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18 December 2020

Mr James Groundwater
Senior Planning Officer
Department of Planning, Industry and Environment
Via email

Dear James,

PITT STREET SOUTH OSD - RESPONSE TO REQUEST FOR INFORMATION #2

This letter provides a response to the Request for Information (RFI) prepared by the Department of Planning, Industry, and Environment (DPIE) dated 26 November 2020. In accordance with the RFI, this letter provides supplementary information for the assessment of SSD 8876 and SSD 10376 relating to the Pitt Street South Over Station Development.

1. UPDATED PLANS AND DOCUMENTS

1.1. GRC ELEMENTS

This letter is accompanied by revised Architectural Plans (**Attachment A**) which include modifications to the proposed façade detailing on the northern, eastern, and western building elevations.

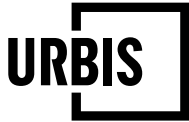
The DPIE have requested an additional description and illustration of recent amendments to the façade in relation to the location of the GRC 'columns' proposed for the over station development. We clarify that the GRC are not 'columns' but elements on the external face of the building. They do not provide structural benefits to the building.

We note the number and depth of the GRC elements were proposed to be amended in the Supplementary Design Report lodged with the RFI (#1) response dated 12 November 2020, compared to the Response to Submissions package dated 23 September 2020.

As part of the Response to Submissions package, the applicant proposed a reduction in the depth of the proposed GRC elements to minimise impacts to Princeton Apartments located south of the site.

However following a review of 1:1 printed detailing of the Response to Submissions proposed GRC elements, the Design Review Panel (DRP) provided feedback that they did not support the reduction in depth of the GRC on the northern, eastern and western façades as the flattening of these elements was perceived to change the architectural expression of depth and relief in the façade. Notwithstanding, the panel did support a change in the width of the GRC elements from 800mm to 900mm as proposed in the Response to Submissions package.

The DRP also noted that there was a reduction in the number of GRC elements proposed on each façade, and the reduction in solid elements on the façade impacted the achievement of design excellence. Following receipt of this feedback, the design team undertook additional architectural studies to increase the number of GRC elements on the façade and re-instate the original depth of the



elements, with the exception of the southern façade, and presented these changes to the DRP. This change is reflected in the revised Architectural Plans at **Attachment A**.

As outlined in the Design Integrity Report submitted with the response to RFI dated 12 November 2020, the DRP supported the reduction of seven elements compared to the original State Significant Development Application (**SSDA**) scheme. The DRP also recommended specific changes to the location of the 'columns' along the western façade of the north-western corner, and the eastern face of the north-eastern corner to achieve a slightly more varied and less regular spacing which is more consistent with the SSDA design. As outlined in the Design Integrity Report, the DRP have now provided their support for the current GRC elements proposed on the building façades.

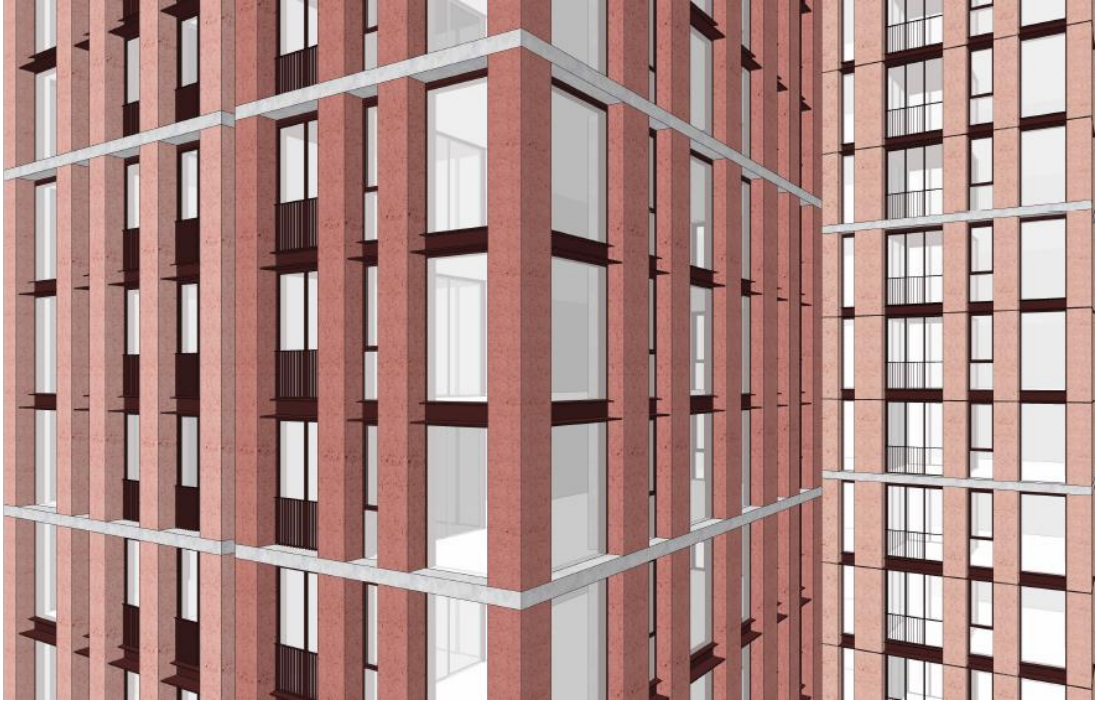
Table 1 provides a numeric breakdown comparing detail of the GRC elements proposed in the original SSDA Architectural Plans, the Response to Submissions package, and the current Architectural Plans included at **Attachment A**.

