Our ref: 12561
Council ref: 7193/2017/MAPDA/A

Saunders Havill
PATHWAYS TO SUCCESS

Saunders Havill Group Pty Ltd
ABN 24 144 972 949

30 September 2026

Economic Development Queensland (EDQ)
GPO Box 2202
Brisbane QLD 4001

Via: EDQ Lodgement Portal

Dear Sir / Madam,

RE: **REQUEST FOR CHANGE TO PDA DEVELOPMENT APPROVAL (7193/2017/MAPDA/A) FOR RECONFIGURATION OF LOT (1 LOT INTO 339 RESIDENTIAL LOTS, THREE (3) DETENTION LOTS AND ONE (1) LOCAL NEIGHBOURHOOD RECREATION PARK LOT) AND MATERIAL CHANGE OF USE (ENDORSEMENT OF A PLAN OF DEVELOPMENT) - 7-101 BAYLISS ROAD, SOUTH RIPLEY QUEENSLAND 4306**

We act on behalf of KDL Dev 3 Pty Ltd, the Applicant, in relation to this request to change a development approval pursuant to section 99 of the *Economic Development Act 2012* (ED Act). We have carried out an assessment of the proposed changes outlined herein and believe they would not result in the development being substantially different in accordance with section 99 of the ED Act.

The amendment application seeks approval for:

- revised staging boundaries, while retaining the approved development footprint, road network and residential yield;
- corresponding updates to the approved proposal, staging and Plan of Development drawings;
- endorsement of updated landscape, civil, stormwater and vegetation-clearing documentation;
- deletion of Conditions 13, 22 and 24;
- amendment of Condition 25(a) to remove the separate compliance assessment requirement; and
- consequential amendments to the remaining conditions, timing provisions and cross-references to align with EDQ's current Certifications Procedures Manual Framework and standard conditioning.

This letter includes the following sections:

- Background;

- Proposed Changes;
- Amendments to Approval;
- Legislative Assessment; and
- Summary.

In support of our change application, the following documentation has been provided as attachments:

Attachment A	Amended Plans (Proposal, Staging, Plan of Development)
Attachment B	Amended Civil Engineering Plans
Attachment C	Amended Landscape Concept Plans
Attachment D	Amended Vegetation Clearing and Fauna Management Plan
Attachment E	Amended Stormwater Management Plan
Attachment F	Copy of Existing Development Approval

1. Background

The subject site is included within the Ripley Secondary Urban Centre East (SUCE) Context Plan area, which was endorsed on 30 May 2013 by the Minister for Economic Development Queensland (MEDQ) and seeks to set out a high-level planning framework and land use map for the SUCE. The SUCE Context Plan has undergone several amendments since its original endorsement, however, broadly remains the same in respect of the subject site.

Prior to the current applicant acquiring the subject site, the approval was originally approved on 20 October 2023 (Council Ref: 7193/2017/PDA) for 257 residential lots, three drainage reserve lots and one Local Neighbourhood Recreation Park, and Material Change of Use for Endorsement of a Plan of Development. The development application plans were initially lodged on 28 September 2017. Following a lengthy assessment process, the application was eventually approved on 20 October 2023.

The applicant then acquired the site and subsequently lodged a PDA Change application on 22 August 2025 seeking several changes, including but not limited to the addition of eighty-seven (87) lots and a substantively revised street configuration. The changes were subsequently approved on 12 June 2026 (Council Ref: 7193/2017/MAPDA/A).

2. Proposed Changes

2.1.1 Staging

Following receipt of the latest approval, the applicant has commenced detailed design of the development. Through this process, several opportunities have been identified to improve the efficiency and practical delivery of the development through revisions to the approved staging boundaries. Importantly, the overall staging framework remains unchanged, with the development intended to still be delivered over 10 stages albeit in a different configuration.

