Tract

Alfred Street Precinct (PP-2020-74)
Planning Proposals - Gateway Implementation
Department of Planning, Industry, and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/alfred-street-precinct

19 February 2021

To whom it may concern,

Submission on the Alfred Street Precinct Planning Proposal (PP-2020-74)

Tract Consultants Pty Ltd has been engaged by the Owners Corporation representing the owners of 263 - 269 Alfred Street (SP71563) and 4 Little Alfred Street (SP71454), and we are pleased to provide this submission regarding the Alfred Street Planning Proposal (PP-2020-74). Our client's land is identified as Site D within the planning proposal.

The overall precinct is located at a vital gateway site with substantial urban contextual issues including interfaces with the freeway, future off-ramps to the Western Harbour Tunnel, and that the precinct's development already features a significant tower form.

Our client strongly agrees that their site is highly suitable for redevelopment and intensification as part of the Alfred Street Precinct.

Despite appearing to represent a whole of precinct response, the current proposal has been drafted so that it only benefits one landowner in reality. The other properties, adjoining from the proponents, are effectively sterilised by the proposed planning controls as noted:

- The Floor Space Ratio that has been applied to our client's site does not match the minimum FSR that is required to adequately support the cost of the redevelopment as indicated within the proponent's feasibility study; therefore Site D is not able to be redeveloped under the proposed FSR;
- The Height of Building (HOB) does not reflect the HOB required to facilitate the necessary FSR for redevelopment;
- The application of design excellence has not been extended to the whole of the precinct and favours Site B solely; and,
- Site access to Building C is proposed through our clients land – thus effectively hindering Building C from providing separate vehicle access and limiting their development opportunity.

It is respectfully submitted that the proposal needs to be amended to resolve these issues so that the entire precinct is addressed and allows the future redevelopment of all sites realised. Otherwise, Site B is the only property able to be realistically redeveloped. The rest of the precinct is prevented from realising each of their sites' redevelopment potential, and instead only has a 'paper' uplift.

We further discuss each of these critical matters below, which are to be read in conjunction with the enclosed massing study undertaken by AJ+C Architects Pty Ltd (AJ+C).

1 Floor Space Ratio

As part of the original planning proposal, the Economic Feasibility Assessment (EFA) prepared by AEC Group Pty Ltd (Appendix 4) outlined that Site B (please note that Site B in the Feasibility Study relates to Site D in the Planning Proposal documentation) requires a minimum baseline Floor Space Ratio (FSR) of 4.0:1 for the site to be feasibly redeveloped.

> *"While the Site B properties (263-269 Alfred Street and 4 Little Alfred Street) comprise low-rise buildings, a minimum FSR 4:1 required for feasible redevelopment."*

Table ES.3: Feasibility Testing Results, Required FSR*

Development Yield	Site Area (sqm)	Non-residential GFA (sqm)	Residential GFA (sqm)	Total GFA (sqm)	Minimum FSR
Site A					
271-273 Alfred Street	1,031	1,445	1,401	2,846	2.75:1
275 Alfred Street	1,334	1,951	11,552	13,473	10.1:1
283 Alfred Street	872	711	1,818	2,529	2.9:1
Total	**3,237**	**4,107**	**14,741**	**18,848**	**5.82:1**
Site B					
263-269 Alfred Street 4 Little Alfred Street	1,980	1,542	6,378	7,920	4.0:1
Total	**1,980**	**1,542**	**6,378**	**7,920**	**4.0:1**

*assuming FSR 1:1 non-residential floorspace
Source: AEC

Lower FSR thresholds are required for feasible development on Site A properties (FSR 2.75:1, FSR 2.9:1) except the Site which requires FSR 10.1:1. The Site's 18 storey building (existing FSR of 7.3:1) underpins its existing value, which is substantially higher than its neighbours that are 3 storey commercial buildings. The testing presumes that iconic views (and premium revenue) are achievable, otherwise, higher FSRs could be required.

Even though Site B comprises low-rise buildings, a minimum FSR 4:1 is required for feasible redevelopment.

Note: Site B in the Feasibility Study relates to Site D in the Planning Proposal documentation.

Figure 1. Economic Feasibility Assessment Report – Table ES.3 AEC Feasibility Testing Results, Required FSR (Source: AEC Group Pty Ltd, 2018)

The Planning Proposal includes a proposed FSR for Site D of 3.5:1.