Table 1 Detail Comparison of GRC Elements

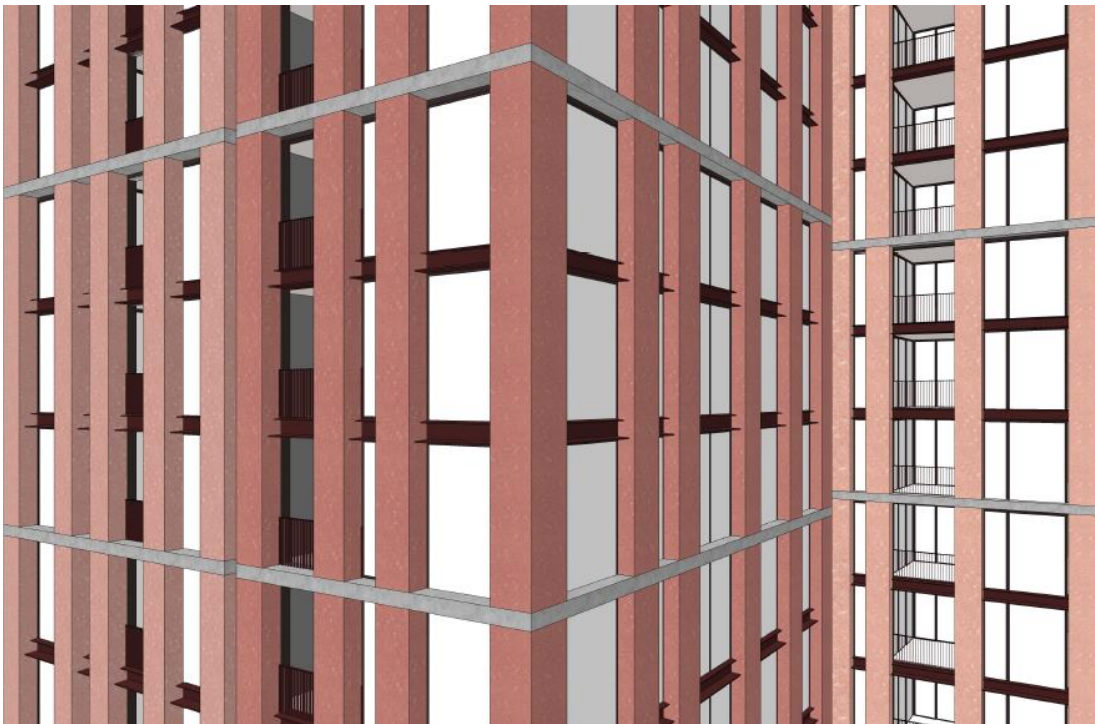
Detail	Original SSDA Scheme	Response to Submissions Update	Current Design Endorsed by DRP
Number of GRC Elements	51	39	44
Depth	400 mm + 50mm shadow gap	325mm total depth for North, East and West Elevations	400 mm + 50mm Shadow Gap for North, East and West Elevations
Elevations	Applies to all four elevations	250mm South Elevation	250mm South Elevation
Glass to Solid Ratio	1.9:1	2.22:1	1.9:1

Figure 1 provides a visual comparison of the location and depth of the GRC elements included in the original SSDA and the current proposed when viewed from the north western façade. Further visualisations are provided in the Supplementary Architectural Design Report issued to DPIE on 12 November and attached again at **Attachment B** for reference.

