australian Standard AS2107 "Acoustics – Recommended Design Sound Levels and Reverberation Times for Building Interiors" using the methods set out in Australian Standard AS3671 "Acoustics – Road Traffic Noise Intrusion Building Siting and Construction" by b) a) Design and construct the development to achieve compliance with the noise criteria of the approved Acoustic Impact Assessment and Mitigation Report submitted under part a) of this condition c) b) Submit to EDQ certification from a suitably qualified and experienced person that the development complies with the noise criteria of the Acoustic Impact Assessment and Mitigation Report approved under part a) of this condition.

Condition 5 - Busway Acoustic Mitigation Requirements	
Current Condition to be deleted	<i>Where there is direct line of sight from the busway to the private open space, install continuous noise-reducing balustrades, with no gaps other than gaps required for drainage purposes, in accordance with the Building Code of Australia on each of the private balconies on levels 1–5. Note: Balustrades may be constructed of appropriately rated glass.</i>
Condition to be deleted – Refer to attached Acoustic assessment to be included in revised condition package.	

6. SUMMARY

This application is made in respect of Change to a PDA Development Approval pursuant to Section 99(2) of the ED Act. As required, this letter has demonstrated that the proposed changes do not result in a “substantially different” development. In all circumstances, we consider this development to comply with the change criteria and as such deserves MEDQ’s favourable consideration.

Attached to this letter is the applicable Form, signed owners’ consent and supporting appendices. Should you require anything further to assist in the assessment of this application, please do not hesitate to contact the undersigned office on (07) 3666 0887 or via email at tam@tdplanning.com.au.

Yours faithfully,



TAM DANG PLANNING PTY LTD

Enc: DA Form 5
Signed Owners Consent
Appendix A – Proposed Revised Plans
Appendix B – Updated SBSMP
Appendix C – Acoustic Report