



20 May 2026

Tyrah Zarafa
Brisbane City Council
GPO Box 1434
Brisbane QLD 4001

Dear Tyrah,

Response to Further Advice – 12 Chalk Street, Wooloowin (Council Ref: A006835434)

Urbis Ltd continue to act on behalf of Cedar Woods ('the Applicant'), in relation to the abovementioned development application. This correspondence constitutes the Applicant's full response to the Further Advice issued by the Assessment Manager on 17 March 2026 for the development application, in accordance with Section 35.1 of the Development Assessment Rules (Council Reference: A006835434)

Each item from Council's information request letter has been outlined below (in italics) along with the respective comments and responses to each item. This response is supported by the following attachments:

- Attachment A – Updated proposal plans, prepared by Ellivo
- Attachment B – Updated waste management review, prepared by Ratio
- Attachment C – Updated traffic response, prepared by Urbis
- Attachment D – Community Management Plan
- Attachment E – Site suitability statement
- Attachment F – Updated landscape concept plan, prepared by Urbis

Item 1 – Staging

While it is acknowledged amended architectural plans providing further clarification on the proposed staging have been provided, further information is required to understand the intended staging breakdown of the development, functionality and compliance of the individual stages in isolation against the relevant assessment benchmarks of Brisbane City Plan 2014. Provide additional information detailing the proposed staging, including:

- A concise breakdown of all works to be delivered in each stage, including unit numbers, carparking infrastructure, external works and off-site improvements.*
- Breakdown of key development aspects, such as unit numbers, parking, site cover, deep planting etc per stage.*
- A full set of architectural plans that demonstrate the proposed staging lines, order and functionality between stages. The architectural plans are to include:*

- i. A clear staging line that does not intersect key aspects of the development which are required for the function of Stage 1 or results in the part-delivery of elements in Stage 2. NB: the current Architectural plans detail the staging line through carparks and balconies, which does not clearly illustrate how these spaces will be delivered.*
- i. An individual sets of plans for each of the stages proposed. The Stage 2 set should detail the earlier stage to demonstrate the interaction and removal of any temporary works.*
- ii. Detail of the interim treatment between stages. NB: It is noted that the amended plans did not clearly reflect all outcomes detailed within the written response.*
- iii. Demonstration of parking, access, servicing and manoeuvring arrangements whereby an interim solution is proposed between stages. NB: See 'Carparking and manoeuvring' section of this letter for further information regarding this component.*
- iv. Demonstration of how the stages will operate on their own during construction (e.g. any temporary walls proposed to basements until the construction of the next stage commences). They should also demonstrate what other stages will look like during construction (e.g. is excavation of the basement levels to occur at the same time as each other or will the Stage 2 remain as vacant land until the Stage 1 is completed).*
- d. Amended code assessment that reflect and justify the staging of this development in accordance with the relevant benchmarks of Brisbane City Plan 2014.*
- e. Amended specialist plans and reports that reflect and justify the staging of this development in accordance with the relevant benchmarks of Brisbane City Plan 2014.*

Response:

Please refer to updated plans in **Attachment A** which has revised staging lines and detail on inclusions for each stage. The new staging line includes the entire basement, podium and Building B within Stage 1 while Stage 2 is limited to the tower of Building A (refer **Figure 1**). This new staging arrangement ensures that all aspects of the development required for Stage 1 are delivered in Stage 1, and there are no "part-delivery" elements.

Figure 1 - New staging line



Table 1 provides a summary of works to be delivered and a breakdown of key development aspects in each stage.