The revised staging arrangement provides a more logical progression of development, reduces the extent of upfront works required to facilitate the initial stages, and improves certainty regarding the timely delivery of development outcomes. The proposed amendments are limited to adjustments to the boundaries between approved stages and do not alter the approved development footprint, built form outcome, road network or residential yield. A comparison of the approved and proposed staging boundaries is provided in the figures below.

Furthermore, several of the technical reports and plans endorsed under the existing approval also require minor updates to reflect the amended staging extents. The relevant amended technical reporting is included with this application and has been updated, where necessary, to capture the revised staging arrangement and any associated minor adjustments (refer to **Section 2.1.3** below). Notably, there are no changes proposed to the residential lots or road network.



Figure 1: Approved Staging Plans



Figure 2: Proposed Staging Plans

2.1.2 Conditions

As part of the detailed design process, the applicant has undertaken a comprehensive review of the existing conditions of approval to ensure they remain appropriate having regard to the approved development, the current design outcomes, and the development assessment framework now applying within the Ripley PDA.

Through this review, several conditions were identified that either duplicate matters addressed through other approval requirements, seek to regulate activities that would not ordinarily require separate assessment, or are no longer considered necessary to achieve the intended planning outcomes of the approval. These include:

- Condition 13 (Compliance Assessment);
- Condition 22 (Vegetation Retention);
- Condition 24 (Vegetation Clearing and Fauna Management Plan); and
- Condition 25(a) (Emergency Access compliance assessment requirement).

In particular, the applicant considers that the vegetation retention requirements applying within the proposed park area unnecessarily constrain the delivery of a functional and appropriately designed public open space outcome. While the retention of existing vegetation has been carefully considered through the detailed design process, strict adherence to the approved vegetation retention requirements would result in a compromised park layout for the benefit of retaining a limited number of trees. The applicant considers that the revised open space outcome represents a more appropriate balance between vegetation outcomes and the provision of high quality, usable public recreation space that can accommodate:

- a functional kickabout area at the specified grade, unconstrained by existing vegetation; and
- a multipurpose half-court, which cannot be accommodated under the existing design due to the combined grading and vegetation-retention constraints.

Accordingly, amendments are sought to remove or modify the above conditions where they are no longer necessary or reasonably related to the development as proposed. Further detail regarding the specific conditions subject to amendment is provided in **Section 3.0** of this letter.

In addition, consequential amendments are sought to update terminology, correct cross-references and align the affected conditions with EDQ's current pre-construction certification framework, while maintaining the underlying intent of the remaining approval requirements.

2.1.3 Reporting

As outlined above, we have prepared additional reporting to support this amendment application. The primary change involves the revised staging boundaries, for which updated Landscape Concept Plan (**Attachment C**), Civil Engineering documentation (**Attachment B**), Vegetation Clearing and Fauna Management Plan (**Attachment D**) and amended Stormwater Management Plan (**Attachment E**) have been prepared to support the application and address the proposed changes.

3. Amendments to Approval

3.1.1 Approved Plans Specifications and Drawings

To facilitate the proposal, the applicant requests that the approved plans be amended (or added, as necessary) to reflect the proposed changes in accordance with the below table.