We understand that the premise of this ratio reflects the previously abandoned Council Planning Study. However, we note that the Council study was prepared without the benefit of an economic feasibility study and did not reflect a base case required to support the site's redevelopment.

In preparing the enclosed modelling, AJ+C has approximately recreated the proponent's illustrative design scheme examples modelled by Grimshaw. AJ+C has advised that the design scheme concepts submitted with the proposal highlight the site's potential redevelopment with an FSR closer to 3.05:1 rather that the proposed 3.5:1.

Our client strongly submits that the starting point for Site D's redevelopment must be a minimum FSR of 4.0:1. It is submitted further that an FSR of 4.5:1 would, in reality, represent an appropriate additional margin beyond the minimum base case better to encourage future site consolidation and the redevelopment of the sites.

The increase from 4.0:1 to 4.5:1 represents only one additional floor on the part of the site. To demonstrate this point, please refer to the enclosed concepts by AJ+C within their massing study.

2 Height of Building

The current planning proposal includes a proposed Height of Building (HOB) of 29m to Site D.

This HOB reflects an FSR of 3.5:1 with two-storeys at commercial heights of 4m and the additional residential at 3m mostly in accordance with the principles of the proposed DCP.

AJ+C has prepared the enclosed massing study with the following key elements:

- Three-storey townhouse dwellings fronting Little Alfred Street to provide a suitable built form transition and interface at a human scale to the existing residential development east of the precinct; and
- Consequently, increase the height towards the west of the Site to achieve three-storeys of commercial floor height (4m each) with upper floor residential at 3m height.

To facilitate the required minimum feasible base case FSR of 4.0:1, the HOB required is to be a minimum of 39m. To ensure that Site D can be redeveloped at the optimally feasible FSR of 4.5:1, an additional floor should be allowed, increasing the overall HOB to 42m.

To further support this point, please refer to the yield assessments within the enclosed massing study by AJ+C.

3 Design Excellence Bonus

The 'Area A' design excellence bonus overlay appears to have been applied on a site-specific basis related to the site under ownership of the PP proponent. Our client sees no merits reasons why the design excellence bonus design should not be extended to include the entire Alfred Street Precinct.

Applying the design excellence overlay to the precinct, the Planning Proposal would more accurately reflect a consistent precinct approach towards the planning and design of the Alfred Street Precinct and support high-quality design in future development applications.

On this basis, our client's position is that the proposed 'Area A' design excellence bonus overlay, with contextually appropriate FSR and HOB bonuses, should be applied to the whole precinct to drive high quality architectural and urban design outcomes across the precinct.

4 Architectural Testing by AJ+C

To explore and support the planning positions regarding FSR, HOB and Design Excellence, our client has engaged AJ+C to undertake site-specific architectural testing for Site D and consider the implications for other sites.

The architectural brief was to accurately evaluate the FSR and height of building required to achieve feasible redevelopment. AJ+C consideration is further articulated in section 5 below.

A yield schedules summary of AJ+C's modified design schemes in terms of proposed FSR and HOB is as follows:

Site	Proposed HOB	Proposed FSR	Residential FSR	Non-residential FSR	Total FSR
Site D	39 m	4.0:1	3.17	0.76	3.92:1
	42 m	4.5:1	3.72	0.76	4.48:1