Table 1 - Staging breakdown

Aspect	Stage 1	Stage 2
Summary of works	Stage 1 will involve the delivery of the basement, podium and the southern tower (Building B). This will include the delivery of all car parking, deep planting, communal space, and streetscape works associated with the development.	Stage 2 will involve the delivery of the northern tower (Building A).
Apartments	48 x 1-bedroom units 60 x 2-bedroom units 24 x 3-bedroom units TOTAL: 132 units	20 x 1-bedroom units 60 x 2-bedroom units 20 x 3-bedroom units TOTAL: 232 units (including Stage 1)
Car parking	251 x resident parks 35 x visitor parks	No additional car parking provided

Communal open space	262.61m ² – Ground level	25.09m ² – Level 2
	203.45m ² – Level 2	TOTAL: 1,097.5m ² (including Stage 1)
	606.35m ² – Rooftop terrace	
	TOTAL: 1,072.41m ²	

Deep planting

Site cover	26.85% (Building B)	26.52% (Building A)
		TOTAL TOWER SITE COVER: 53.37% (including Stage 1)

Having regard to the revised staging arrangement, an amended code assessment and specialist plans are not required. The updated staging ensures that all elements necessary to support the development and achieve compliance with the relevant benchmarks of Brisbane City Plan 2014 are delivered as part of Stage 1. This includes all infrastructure and facilities required to service the development, such as parking, essential services and communal open space, as well as all elements that provide a public or environmental benefit, including deep planting areas and the cross-block pedestrian link.

The proposed staging does not defer or diminish the delivery of outcomes relied upon to demonstrate compliance with the planning framework. Rather, it is intended solely to facilitate construction feasibility. Cedar Woods maintains a clear and ongoing commitment to delivering the development in its entirety, and the staging approach does not alter the overall form, function or planning outcomes of the proposal.

Item 2 – Building height

The comparative shadow diagrams provided in response to the Information request show additional overshadowing impacts from the proposal compared to a built form complying with the building envelope aspects of the assessment benchmarks. The response however does not provide detailed assessment of the impacts associated with the additional overshadowing and does not demonstrate how the proposal does not impact on the amenity of adjoining residents.

To allow for a full assessment of the shadowing impacts from the proposed developments height, provide further analysis of the additional overshadowing impacts to demonstrate the surrounding residences will continue to have access to adequate levels of natural light.

Response:

Please refer to the updated shadow diagrams in **Attachment A**, which now include hourly increments for the afternoon of 21 July, representing the worst-case scenario for overshadowing impacts. The diagrams compare the proposed development with an 8-storey development (refer **Figure 2**).