Approved Plans			
Reference No.	**Description & Revision No.**	**Prepared By**	**Date**
Aspect of development: Reconfiguring a lot			
12561-P-07-CON 01~~, Rev N~~	~~ROL 1:~~ Proposal Plan	Saunders Havill	~~16 March 2026~~ 1 September 2026
12561-P-07-PRO 01~~, Rev N~~	~~Proposal Plan~~ Staging Plan	Saunders Havill	~~16 March 2026~~ 1 September 2026
12561 P 07 Rev P - STG 01	Staging Plan – Stage 1	Saunders Havill	1 September 2026
12561 P 07 Rev P - STG 02	Staging Plan – Stage 2 & 3	Saunders Havill	1 September 2026
12561 P 07 Rev P - STG 03	Staging Plan – Stage 4 & 5	Saunders Havill	1 September 2026
12561 P 07 Rev P - STG 04	Staging Plan – Stage 6 & 7	Saunders Havill	1 September 2026
12561 P 07 Rev P - STG 06	Staging Plan – Stage 8, 9 & 10	Saunders Havill	1 September 2026
Aspect of development: Material Change of Use			
~~12561 P 07~~ 12561 P 07 Rev P - POD 01	Plan of Development – Stage 1	Saunders Havill	1 September 2026
~~12561 P 07~~ 12561 P 07 Rev P - POD 02	Plan of Development – Stage 2 & 3	Saunders Havill	1 September 2026
~~12561 P 07~~	~~Plan of Development – Stage 3~~	~~Saunders Havill~~	~~16 March 2026~~
~~12561 P 07~~ 12561 P 07 Rev P - POD 03	Plan of Development – Stage 4	Saunders Havill	1 September 2026
~~12561 P 07~~ 12561 P 07 Rev P - POD 04	Plan of Development – Stage 5	Saunders Havill	1 September 2026
~~12561 P 07~~	Plan of Development – Stage 6~~ & 7~~	Saunders Havill	1 September 2026

12561 P 07 Rev P - POD 05			
~~12561 P 07~~ 12561 P 07 Rev P - POD 06	Plan of Development – Stage ~~8~~ 7	Saunders Havill	1 September 2026
~~12561 P 07~~ 12561 P 07 Rev P - POD 07	Plan of Development – Stage 8 & 9	Saunders Havill	1 September 2026
~~12561 P 07~~ 12561 P 07 Rev P - POD 08	Plan of Development – Stage 10	Saunders Havill	1 September 2026
Specifications/Drawings			
Reference Number	**Description & Revision No.**	**Prepared By**	**Date**
Aspect of Development: Reconfiguring a Lot			
12561 Issue F	Bayliss Road South Ripley – Landscape Concept Design	Saunders Havill	September 2026
~~1511-013/ SK010/ K~~	~~Parkland Detail~~	~~LAUDink~~	~~14 April 2023~~
93434.00.R.001.Rev1.Final	Dispersive Soils Management Plan (DSMP) – Proposed Residential Subdivision – 7 – 101 Bayliss Road, Ripley – Revision 1	Douglas Partners	27 June 2018
93434.01.R.002.Rev0	Report on Geotechnical Investigation – Proposed Residential Development – 7-101 Bayliss Road Ripley' – Revision 0	Douglas Partners	8 March 2019
93434.01.R001.Rev0.RP/ARM	Slope Stability Report	Douglas Partners	26 February 2019
2024-176-VCFMP	Vegetation Clearing and Fauna Management Plan	28 South Environmental	~~13 March~~ 2 September 2026
	Bushfire Management Plan (BMP)	Queensland Bushfire Planning	October 2025
GA0002	Site-Based Stormwater	Arcadis	~~17 March 2023~~ 15 September 2026

	Quality Management Plan Rev ~~34~~		
B25230TL001_REVA	Traffic Engineering Response to Council Information Request	L+R	27 November 2025
B25230TR001_REVA	Proposed Residential Development 1 - 101 Bayliss Road South Ripley 4306 Traffic Impact Assessment	L+R	14 August 2025
25BRA0249 R01_2	Road Traffic Noise Assessment Rev: 2	Colliers	28 November 2025
12561-P-09-CON 01, Rev N	Road Hierarchy Plan	Saunders Havill	10 March 2026
12561, Rev D	Connectivity Plan	Saunders Havill	March 2026
BSR-AAU-DA-WS00-DRG-CV-0101, Rev ~~03~~ 04	Bulk Earthworks Layout Plan Sheet 1	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0101, ~~03~~ 04	Bulk Earthworks Layout Plan Sheet 2	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0121, Rev 03	Earthwork Sections Sheet 1	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0122, Rev ~~03~~ 04	Earthwork Sections Sheet 2	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0123, Rev ~~02~~ 03	Earthwork Sections Sheet 3	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0124, Rev ~~02~~ 03	Earthwork Sections Sheet 4	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0201, Rev ~~03~~ 04	Combined Services Layout Plan Sheet 1	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0202, Rev ~~03~~ 04	Combined Services Layout Plan Sheet 2	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0251, Rev ~~03~~ 04	Road Longitudinal Sections Sheet 1	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0252, Rev ~~03~~ 04	Road Longitudinal Sections Sheet 2	Arcadis	~~16 March 2026~~ 14 September 2026