Figure 1 Comparison of GRC column locations and depth

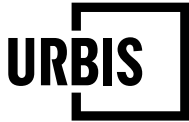


Picture 1 North West Façade – Original SSDA scheme



Picture 2 – North West Façade – Current scheme (DRP endorsed GRC)

Source: Bates Smart



The DPIE have also requested detail on whether the proposed changes to the GRC configuration have impacted any analysis submitted with the Response to Submissions, in particular the Supplementary Solar Analysis Statement provided by Wash Analysis, dated 10 November 2020, and the projections/encroachment on the approved building envelopes and respective site boundaries. These items are addressed in the following sub-sections.

1.2. SOLAR AMENITY

In the original SSDA application it was stated that 119/234 (50.9%) of the proposed build-to-rent dwellings achieve 2 hours or more sunlight to living area glazing and private open space between 9am and 3pm in mid-winter. This figure has been reduced by one apartment to 116/234 (49.6%) in the latest solar modelling included at **Attachment C**.

As a result of modelling façade detailing, including the depth of the GRC and the latest design for the revised apartment layout on the south eastern corner of the typical floorplate, the overall solar amenity of the proposed dwellings has marginally decreased when compared to the improvements gained in the Response to Submissions package.

For completeness, it is noted that 116/234 (49.6%) of the proposed build-to-rent dwellings achieve 2 hours or more sunlight to living area glazing and private open space between 9am and 3pm in mid-winter. 54/234 (23.1%) of the proposed build-to-rent dwellings achieve no direct sun between 9am and 3pm in mid-winter.

The explicit design guidance in the ADG acknowledges that on some sites full compliance with the deemed to satisfy design criterion may not be possible. The reasonable expectation of compliance in an area undergoing change and experiencing overshadowing by surrounding development should be considered in this instance. While the above figures do not comply with the relevant ADG design criterion, the proposal achieves the ADG Objective 4A-1. As stated by Scott Walsh at **Attachment C**, if the building could have a far greater glazed façade, and it was situated in a green field site, the development would achieve 100% solar compliance through its layout.

The revised Walsh2Analysis provided at **Attachment C**, recognises that the design of the proposed development has maximised solar exposure to living areas through the orientation of apartments, location of apartments within the building, and recessed position of bedrooms. Further, there are no single south facing units meaning that units which do not receive sunlight in the development is not a result of compromised design but rather from overshadowing to the site.

While overshadowing of surrounding buildings makes a significant impact on the achievement of sunlight to habitable rooms, primary windows and private open space (accounting for a reduction of 47.4% in this instance), the external façade can also impact the achievement of solar access to dwellings. The proposed GRC glazing depth accounts for a reduction of 1.7% (during 9am-3pm in mid-winter) and the proposed changes to south east apartment accounts for a reduction of 1.3%.

As the façade detailing included in the latest Architectural Plans contributes significantly to the achievement of design excellence, the reduction of dwellings achieving the minimum 2 hours solar access is considered acceptable. As such, the proposed development achieves ADG Objective 4A-1 to optimise sunlight to habitable rooms, primary windows and private open space within the context of the site.