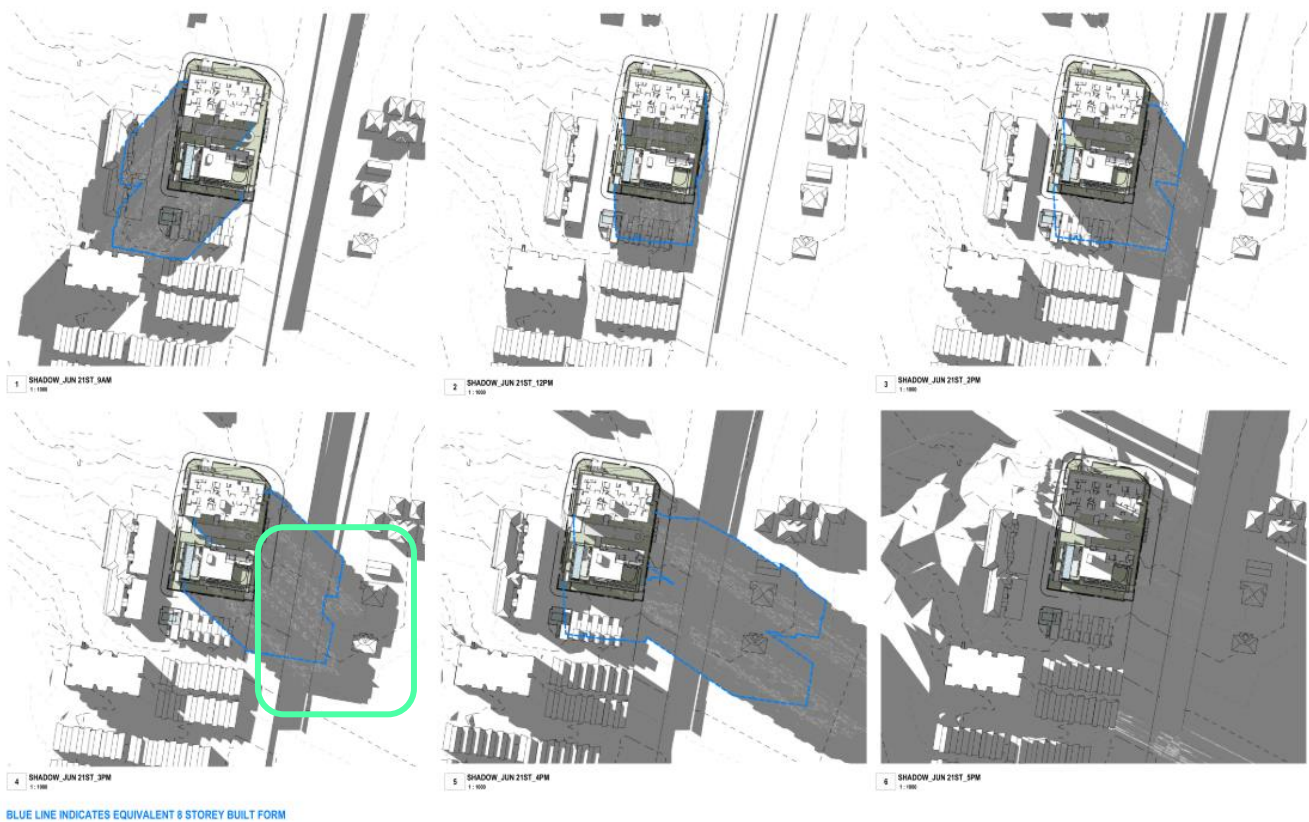
The analysis identifies additional overshadowing to two properties located to the east of the railway at 3pm on 21 July. Outside of this one-hour period, specifically prior to 3pm and after 4pm, the extent of overshadowing is consistent with that generated by a code-compliant built form. There is no increase in shadow impacts during the morning or around midday, when access to natural light is generally of greatest benefit to residential amenity.

The additional overshadowing occurs in the mid-to-late afternoon during mid-winter and does not result in a sustained or ongoing loss of sunlight to adjoining residences. The affected properties continue to receive

adequate levels of natural light throughout the day, including during earlier afternoon hours, and across the remainder of the year when higher solar angles reduce shadow impacts.

When considered in the context of an entire year, the additional overshadowing is limited to one hour on a single day and does not represent a material change to the overall solar access enjoyed by surrounding residences. On this basis, the proposal is not considered to result in an unreasonable impact on residential amenity or access to natural light, and the intent of the assessment benchmarks relating to building height and amenity is maintained.

Figure 2 – Updated Shadow Diagrams



Item 3 – Setback to Bridge Street

The additional planting proposed within the Bridge Street verge, which would need to be maintained by Council in perpetuity, does not adequately address the setback pattern, building transition and landscaping concerns raised in the Information Request. While it is acknowledged a consistent 3.5m wide setback along the full length of Bridge Street will be difficult to achieve without considerable design changes, in its current form the development has not demonstrated compliance with PO3, PO6, PO28, PO33 and PO34 of the Multiple dwelling code.

Provide amended architectural plans with an increased front setback to Bridge Street to provide appropriate landscaping outcomes and to be consistent with the streetscape and setback pattern intended for this area.

Response:

Following further consultation with Council, the architectural plans have been amended to introduce landscaped cut-outs along the Bridge Street frontage (refer to amended Ground Floor Plan and Bridge Street

Plan by integrating landscaping with built form to support shade, visual relief and a greener streetscape outcome.

- **PO33 and PO34 – Landscaping and amenity**

The landscaped cut-outs provide opportunities for substantial planting within the site boundary, enhancing on-site landscaping outcomes and avoiding reliance on verge planting. This contributes positively to pedestrian comfort and visual amenity along Bridge Street.

