

7 May 2026

Chief Executive Officer
Brisbane City Council
C/- Chris Dixon, Senior Urban Planner
Planning Services

GPC Job Reference: 25.2455

Dear Chris,

RE: FURTHER SUPPORTING INFORMATION (COUNCIL REFERENCE: A006935512)

MINOR CHANGE – WINDSOR HEALTH QUARTER

182 LUTWYCHE ROAD AND 105-109 VICTORIA STREET, WINDSOR

1. INTRODUCTION

We refer to Council's correspondence dated 27 March 2026 requesting further information in relation to the proposed minor change application for Windsor Health Quarter at 182 Lutwyche Road and 105-109 Victoria Street, Windsor QLD 4030 (Council reference: A006935512).

This correspondence provides the Applicant's full response to the matters raised by Council and should be read in conjunction with the following supporting material:

- **Attachment A:** Amended Traffic Assessment prepared by PTT
- **Attachment B:** Revised Architectural Plans prepared by Elevation Architecture
- **Attachment C:** Landscape Concept Plans prepared by Andrew Gold Landscape Architect

The amended proposal has been revised in direct response to Council's comments and demonstrates that the proposed changes remain consistent with the approved development and continue to achieve compliance with the relevant assessment benchmarks of the Brisbane City Plan 2014. In particular, the amendments refine the proposed built form, access, servicing, landscaping and residential interface outcomes.

Additional technical material has also been provided to support the revised proposal, including updated plans, traffic and servicing analysis, and further planning justification addressing the specific matters raised by Council. On this basis, it is submitted that the proposed minor change is appropriately supported and warrants approval, subject to reasonable and relevant conditions.

A response to each information request item is provided below.

2. RESPONSE TO ASSESSMENT MANAGER'S REQUEST FOR FURTHER INFORMATION

2.1 Item 1: Traffic (Emergency Staff Access from Lutwyche Road)

Council's Request

- *No updated traffic information has been provided to support the proposed staff access from Lutwyche Rd.*
- *The application is required to be supported by a RPEQ certified traffic report. The report must clearly identify the changes from the most recent approval and demonstrate compliance with the planning scheme requirements for access, parking and servicing or provide justification for any proposed performance outcomes for Council's consideration.*
- *Council requires sufficient detail and justification, including (but not limited to) the proposed access arrangements (including the new ramp, emergency staff access, boom gate, amended carparking layout and number, traffic generation estimates, modelling and traffic counts, RPEQ certified swept path analysis. The RPEQ traffic report must demonstrate that the proposal provides safe and efficient access arrangements and no adverse impact and potential conflict to the on-site servicing, traffic flow and surrounding road networks and nearby intersection.*

Note: With 184 of the 195 parking spaces dedicated to the 5,302m² Health Hub, the proposal would generate concentrated volume of staff commuter trips at the Lutwyche Road frontage. This has the potential to transform what was previously a restricted-use (emergency-only) access into a frequent commuter entry point. This shift could represent a substantial intensification of traffic movements—occurring only 70m from a major signalised intersection.

Applicant's Response

An updated RPEQ-certified Traffic Assessment has been prepared by PTT in support of the revised proposal and is provided at **Attachment A**. The report has been prepared having regard to the amended access arrangements from Lutwyche Road, including the proposed ramp, boom gate, amended parking layout and servicing movements.

The updated assessment addresses the matters raised by Council and demonstrates that the revised access arrangement can operate safely and efficiently, without adverse impacts on the surrounding road network, nearby intersections, on-site servicing or internal traffic circulation. The report also includes updated traffic generation analysis, swept path assessment and consideration of the relationship between the proposed access and the nearby signalised intersection. Accordingly, the revised proposal is supported by sufficient technical analysis to demonstrate that the proposed access arrangements are acceptable from a traffic engineering perspective.

2.2 Item 2 – Built Form Change Fronting Victoria Street

Council's Request

- *Provide amended floor plans and elevations, accurately showing the outermost building line of the approval including the approved balconies, as the blue "approved" line shown on the plans does not accurately reflect the extent of the approved building line. The accurate information provided will assist with justifying the proposed changes.*
- *The amended proposal appears to show a larger floor plate to the sixth floor.*
 - *Provide amended plans ensuring the blue outline shown on the plans includes the approved plant room on the 6th floor*

- *As the 6th floor is a performance outcome for height and was approved on the basis that it is not easily seen or dominant from the street frontages, provide amended plans including diagrams and perspectives comparing the approved and proposed setbacks of the 6th floor to Victoria Street, demonstrating that the changes to the built form do not result in the 6th floor being more visible from Victoria Street compared to the approval.*
- *Where the proposed units within the 6th floor are proposed forward of the approved plant room, provide shadow diagrams comparing approved vs proposed and demonstrating no worsening shadowing impacts from the additional built form (if the proposed units are contained within the area that was previously approved as plant and do not extend closer to the Victoria Street frontage, no shadow diagrams are required).*

Applicant's Response

Revised architectural plans are provided at **Attachment B**. These plans have been updated to accurately identify the approved building envelope, including the full extent of approved balconies and the approved plant room at Level 6.