BSR-AAU-DA-WS00-DRG-CV-0253, Rev ~~03~~ 04	Road Longitudinal Sections Sheet 3	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-S00-DRG-V0254, Rev ~~03~~ 04	Road Longitudinal Sections Sheet 4	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-S00-DRG-CV-0255, Rev ~~03~~ 04	Road Longitudinal Sections Sheet 5	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0256, Rev ~~03~~ 04	Road Longitudinal Sections Sheet 6	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0257, Rev ~~03~~ 04	Road Longitudinal Sections Sheet 7	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0258, Rev ~~02~~ 03	Road Longitudinal Sections Sheet 8	Arcadis	~~16 March 2026~~ 14 September 2026
BSR-AAU-DA-WS00-DRG-CV-0259,Rev ~~01~~ 02	Road Longitudinal Sections Sheet 9	Arcadis	~~16 March 2026~~ 14 September 2026

3.1.2 Condition Changes

As described in **Section 2.0** of this letter, it is sought for the conditions to be amended (where applicable) to align with EDQ's standard condition format.

In addition to these changes and to facilitate the proposed changes, we request the below conditions are amended/deleted as indicated:

Condition 10 – Park Naming

Condition	Timing
The applicant must submit to the MEDQ Delegate a list of three (3) proposed park names and the corresponding name meanings for any new park. The MEDQ Delegate reserves the right to accept any or none of the proposed names.	*In conjunction with the lodgement of the ~~compliance assessment~~ pre-construction certification application that creates the related park.*

Comment: The proposed amendment removes the remaining compliance assessment requirements from the approval. As the condition governing delivery of the Local



Neighbourhood Recreation Park does not require compliance assessment, the timing of Condition 10 should instead refer to the relevant pre-construction certification application.

Condition 13 – Compliance Assessment

Condition	Timing
~~a) Where a condition of this approval requires compliance assessment, compliance assessment is required in accordance with the timing set out in the conditions.~~	~~As required by relevant conditions of this approval.~~
~~b) Before compliance assessment will commence, payment for any applicable fees must accompany any request for compliance assessment. The fee is set out in the Economic Development Queensland's (or equivalent statutory assessing authority) Development Assessment Fees and Charges in force at the date of lodgement.~~	~~As required by relevant conditions of this approval.~~
~~c) The process and timeframes that apply to compliance assessment are:~~ ~~(i) The applicant submits plans and supporting information as required for compliance assessment;~~ ~~(ii) Within 20 business days – the MEDQ Delegate assesses the plans and supporting information and if not satisfied with the information as submitted – notifies the applicant accordingly.~~	~~As required by relevant conditions of this approval.~~
~~d) If the applicant is notified under Condition 13(c)(ii) above:~~ ~~(i) The information and plans addressing the concerns are to be re-submitted;~~ ~~(ii) Within a further 15 business days – the MEDQ Delegate assesses the re-submitted plans and supporting information and if not satisfied with the information as submitted – notifies the applicant accordingly.~~ ~~If the applicant is notified at Condition 13(d)(ii) above, within 10 business days, the MEDQ Delegate and applicant will repeat steps at Condition 13(d)(i). At any time and upon~~	~~As required by relevant conditions of this approval.~~

~~*utilizing Condition 13(c) at least once, if either party is not satisfied by the outcome of this process, that party can elect to enter into a mediation process with an independent mediator agreed to by both parties or if there is no agreement, nominated by the President for the time being of the Queensland Law Society Inc.*~~

Comment: The Applicant proposes to delete remaining requirements for Compliance Assessment within the approval, therefore this condition would be redundant. Consequential amendments are also sought to remove or replace any remaining references to Condition 13 within the approval.