The revised frontage treatment improves pedestrian experience through increased greenery, façade articulation and visual interest at street level, while maintaining a functional and coherent building form outcome. When considered in the context of the broader Greville precinct – including the adjacent public park and the Northern Bikeway corridor – the proposal delivers an improved interface with the public realm and a high-quality streetscape outcome.

On this basis, the amended plans are considered to appropriately address the intent of PO3, PO6, PO28, PO33 and PO34.

Item 4 – Cross block link

For the heritage cross-block link to be considered as providing a community benefit, the entries and exits must remain open and accessible to the public 24 hours a day. Accordingly, the intercom/fob system proposed for after-hours access is not supported. Amend the proposed architectural plans to remove this notation and gate and provide further detail about how the cross-block link will operate and encourage community use.

Response:

The proposed heritage cross-block link is intended to provide a safe and legible pedestrian connection that is publicly accessible during typical daytime and evening hours. Public access is proposed between 7am and 10pm, reflecting reasonable and generous hours that align with established patterns of pedestrian activity and community use.

For resident safety and security, the link will be secured between 10pm and 7am via an intercom/fob system. This responds to the limited passive surveillance and minimal public use during overnight hours, as well as potential amenity impacts associated with late-night access through a residential building.

When open, the cross-block link will be clearly visible, well-lit and directly accessible from both street frontages, with appropriate wayfinding and passive surveillance to encourage community use.

While the link does not operate as a 24-hour publicly accessible space, it nevertheless provides a meaningful public benefit by improving pedestrian permeability, celebrating the site's heritage fabric and enhancing connectivity during the periods when it is most likely to be used. On this basis, the proposed access arrangements represent a balanced and appropriate response, and no amendment to remove the intercom/fob system is proposed.

Should Council determine that the proposed cross-block link does not provide a public benefit, the link can instead be designated for the exclusive use of future residents. In this scenario, the intercom/fob system would be retained at all times to ensure appropriate levels of safety and security.

Item 5 – Building Separation

To understand how the development manages potential overlooking impacts to the adjoining residents, provide a plan detailing the separation distances between the development and adjoining buildings with

specific identification of the separation distances between balconies and habitable rooms/openings on each property.

Response:

Please refer to **Attachment A** for the updated architectural plans, specifically drawing DA-402 which provides detail regarding the separation to the adjacent approved townhouses (Council Ref: A006183051).

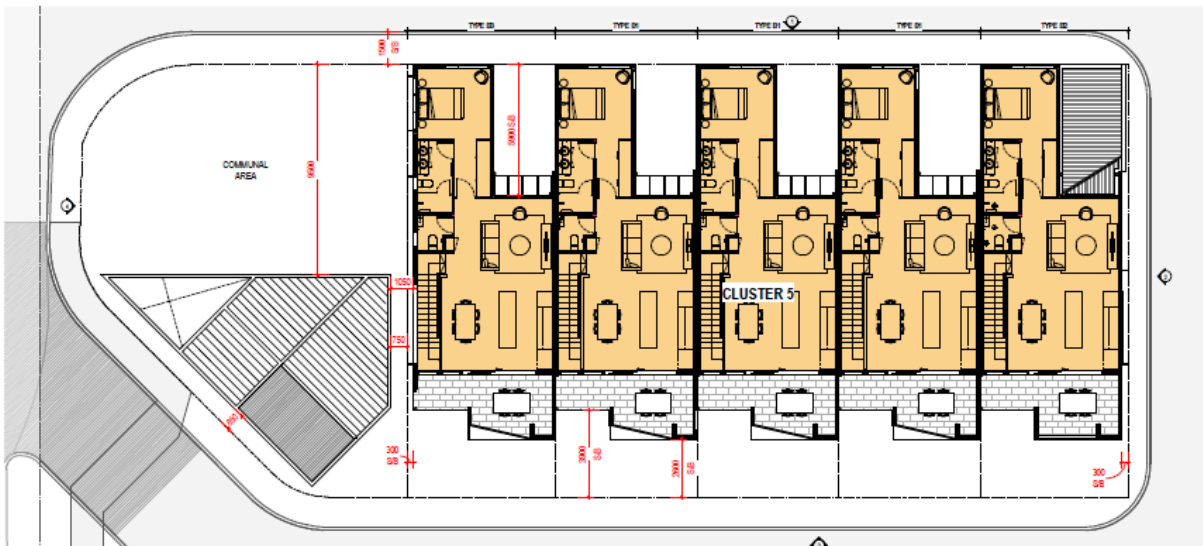
As illustrated in **Figure 2** below, the adjacent townhouses have a stepped configuration. The wall closest to the proposed development has a garage door on ground and a bedroom window on Level 1. The wall furthest from the proposed development has a bedroom window on ground and a living room window on Level 1.