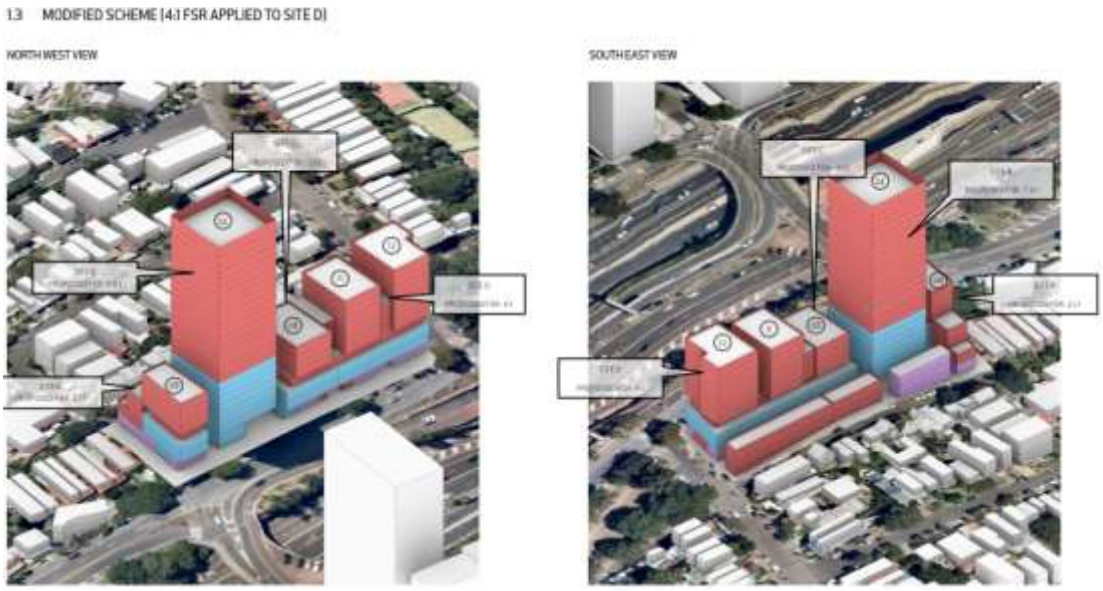

Figure 2. Applying 4:1 FSR to Site D – Alfred Street Massing Study (Source: AJ+C, 2021)

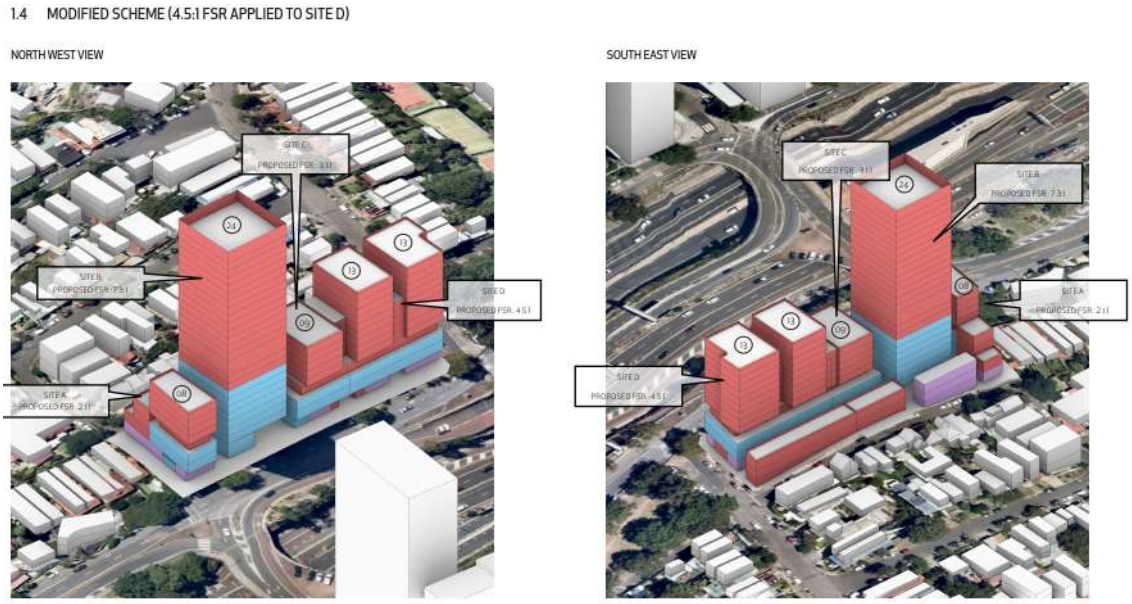

Figure 3. Applying 4.5:1 FSR to Site D – Alfred Street Massing Study (Source: AJ+C, 2021)

MODIFIED SCHEME (4:1 FSR)

Residential Areas

Site-Building	Storeys	NSA	GFA	FECA	UCA	NSA/GFA	NSA/FECA
A_283	8	864	1,091	1,208	189	79%	72%
B_275	22	5,852	6,949	7,690	1,204	84%	76%
C_271-273	8	1,418	1,856	2,054	322	76%	69%
D_263-269	12	4,807	6,056	6,702	1,050	79%	72%
		12,941	**15,953**	**17,654**	**2,765**		