1.3. PROJECTIONS

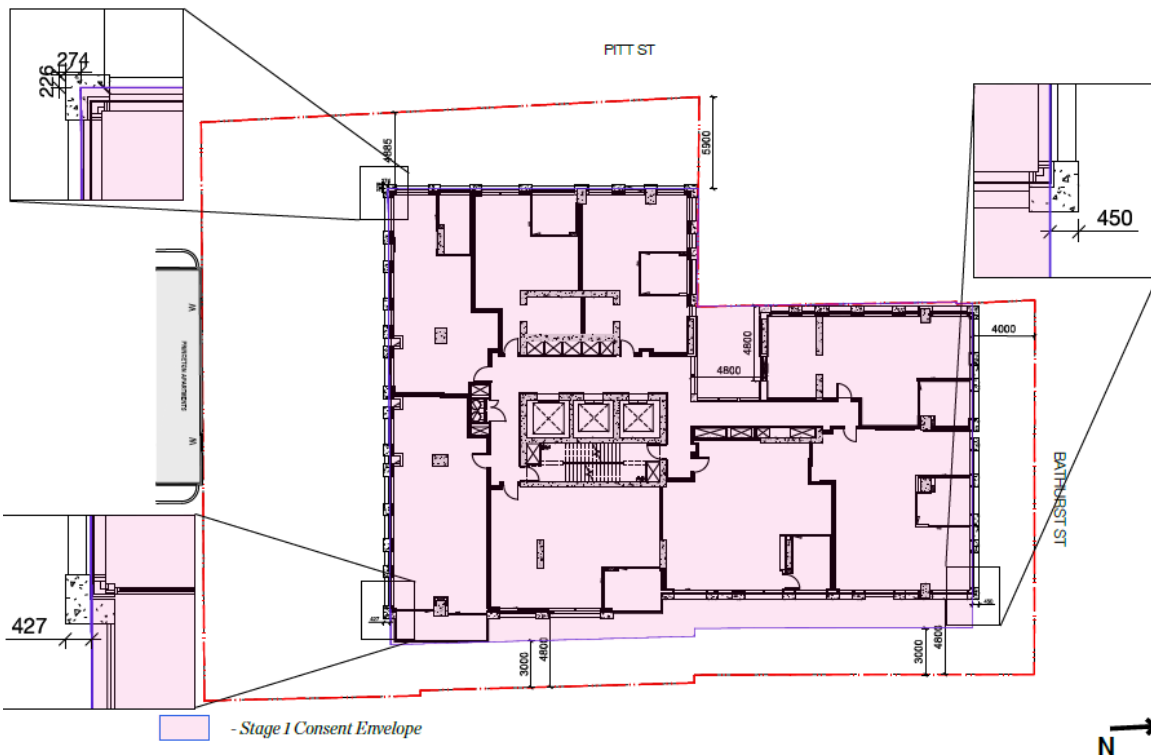
Bates Smart Architects has prepared a diagram at Figure 2 and attached at **Attachment D** which shows the extent of projections proposed beyond the approved concept envelope. As outlined in this figure, the depth of the projections from the approved concept envelope remains reduced from the original SSDA on the southern and western elevations. No building extent has ever been proposed to project beyond the site boundary.

In summary the maximum projections from the approved concept envelope proposed in the original SSDA and now within the Architectural Plans at **Attachment D** are provided in Table 2.

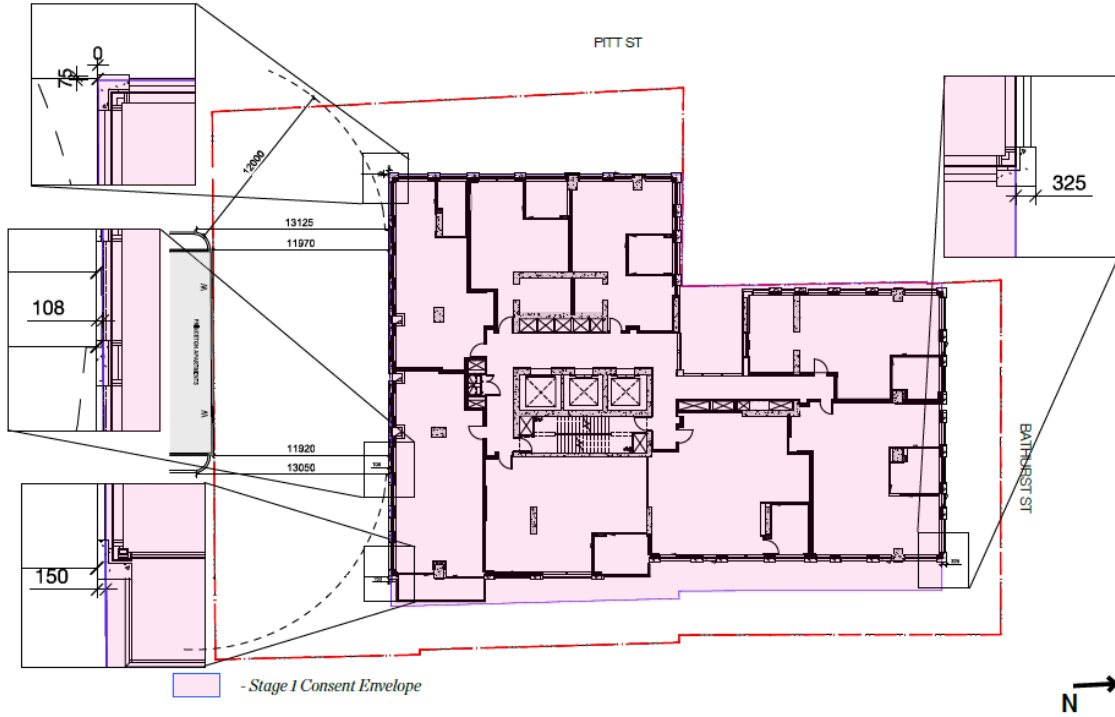
Table 2 Summary of maximum projections from approved envelope