The wall closest to the proposed development is separated 17.69m from the balcony line of the tower. The wall furthest from the proposed development is separated 22.06m from the balcony line of the tower. Pursuant to Table 9.3.14.3.F of the Multiple dwelling code, the building separation requirement for habitable rooms/balconies to habitable rooms/balconies is 3m on ground and 9m on Level 1. Accordingly, the proposed separation is compliant with the requirements of the Multiple dwelling code.

Further, given submitter concern, we have prepared a sight line drawing to ensure there are no material overlooking impacts. As illustrated in **Figure 3**, there is no clear sightline to the habitable windows of the townhouses from the balconies of the tower.

We trust this addresses Council’s concerns regarding building separation to adjoining buildings on site.

Figure 5 – Approved townhouses and proposed separation



STAGE 2&3 CLUSTER 5 DETAIL PLAN - LEVEL 1

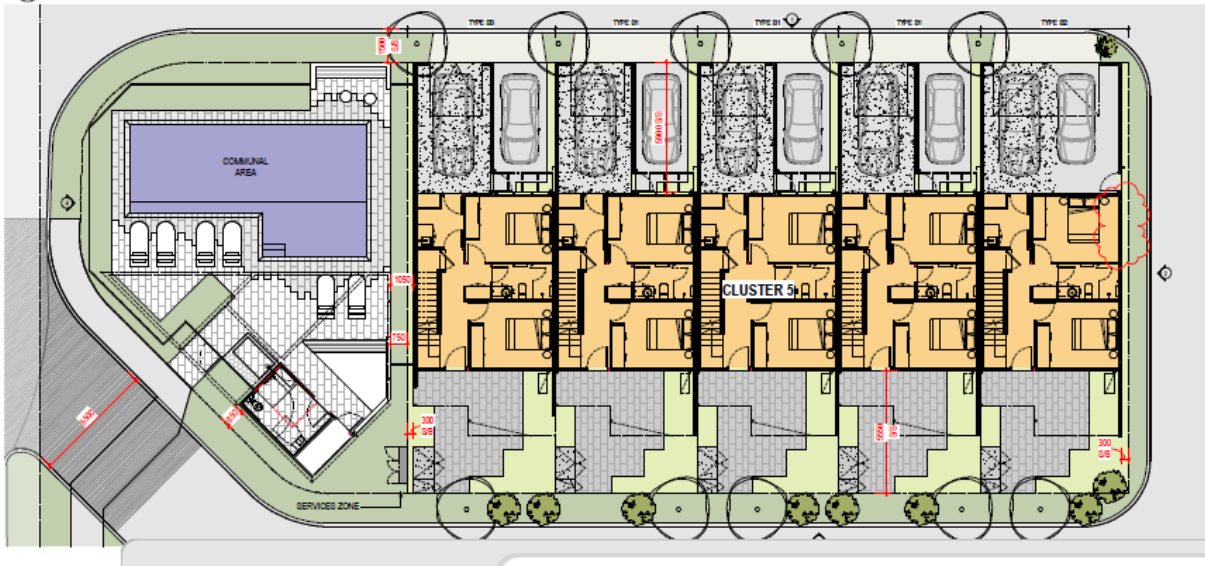
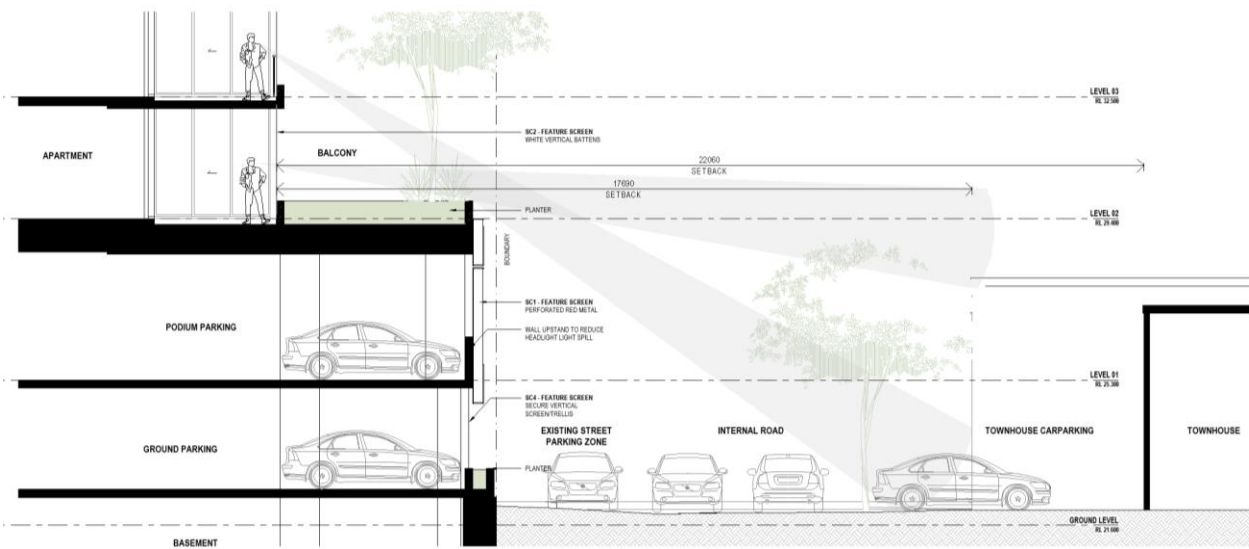