Condition 22 – Vegetation Retention

Condition	Timing
~~*a) The applicant must submit to the MEDQ Delegate for compliance assessment approval a Vegetation Assessment Plan (VAP) undertaken by an AQF 5+ arboricultural professional that is generally in accordance with section 1.6(A) of the Ipswich Planning Scheme Policy 2 – Information Local Government May Request. The VAP must comply with all other conditions of this approval and must include, but is not limited to, the following items:*~~ ~~*(i) On an appropriately scaled plan identify all trees within 10 metres either side of any proposed earthworks interface where vegetation is to be retained i.e. constructed waterway corridor and open space ;*~~ ~~*(ii) The information submitted must include tree species, diameter at breast height (dbh), habitat, health and individual Structural and Tree Protection Zones (TPZ);*~~ ~~*(iii) Undertake a Tree Impact Assessment and Mitigation strategy that outlines minor changes to earthworks that will maximise the retention of trees in areas to be dedicated to the MEDQ Delegate;*~~	~~*Prior to the issue of pre-construction certification for the first stage of the development.*~~

	~~(iv) Demonstrate the retention of native vegetation through micro-siting, amended site design and earthworks strategies ensuring impacts to trees are assessed in accordance with AS4970-2009 Protection of trees on development sites;~~ ~~(v) In relation to the future Open Space areas, assess the trees and identify those suitable for retention and any works required to ensure they will not pose a risk to health and safety which should inform the park design required by Condition 16 – Local Neighbourhood Recreation Park; and~~ ~~(vi) Clearly identify areas/ trees that require tree protection fencing and the type of fencing required to ensure trees are not impacted during construction works.~~	
~~b)~~	~~The applicant must nominate a project supervising arborist (minimum AQF 5).~~	~~Prior to clearing works commencing on the site.~~
~~c)~~	~~Unless otherwise approved in writing by the MEDQ Delegate, the applicant must retain trees identified in the report required by Condition 2322(a) above within areas of neighbourhood park and waterway corridor. These must be appropriately protected from impact of any construction works as prescribed by the nominated AQF 5+ supervising arborist required by (b), and in accordance with AS4970:2009 Protection of Trees on Development sites.~~	~~Prior to clearing works commencing on site and maintained until the civil works are accepted off maintenance.~~
~~d)~~	~~The applicant must submit to the MEDQ Delegate a report, prepared by the nominated project arborist (AQF 5+) required by (b), outlining:~~ ~~(i) The extent of arboricultural treatment undertaken on trees to be protected and retained as detailed within this approval. The nominated project arborist must ensure all appropriate arboricultural measures to ensure the survival and long-term health of the protected trees including but not limited to soil decompaction, soil aeration, fertilising, mulching, watering, root or crown reduction and hazard~~	~~Prior to the acceptance of the works on maintenance.~~

~~*reduction pruning or as otherwise determined by the arborist;*~~

~~*(ii) Confirmation that all trees to be retained have been reinspected during and following completion of the works; and*~~

~~*(iii) Any further necessary works required prior to dedication and acceptance of the land on which the trees are located off maintenance.*~~

~~*e) The applicant must submit to the MEDQ Delegate a report, prepared by the nominated project arborist (AQF 5+) required by (b), outlining:*~~ ~~*(i) The extent of arboricultural treatment undertaken on trees to be protected and retained as detailed within this approval; and*~~ ~~*(ii) Confirmation that all trees to be retained have been reinspected and any arboricultural works required noted in (d)(iii) have been undertaken and no further mitigation is required.*~~	~~*Prior to the acceptance of the works off-maintenance.*~~

Comment: During assessment of the original application, Council was of the view that the park design needed to accommodate retention of vegetation. Subsequently, Council conditioned that vegetation retention within the park be subject to a future Compliance Assessment application. The VCFMP submitted with the original application indicated that 18 trees could be retained and a further 9 could potentially be retained subject to arborist assessment. These trees were scattered through the park, where earthworks were limited. However, they constrain the park due to the existing grade and inability to undertake any earthworks within the tree protection area. These constraints resulted in a functionally limited kickabout area and prevented the provision of a half-court due to the existing grades.