Non Residential Areas

Building	Use	NSA	GFA	FECA	UCA	NSA/GFA	NSA/FECA
A_283	Retail	127	141	226	0		56%
L1 and L2	Commercial	493	548	619	0		80%
B_275	Retail/Cultural	78	87	139	0		56%
L1 - L4	Commercial	2,846	3,162	3,571	0		80%
C_271-273	Retail	157	174	278	0		56%
L1 and L2	Commercial	842	935	1,056	0		80%
D_263-269	Retail	230	255	408	0		56%
	Commercial	1,033	1,148	1,296	0		80%
Totals		**5,805**	**6,450**	**7,594**	**0**		

Carparking areas

Site-Building	Use	NSA	GFA	FECA	UCA
A_283	Carparking		0	453	0
B_275	Carparking		0	2,842	0
C_271-273	Carparking		0	747	0
D_263-269	Carparking		0	628	0
Total		**0**	**0**	**4,669**	**0**

Residential numbers and mix

Building	Unit Type	Studio	1B	1B+Study	2B_Sm	2B_Lg	3B	Total
	Mix	0%	10%	25%	25%	35%	5%	100%
	Average NSA	45	50	60	75	85	95	73
A_283		0	1	3	3	4	1	**12**
B_275		0	8	20	20	28	4	**80**
C_271-273		0	2	5	5	7	1	**20**
D_263-269		0	7	16	16	23	3	**66**
		0	18	44	44	62	9	**178**

Carparking numbers

	Residential	Non Residential
A_283	11	1
B_275	66	10
C_271-273	17	2
D_263-269	53	2
PUBLIC PARKING	*(STREET LOSS)*	13
CAR SHARE	2	
	149	**28**

Site Summary

FECA+UCA - Residential	20,419
FECA+UCA - Non residential	7,594
FECA+UCA - Carparking	4,669
FECA+UCA - Total	32,682
GFA - Non Residential	6,450
GFA - Residential	15,953
GFA - Total	**22,402**
Site Area - Total	**5,033.0**
FSR - Non Residential	**1.28 :1**
FSR - Total	**4.45 :1**
No. of apartments	**178**
No. of cars	**177**

Permissible FSR

	Current	Allowed	Difference
A_283	1.80	3.50	**-1.70 :1**
B_275	7.30	3.50	**3.80 :1**
C_271-273	1.88	3.50	**-1.62 :1**
D_263-269	1.67	3.50	**-1.83 :1**

Disclaimer — This is for high level feasibility only and all projections are approximate

Proposed FSR

	Residential	Non residential	Total
A_283	1.29	0.82	**2.11 :1**
B_275	5.18	2.42	**7.60 :1**
C_271-273	1.97	1.18	**3.14 :1**
D_263-269	3.18	0.74	**3.92 :1**
Total		=	

Site Areas

	Total Site
A_283	843.0 m²
B_275	1,342.0 m²
C_271-273	943.0 m²
D_263-269	1,905.0 m²
Total	

Definitions

Rev A — Date

- FSR is Floor Space Ratio = GFA (LEP)/Site Area
- NSA is Nett Sellable Area measured to the inside face of enclosing walls excluding voids above a floor and balconies
- GFA (LEP) is Gross Floor Area measured as defined by the governing Local Government Authority
- FECA is Fully Enclosed Covered Area as defined by the Australian Standard Method of Measuring Building Works
- UCA is Uenclosed Covered Area as defined by the Australian Standard Method of Measuring Building Works
- Efficiency = NSA/FECA

Figure 4. Indicative Yield Schedule – 4.0:1 FSR Modified Design Scheme (Source: AJ+C, 2021)

MODIFIED SCHEME (4.5:1 FSR)

Residential Areas

Site-Building	Storeys	NSA	GFA	FECA	UCA	NSA/GFA	NSA/FECA
A_283	8	864	1,091	1,208	189	79%	72%
B_275	22	5,852	6,949	7,690	1,204	84%	76%
C_271-273	8	1,418	1,856	2,054	322	76%	69%
D_263-269	13	5,706	7,114	7,873	1,233	80%	72%
		13,840	**17,010**	**18,824**	**2,948**		

Non Residential Areas

Building	Use	NSA	GFA	FECA	UCA	NSA/GFA	NSA/FECA
A_283	Retail	127	141	226	0		56%
L1 and L2	Commercial	493	548	619	0		80%
B_275	Retail/Cultural	78	87	139	0		56%
L1 - L4	Commercial	2,846	3,162	3,571	0		80%
C_271-273	Retail	157	174	278	0		56%
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D_263-269	Retail	230	255	408	0		56%
	Commercial	1,033	1,148	1,296	0		80%
Totals		**5,805**	**6,450**	**7,594**	**0**		