Figure 6 - Proposed separation between proposal and townhouses



Item 6 – Refuse

The submitted refuse collection response advised that the refuse collection vehicle (RCV) can partly stand within the driveway for servicing to achieve the 11.5m of clearance for servicing. As the internal road is a private road and not owned or managed by Council, compliance against PO19 and PO32 of the Transport, access, parking and servicing code has not been demonstrated. Provide amended plans, demonstrating:

- a. A functional 'Temp Bin Store' that is not blocked by the RCV.
- b. The area where the RCV stands to service the development is a minimum 11.5m long, 6.5m wide and has a minimum vertical clearance of 3.6m across the entire aisle.

NB: All bins must be able to be accessed individually; no bins are to be placed in the aisle while servicing other bins. It is noted that the room is of sufficient size, but access to both doors needs to be achieved.

Response:

Please refer to **Attachment B** for a detailed response to Council's request.

In summary:

- The updated ground floor plan provides a combined refuse storage and servicing area, ensuring the RCV does not block access to the temp bin store during servicing.
- The RCV standing area meets Council's requirements: minimum 11.5m long, 6.5m wide, and 3.6m vertical clearance, confirmed by a swept path assessment.
- Bins are arranged so each waste stream is accessible for its scheduled collection, with no bins placed in the aisle during servicing.
- The revised layout ensures the refuse storage and servicing area remains functional and accessible, addressing Council's requirements.