Detail	Original SSDA Scheme	Response to Submissions Update	Current Design Endorsed by DRP
South Elevation	Max. 427mm	Max. 150mm	Max. 150mm
East Elevation	Zero projection	Zero projection	Zero projection
North Elevation	Max. 450mm	Max. 450mm	Max. 450mm
West Elevation	Max. 226mm projection to Pitt Street; zero projection to Edinburgh Castle Hotel	Max. 75mm projection to Pitt Street; zero projection to Edinburgh Castle Hotel	Max. 200mm projection to Pitt Street; zero projection to Edinburgh Castle Hotel

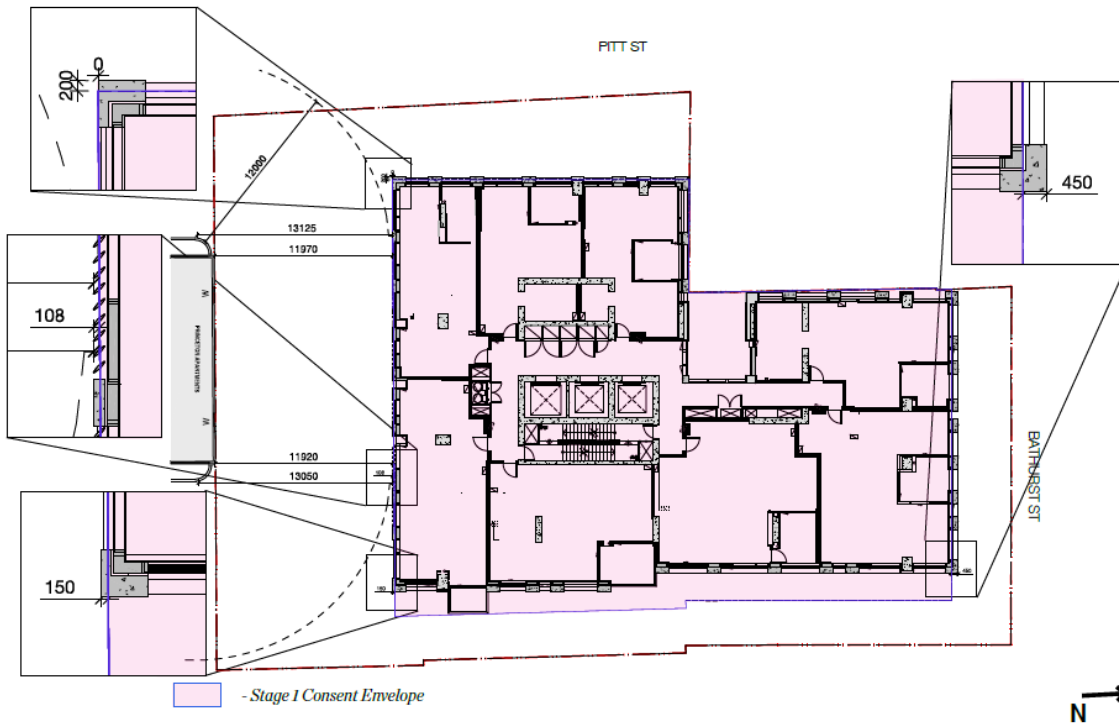
Figure 2 Comparison of projections from the building envelope



Picture 3 Original SSDA Plan Projection Plan

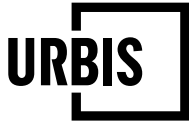


Picture 4 Response to Submissions Projection Plan



Picture 5 – Current Proposed Projection Plan

Source: Bates Smart



1.4. GFA

The DPIE have sought confirmation as to whether the changes to the GRC elements and building floorplates has resulted in a change in gross floor area (**GFA**) proposed across the site.