The revised documentation also includes comparative built form information to enable Council to properly assess the proposed changes relative to the current approval, particularly in relation to the Level 6 presentation to Victoria Street. In this regard, the amended plans demonstrate that the revised built form does not materially increase the visual prominence of the upper level when viewed from Victoria Street and does not result in any material worsening of amenity impacts.

To the extent relevant, the supporting plans and diagrams confirm that the proposed changes remain appropriately contained within the established development framework and do not give rise to a substantially different built form outcome.

2.3 Item 3 – Other Council Comments

Council's Request

- a) *While the built form changes to Lutwyche Rd is supported by Council, revised architectural drawings should clearly show ground floor tenancy glazing along the front boundary as transparent, non-reflective and remain free from film treatments or alike as to assist street activation.*
- b) *Access to proposed pathology tenancy to Lutwyche Rd is provided directly from the street, but the proposed finished floor level of the tenancy will require a step at entrance that may not accommodate DDA compliant access. Need DDA compliance access to the tenancies fronting Lutwyche Rd and further details on the existing verge levels fronting Lutwyche Rd.*
- c) *Lack of details around the pad mount transformer. Provide screening elements to the street frontage or/and additional landscaping buffering along the driveway edge to the pad mount transformer where possible, having consideration of sightline/ traffic requirements.*
- d) *Communal open space required for 10 or more units. Clarify and justify reasons of not providing Communal open space.*
- e) *Some POS do not achieve a minimum 3m x 3m dimension. Demonstrate on revised plans that the POS is functional.*
- f) *Previously approved soft landscaping along boundary of 103 Victoria St has been replaced with hard landscaping – it needs to be minimum of 2 tiers to achieve screening and visual softening.*
- g) *The 'Bin Collection Area' as per the current approval has not been demonstrated. The bin collection area must be reinstated so that the residential bins can be temporarily stored for servicing. The bin collection areas must be within 5m of the RCV.*

- h) *Demonstrate the bin collection areas do not impact the swept path of the RCV, the RCV standing position or servicing of the non-residential bins.*
- i) *The compaction ratio for the Portable compactor has not been denoted. It needs to state 'Compactor with 3:1 compaction ratio for general refuse only' for the portable compactor shown on ground floor bin room.*
- j) *Demonstrate the size of the bin rooms.*
- k) *Provide updated RPEQ swept path analysis demonstrate a RCV can safely and efficiently service the development and the swept path analysis.*
- l) *Height clearances over service vehicle access and manoeuvring areas to be demonstrated*
- m) *Bicycle parking numbers, layout, location and access for residents and visitors will need to comply with TAPS Code, TAPS policy and AS2890.3:2015.*
- n) *Most pollution conditions remain relevant including carpark exhaust and food and drink outlet. Investigate and confirm whether the SWMP with the MUSIC model file need to be revised to reflect the proposed changes.*

Applicant's Response

- (a) Revised architectural drawings at **Attachment B** clearly identify the ground floor tenancy glazing along the Lutwyche Road frontage as transparent and non-reflective. The glazing treatment has been refined to support an active frontage presentation and to ensure the shopfronts remain visually permeable to the street.
- (b) Revised architectural plans at **Attachment B** provide further detail regarding the interface between the Lutwyche Road verge and the ground floor tenancy entries. The final design and construction of compliant access arrangements to the tenancies will be addressed in detail at the building approval stage, including certification against the applicable accessibility requirements. The revised plans nevertheless demonstrate that an appropriate entry treatment can be achieved having regard to the frontage levels and tenancy design.
- (c) Revised plans at **Attachment B** include additional screening and landscape treatment to the pad mount transformer to improve its presentation to the street while maintaining the necessary sightline and operational requirements. These measures provide visual softening and improve the streetscape outcome at the driveway interface.
- (d) The proposed development includes 11 Specialist Disability Accommodation (SDA) dwellings and must be designed to respond to the operational, accessibility and amenity needs of future residents. In this context, the development does not adopt a conventional communal open space model typically associated with a standard residential flat building. Instead, the design response provides a series of high-quality private and semi-shared spaces tailored to the needs of SDA residents, together with convenient access to the surrounding public realm.