Item 7 – Access, carparking and manoeuvring

While the Traffic Letter submitted in response to the Information Request has addressed some of the traffic issues raised initially, further information is required to demonstrate the staged development's access, carparking and servicing arrangements are functional. Accordingly, provide a signed and certified Traffic Impact Assessment addressing the following:

- a. The proposed access to the site is obtained from the existing private road. To ensure right of access is maintained in the future, provide either:
 - i. Evidence of existing and continued rights to this internal road by the site and future development through a community management statement and how they will be maintained in perpetuity; or
 - ii. An access easement over the internal road in favour of the proposed lot in accordance with PO3 of the TAPS code.
- b. For the proposed staging to be accepted, it is required that the Stage 1 carparking and manoeuvring areas are demonstrated to be completely independent of Stage 2. This includes all proposed service vehicle manoeuvring, visitor parking, and resident/ visitor vehicle manoeuvring. Demonstrated all car parking spaces in the basement, podium and ground level, near the staging line have suitable manoeuvring areas for a standard B85 vehicle, in accordance with PO15 of the Transport access parking and servicing code.
- c. The amended large rigid vehicle swept path analysis shows that the vehicle may encroach on the existing dwelling located at 55/12 Chalk Street. The swept path also requires manoeuvring to

encroach into the existing Energex easement and garden bed to the east, which contains essential infrastructure that may not be visible to the driver due to landscaping. Provide the following information in accordance with PO1 and PO18 of the Transport access parking and servicing code:

- i. Include the existing dwelling extent (noting the existing swept path shows the garage incorrectly) and water infrastructure on the swept path.*
- ii. Clearly outline how conflicts between the manoeuvring of the LRV and the existing dwelling and water infrastructure will be managed safely.*
- iii. Provide updated RPEQ certified swept path analysis that demonstrates that a LRV does not impact on the existing dwelling or water infrastructure*

Response:

Please refer to **Attachment D** for the current CMS plan which shows the internal road as common property.

Please refer to **Attachment C** for the response to Item 7(b) and (c).

Item 8 – Bicycle parking relocation

The response to the Information Request has not demonstrated where the existing visitor bicycle parks within the internal road are proposed to be relocated to. Provide amended plans showing where the existing bicycle parking are proposed to be relocated to, ensuring that they maintain compliant visitor bicycle parking rates, in accordance with the requirements of the Transport access parking and servicing code.

NB: Whereby the temporary bicycle parking spaces are not provided as required by the conditions of a previous approval over the site, then a Change Application to that previous approval will be required.

Response:

Please refer to **Attachment A** for the updated proposal plans.

The temporary bicycle parking to the south of Building B has been relocated to the west of the proposed crossover.

Item 9 – Corner truncations

Provide an amended Subdivision plan which reflects the corner truncations required along Bridge Street and Chalk Street and Bridge Street and Merehaye Street which are consistent with the non-trunk corner truncations previously required by the historic approvals over the site

Response:

We refer Council to their recent decision on A006988684 to approve a change to the historic approval on site (Council Ref: A006183051) to allow for the current non-standard corner truncation to remain as existing.

Accordingly, no changes have been made to the Subdivision plan.

Item 10 – Contaminated land flag

As there is assessable development occurring under Schedule 10, Part 4, Division 1 of the Planning Regulation 2017, provide the Site Suitability Statement as per Division 2 to Council for review.

Response:

Please refer to **Attachment E** for the Site Suitability Statement which was provided for the parent site (60 Bridge Street, Woolloowin – Lot 907 on SP337676) on 8 August 2024 confirming the land is suitable for the following uses:

- Land Use B: Residential, childcare centres, preschools, and primary schools where there are minimal opportunities for access to impacted soil (i.e. capped sites), vapour, and/or groundwater. This category also includes dwellings with fully and permanently paved yard spaces such as units, high-rise buildings, and apartments.
- Land Use C: Public open space uses, including parks, playgrounds, and playing fields (e.g. ovals), as well as secondary schools and footpaths.
- Land Use D: Commercial and industrial uses, including shops, offices, factories, and industrial sites.

Summary

This correspondence constitutes the total extent of our response to the Further Advice notice issued by Council on 17 March 2026. We trust the above information assists with the ongoing assessment of the application.

If you have any questions regarding the above or attached material, please do not hesitate to contact the undersigned.

Kind regards,

A handwritten signature in black ink, appearing to read "Kris Krpan". The signature is fluid and cursive, with a vertical line extending downwards from the end.

Kris Krpan
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