Carparking areas

Site-Building	Use	NSA	GFA	FECA	UCA
A_283	Carparking		0	453	0
B_275	Carparking		0	2,842	0
C_271-273	Carparking		0	747	0
D_263-269	Carparking		0	628	0
Total		**0**	**0**	**4,669**	**0**

Residential numbers and mix

Building	Unit Type	Studio	1B	1B+Study	2B_Sm	2B_Lg	3B	Total
	Mix	0%	10%	25%	25%	35%	5%	100%
	Average NSA	45	50	60	75	85	95	73
A_283		0	1	3	3	4	1	**12**
B_275		0	8	20	20	28	4	**80**
C_271-273		0	2	5	5	7	1	**20**
D_263-269		0	8	19	19	27	4	**78**
		0	19	47	47	66	10	**190**

Carparking numbers

	Residential	Non Residential
A_283	11	1
B_275	66	10
C_271-273	17	2
D_263-269	64	2
PUBLIC PARKING	*(STREET LOSS)*	13
CAR SHARE	2	
	160	**28**

Site Summary

FECA+UCA - Residential	21,773
FECA+UCA - Non residential	7,594
FECA+UCA - Carparking	4,669
FECA+UCA - Total	34,036
GFA - Non Residential	6,450
GFA - Residential	17,010
GFA - Total	**23,460**
Site Area - Total	5,033.0
FSR - Non Residential	**1.28 :1**
FSR - Total	**4.66 :1**
No. of apartments	**190**
No. of cars	**188**

Permissible FSR

	Current	Allowed	Difference
A_283	1.80	3.50	**-1.70 :1**
B_275	7.30	3.50	**3.80 :1**
C_271-273	1.88	3.50	**-1.62 :1**
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Proposed FSR

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B_275	5.18	2.42	**7.60 :1**
C_271-273	1.97	1.18	**3.14 :1**
D_263-269	3.73	0.74	**4.47 :1**
Total			

Site Areas

	Total Site
A_283	843.0 m²
B_275	1,342.0 m²
C_271-273	943.0 m²
D_263-269	1,905.0 m²
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- Efficiency = NSA/FECA

Figure 5. Indicative Yield Schedule – 4.5:1 FSR Modified Design Scheme (Source: AJ+C, 2021)