This approach is consistent with the Queensland Government's Social Housing Design Guideline Toolkit - Technical Summary Sheets, which recognises that for supported accommodation projects, the provision and design of communal outdoor space is to be considered on a project-specific basis having regard to the resident cohort and support model. In particular, the guideline emphasises the importance of functional, safe and accessible outdoor areas rather than a standardised or token communal space outcome. The proposed development responds to that intent in the following ways:

- each dwelling is provided with a private balcony/open space area, ensuring residents have direct access to usable and accessible outdoor space;

- the building includes shared internal lobby and circulation areas that facilitate passive interaction and resident interface in a safe, controlled and accessible setting;
- the ground level incorporates landscaped frontage treatments and a publicly accessible café / outdoor activation area, contributing to visual amenity, passive surveillance and an improved interface with the street;
- the site is well located in relation to a number of nearby public parks and recreation spaces, including Flynn Oval Park, Byrne's Paddock Park, Mann Park, Windsor Sports and Community Park, Northey Street Park, Victor Park and Downey Park; and
- for the intended SDA resident cohort, a large communal open space area is not necessarily the most appropriate or functional design response, with smaller, accessible and manageable spaces generally being more suitable to residents' mobility, supervision and support needs.

While the development exceeds the 10-dwelling threshold, the absence of a dedicated communal open space area is justified in this instance having regard to the specialised SDA housing typology and the alternative amenity measures incorporated into the design. The proposal continues to provide meaningful access to outdoor space, opportunities for resident interaction, landscaped outlook and convenient access to nearby public open space, without requiring the delivery of a nominal communal area that may be underutilised or of limited practical benefit to future residents.

Accordingly, the proposal is considered to satisfy the intent of the relevant performance outcome.

- (e) Revised plans at **Attachment B** now include dimensions and indicative furniture layouts for the private open space areas. This demonstrates that the balconies are capable of accommodating practical outdoor use and circulation, and are therefore functional notwithstanding that some areas do not achieve a strict 3m by 3m dimension
- (f) Revised landscape plans at **Attachment C** reinstate and strengthen the landscaping treatment along the boundary with 103 Victoria Street. The planting arrangement now provides a minimum two-tier landscape outcome to achieve screening, soften the built form and improve the residential interface.
- (g) Revised ground floor plans at **Attachment B** identify the residential bin collection area and demonstrate that it has been reinstated in accordance with the relevant refuse planning scheme policy requirements. The plans confirm that bins can be temporarily stored for collection within an appropriate distance of the refuse collection vehicle.
- (h) The updated traffic and servicing material at **Attachment A** includes swept path analysis demonstrating that refuse collection can occur safely and efficiently, and that the nominated bin collection areas do not compromise the standing position of the RCV, its manoeuvring path, or the servicing of the non-residential waste stream.
- (i) Revised plans at **Attachment B** now include notation confirming that the portable compactor is for general refuse only and operates at a 3:1 compaction ratio, consistent with Council's request.
- (j) Revised plans at **Attachment B** include dimensions for all bin rooms, demonstrating that adequate space is available for the proposed waste storage and servicing arrangement.
- (k) Refer to the updated Traffic Assessment at **Attachment A**, which includes revised RPEQ-certified swept path analysis demonstrating that an RCV can safely and efficiently access and service the development.
- (l) Revised plans at **Attachment B** identify the available height clearances over service vehicle access and manoeuvring areas and confirm that the required servicing movements can be accommodated.

- (m) The updated Traffic Assessment at **Attachment A** addresses bicycle parking provision, layout, location and access, and demonstrates compliance with the relevant requirements of the Transport, Access, Parking and Servicing Code, associated policy and AS 2890.3.
- (n) The proposed changes have been reviewed having regard to the existing approval conditions and stormwater management strategy. The stormwater management documentation, including the SWMP and MUSIC model remain consistent with the approval and no changes are required. The development has been appropriately conditioned to submit site drainage drawings for approval during the compliance phase.

3. SUMMARY

This correspondence has been prepared in accordance with section 13.2(a) of the DA Rules and provides a full response to the information requested by Council in relation to the proposed minor change application for Windsor Health Quarter over land located at 182 Lutwyche Road and 105-109 Victoria Street, Windsor QLD 4030 (Council reference: A006935512).

The enclosed material demonstrates that the amended proposal has been revised in direct response to Council's comments and that the proposed changes remain appropriate in the context of the approved development and the relevant provisions of the Brisbane City Plan 2014. The further information provided, including updated plans and technical reporting, confirms that the proposal can achieve appropriate outcomes in relation to built form, streetscape, access, servicing, landscaping and residential amenity.

Accordingly, the Applicant submits that the information request has been fully addressed and that the application is properly founded for determination.

If you have any questions, please do not hesitate to contact Simon Grice of Gaskell Planning Consultants on (07) 3392 1911.

Yours sincerely,



Simon Grice
Director