An amended VCFMP is now submitted, which shows no retained vegetation within the park area. This will allow for delivery of a functional and appropriately designed public open space outcome without the need to design around existing vegetation constraints, while also removing the need for a separate Vegetation Assessment Plan and associated compliance assessment process. A functional and compliant kickabout area can be provided at the



specified minimum 1:33 grade and a half-court can be provided. Replacement vegetation in the form of shade trees will be provided within the park area. Refer to the attached amended Landscape Concept Plan (**Attachment C**) and VCFMP (**Attachment D**).

Condition 24 – Vegetation Clearing and Fauna Management Plan

Condition	Timing
~~*a) The applicant must submit to the MEDQ Delegate a Vegetation Clearing and Fauna Management Plan (VCFMP) prepared by a suitably qualified spotter catcher or ecological professional. The VCFMP should provide the following details for the vegetation clearing associated with this approval:*~~ ~~*Vegetation Clearing*~~ ~~*(i) Staging of vegetation clearance to minimise exposed areas in line with current IECA Best Practice in Erosion and Sediment Control Manual;*~~ ~~*(ii) Roles and responsibilities for site contractors, the developer and the consultant group;*~~ ~~*(iii) The storage/ stock piling and reuse of cleared native vegetation e.g. logs riparian corridor or in the drainage lot, open space; and*~~ ~~*(iv) A list of relevant State and Commonwealth legislation clearing controls for the identified flora.*~~ ~~*Fauna management*~~ ~~*(v) A summary of species and habitat surveyed as being present on the site which are likely to be impacted by the works;*~~ ~~*(vi) A list of relevant State and Commonwealth legislation constraints or controls for the identified fauna;*~~	~~*In conjunction with the issue of pre-construction certification for the first stage of the development.*~~

~~*(vii) A plan showing existing habitat opportunities and locations;*~~

~~*(vii) Method of preserving valuable habitat features such as large fallen logs, log piles, rock piles or outcrops wherever practicable through the translocation and re-establishment in coordination with the nominated spotter catcher;*~~

~~*(viii) A clearing sequence plan and direction of clearing;*~~

~~*(ix) Based on the expected fauna provide information on the method of clearing, including: special considerations for management/ mitigation, timing of clearing appropriateness for species, temporary methods required e.g. barrier fencing to direct fleeing fauna;*~~

~~*(x) Summary of removal and relocation methods for each faunal group;*~~

~~*(xi) Identification of special equipment that will be required e.g. Thermal Imaging, snake eye camera, cherry picker, chainsaw etc;*~~

~~*(xii) Identification of general release locations if required based on habitat requirements; and*~~

~~*(xiii) Methods to euthanise injured animals as well as contact details and location of the closest appropriate wildlife carer.*~~

Comment: As noted above, a revised VCFMP is included within this change application submission. Previously, there were two VCFMPs associated with the development – one that was submitted/approved with the development application, showing retention/removal of trees within the public park area; and another showing clearing of the balance of the site that was prepared subsequent to the development application approval. It is requested that EDQ assess and approve the amended VCFMP as part of this change application and then remove the requirement for this to be submitted for assessment.