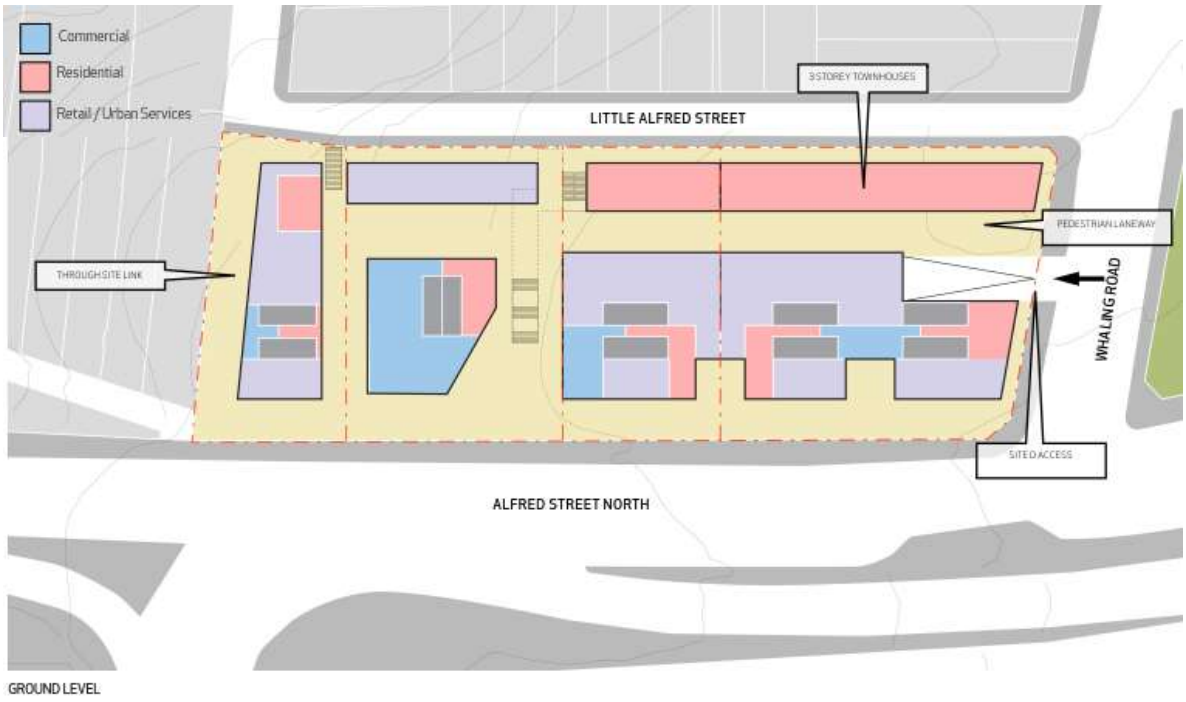

Figure 6. Indicative Reference Plans - Ground Level Layout & Vehicle Access (Source: AJ+C, 2021)

Figure 7. Shadow Analysis Extracts (11 am – 12 pm Mid-Winter) – Alfred Street Massing Study (Source: AJ+C, 2021)

Figure 8. Shadow Analysis Extracts (1 pm – 3 pm Mid-Winter) – Alfred Street Massing Study (Source: AJ+C, 2021)

Disclaimer: The above context model was built from the data gathered by Tract as part of our original model, which provided context to the proposal. The above model was tested and included height checks from buildings along Arthur Street from Paciific Highway extending up to in-between Mount Street and Berry Street. As limited data was available, the latest modelling done as part of the Grimshaw planning proposal might vary slightly.

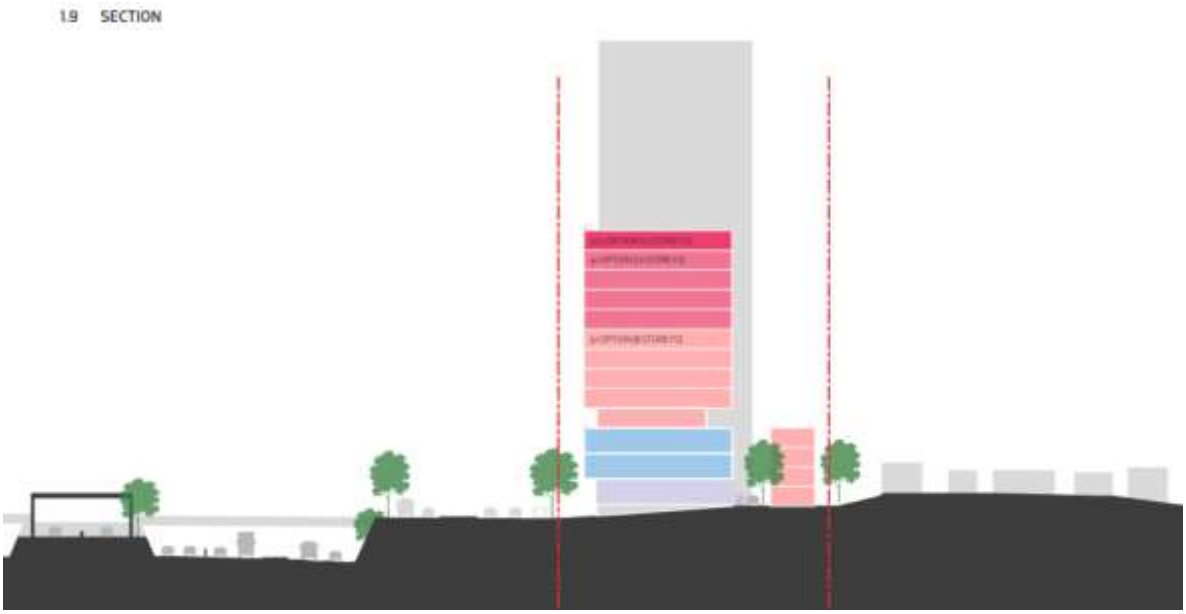

Figure 9. Section Drawing [looking north] – Alfred Street Massing Study (Source: AJ+C, 2021)

5 Urban Design Rationale & Comments on Proposed Site-Specific DCP (AJ+C)

AJ+C reviewed the Grimshaw planning proposal documents and the proposed site-specific DCP.

AJ+C generally supported the approach but noted that any resulting uplift is not equally shared across each of the sites. AJ+C in through their study and analysis on behalf of our client, has modified the proposed design scheme to more appropriately consider the other sites and achieve a balanced precinct-wide development.

The AJ+C design scheme includes the following improved urban outcomes:

- Introduction of clear open to the sky 6m setback from the north boundary, limiting the building height on Site A to 8 storeys. This setback will secure a critical through site connection via Mount Street and the North Sydney CBD;
- Proposed 4.5m setbacks from the Site B boundaries to both Site A and Site C based on minimum ADG 3F-1 requirements. These changes have considered the apartment planning ability to provide openings from either non-habitable rooms or only secondary openings (screened) from habitable rooms to provide ADG compliant cross-ventilation;
- Reinforced permeable connections with clear site lines along the southern side of the Site B tower from Alfred Street North to Little Alfred Street;
- Introduced a three-four storey wide frontage townhouse product to Alfred Lane that is setback 1.5m to enable an improved public domain outcome;
- The pedestrian laneway is reduced to 6m wide, open to the sky, to deliver the Little Alfred Street widening (1.5m footpath + 1.5m private open space setback;

- AJ+C has designed the built form to deliver the vehicle access arrangements for each site separately as per the site-specific DCP. However, AJ+C remains of the view, notwithstanding the likelihood of RMS not supporting vehicle entry / exit to Alfred Street North, that a shared vehicle entry from Alfred Street North will result in a far superior urban design outcome across the Precinct because:
  - It results in far more activated frontage along the internal pedestrian laneway;
  - Ensures vehicular entries do not dominate the park frontage;
  - It provides a safer pedestrian environment compared to a parallel ramp arrangement and loading to Little Alfred Street, and;
  - The alternate arrangement of a left in - left out vehicular entry on Alfred Street North does not increase traffic numbers.
- Overshadowing of the park in terms of the building height in Site D, is minimised by sharing the built form height over two cores. The result of which creates, in AJ+C's view, a superior built form composition compared to a fragmented option with a higher building height on the northern core of Site D; and
  - AJ+C also notes that this judgement would need to be exercised in consideration of comparative overshadowing impacts to the surrounding areas;
- The modified scheme retains the commercial podium appropriate to the freeway and CBD to the west while maintaining a smaller scale residential to the east. The mix of uses will help maintain a 24 / 7 live-work environment for the Precinct and its surroundings.

6 Overshadowing

Concerning the public realm, Figure 4 and 5 and the enclosed modelling by AJ+C indicates that the public park located south of the site may be impacted by overshadowing – particularly during the 12 pm to 1.30 pm period mid-winter.

Further, the impacts from the proposed HOB increases for Site D on existing residential properties to the east and any resultant overshadowing are not likely to be substantial. Those existing residential properties to the east would continue to enjoy the required solar access between 10 am and 2 pm. Any overshadowing beyond those hours would need to be considered together with the shadow cast mid to late afternoon by the existing North Sydney CBD, which already eclipses any likely shadow from the proposed Site D development.

7 Access

The DCP prepared as part of the Planning Proposal initially proposed to provide access to Site C through Site B. In the last revision of documents, access to Site C now appears to be through Site D.

Respectfully, we submit that access to each of the Alfred Street Precinct sites within the precinct should be available independently from the other as per existing conditions, consequently enabling individual redevelopment if required.

8 Conclusion

As currently proposed, our client's site - Site D - and that of the neighbouring site - Site C - would not equitably benefit from the Alfred Street Planning Proposal. Instead, each of the sites is hindered from pursuing any redevelopment opportunities in the future.

As stated above, our client supports the planning proposal in its intent and in particular, the proposed zoning for mixed-use purposes. However, our client's position respectfully seeks the following amendments to ensure an equitable and holistic outcome for the Alfred Street Precinct:The FSR of 4.5:1 should apply to Site D to allow for feasible redevelopment;

- A HOB of 42m should be applied to Site D to allow the required FSR for feasible redevelopment;
- The DCP should be amended to provide / allow for individual site access;
- The 'Area A' design excellence bonus overlay should be applied to the whole precinct – rewarding high-quality urban and architectural designs with FSR and HOB bonuses consistently.

Yours sincerely

Leonard Slabbert
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