Condition 25 – Emergency Access

Condition	Timing
a) *The applicant must submit to the MEDQ Delegate ~~for compliance assessment~~, the detailed engineering design and construction drawings certified by an RPEQ experienced in road and intersection design for the emergency access. Unless otherwise approved in writing by the MEDQ Delegate this design must ensure the provision of an all-vehicles and all-weather emergency access that meets the Gravel Rural Road standard included on Ipswich City Council's Standard Drawing SR09.*	*Prior to the issue of preconstruction certification for the first stage of the development.*

Comment: The Applicant requests that the requirement for compliance assessment of the emergency access be deleted from the approval, in order that the condition be amended such that the Applicant only needs to submit the design of the emergency access prior to pre-construction certification.

4. Legislative Assessment

We have assessed the changes against the Ripley Valley Development Scheme and relevant EDQ Guidelines and Practice Notes and the changes are generally consistent with the requirements of these documents, and generally consistent with the requirements of the existing approval.

Section 99 of the ED Act states that an amendment application may only be made if the MEDQ is satisfied the change *would not result in the relevant development being substantially different*. Substantially different is not defined in the ED Act, however there is a 'substantially different development' guideline contained in the Development Assessment Rules (DA Rules) that provides some guidance.

The below table provides an assessment of the proposed changes against the 'substantially different' criteria from the DA Rules.

Substantially different development:	Response
(a) Involves a new use; or	The change application does not involve a new use.
(b) Results in the application applying to a new parcel of land; or	There are no additional parcels of land included in this application.

Substantially different development:	Response
(c) Dramatically changes the built form in terms of scale, bulk and appearance; or	This application does not propose any changes to the built form in terms of scale, bulk or appearance.
(d) Changes the ability of the proposed development to operate as intended; or	The proposal does not change the ability of the proposed development to operate as a master planned residential subdivision.
(e) Removes a component that is integral to the operation of the development; or	No integral operational components will be removed as part of this application. The amendment changes the extent of vegetation removal within the approved development footprint. However, it does not introduce clearing beyond the approved site, alter the approved land-use pattern or reduce the area of the neighbourhood recreation park. The revised VCFMP and landscape design provide the management and replacement-planting measures applicable to the amended outcome.
(f) Significantly impacts on traffic flow and the transport network, such as increasing traffic to the site; or	The proposed change does not propose any changes that would significantly impact on traffic flow or transport network.
(g) Introduces new impacts or increases the severity of known impacts; or	The amendment does not introduce a new category of impact or materially increase the severity of the impacts associated with the approved development. The changed vegetation-clearing outcome remains within the approved development footprint and is addressed through the amended VCFMP, landscape design and replacement shade-tree planting. The effects of the revised staging are addressed through the supporting civil and stormwater documentation.
(h) For a development prescribed by the Planning Regulation as requiring social impact assessment as identified under section 106T of the Act –	This development is not prescribed by the Planning Regulation as requiring social impact assessment as identified under section 106T of the Act.

Substantially different development:	Response
▪ *Introduces new social impacts or increase the severity of known social impacts; or*	
(i) Removes an incentive or offset component that would have balanced a negative impact of the development; or	No offset components are removed as part of this change application.
(j) Impacts on infrastructure provisions.	No Infrastructure provisions are impacted by the proposed change. The amendment does not alter the ultimate infrastructure required to service the approved development. While the revised staging changes the timing and sequence of some infrastructure delivery, the supporting civil and stormwater documentation demonstrates that each stage can be appropriately serviced and delivered sequentially in accordance with the approval requirements.

5. Summary

In summary, it is considered that the proposed amendment would not result in the approved development being substantially different and has been appropriately described and assessed as part of this amendment application. Accordingly, we respectfully request that EDQ approve the amendments sought within this letter and update the PDA development approval to incorporate the attached plans and supporting documentation.

Upon receipt of EDQ's assessment fee, we will coordinate payment at earliest opportunity.

Should you wish to discuss the above matters further, please do not hesitate to contact me on (07) 3539 6703 or email at nickchristofis@saundershavill.com.

Yours sincerely
Saunders Havill



Nick Christofis
Regional Manager, Springfield