The floorplates proposed within the SSDA application comprised 649.5sqm GFA per typical floor. Through very minor changes to internal building configurations, the current design also comprises 649.5sqm GFA per typical floor. The total proposed GFA remains unchanged from the previous design.

1.5. BASIX

In accordance with the DPIE request, a BASIX Certificate and stamped plans (including the final location and design of the GRC elements described and proposed in Section 1.1 of this letter) is provided at **Attachment E**.

2. DESIGN GUIDELINES

The DPIE have requested additional analysis detailing how the proposed building articulation and setbacks along the Pitt Street and eastern boundary would minimise shadow impacts to the Princeton Apartments.

It is confirmed that the Princeton Apartments receive a total of 168 minutes of additional solar access as a result of the proposed development compared to the approved concept envelope (an increase of 12 minutes since the original SSDA lodgement package). This is achieved by the proposed increase in the eastern setback, as well as reduced building massing at the lower levels as highlighted in the Response to Submissions package.

In looking to minimise solar impacts to Princeton Apartments, two primary moves were considered:

- An 8m increase to the western setback from Pitt Street would increase solar access to 15 dwellings within Princeton Apartments by a maximum of 12 minutes (amount varies for each unit) in mid-winter. Such a significant setback would however reduce the solar compliance of the proposed development from 49.6% to 41.5%, while not improving the Princeton Apartments solar compliance figures under the Apartment Design Guide (**ADG**).
- A 6.2m setback to the south western corner apartment proposed, instead of the proposed 4.7m setback, would result in a maximum increase of 6 minutes solar access to 9 units within the Princeton Apartments.
- Conversely it was found that the proposed eastern setback (4.5m compared to the minimum 3m concept envelope setback) provides an additional 5-minutes solar access to 12 dwellings within Princeton Apartments.

Moving the building towards the west, as currently proposed, has increased the solar access for Princeton Apartments compared to the approved concept building envelope without significantly impacting solar compliance of the proposed development. As such the current configuration of the proposed development achieves the outcomes of the Design Guidelines, specifically to “Maximise sunlight access and views for adjoining and surrounding properties” and to “maximise solar access to the living rooms of Princeton Apartments between 9am-3pm at winter solstice”.

Further, as demonstrated within the memo provided by Walsh2Analysis at **Appendix C**, the proposed amendment to the eastern balcony also results in an increased area of solar access to the Princeton Apartments (notwithstanding the numeric figures do not change beyond 1sqm) resulting in improved amenity to these units.

By demonstrating that the proposal has minimised impacts to the solar amenity of Princeton Apartments by proposing setbacks that improve the solar access compared to the approved concept DA and alternative setbacks from Pitt Street, the proposal satisfies Condition B3(e) of the concept SSDA to minimise solar impacts to the living rooms of Princeton Apartments.

3. ADDITIONAL MATTER

In addition to the written request dated 26 November 2020, we note that the DPIE has queried the ventilation of certain window openings located adjacent to the revised location of the GRC elements. The windows in question are identified in red mark-up in the image below.

Figure 3 Identification of windows

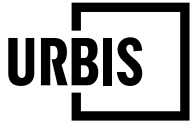


Source: DPIE and Bates Smart

Bates Smart have reviewed the window openings in question and confirm that each of the small windows highlighted are **not** required to meet minimum BCA / ADG ventilation requirements of the rooms affected.

In all cases, these spaces (mostly living rooms, and one bedroom), achieve well in excess of the minimum 5% of floor area of unobstructed window opening via the main sliding doors (or unrestricted casement window, in the case of the bedroom) that open onto the balcony. The windows identified merely provide an additional amenity benefit to facilitate greater crossflow opportunities for residents.

We trust that the information contained within this letter addresses the DPIE RFI dated 26 November 2020 and provides clarity as to the design direction and impacts associated with the minor refinements



to the GRC elements. Further we trust that this additional information satisfies the DPIE on other minor details associated with SSD 8876 and SSD 10376.

Should you require any further detail or confirmation, please do not hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to read "A. Ryan". The signature is fluid and cursive, with a horizontal line extending to the right.

Ashleigh Ryan
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Attachment A – Proposed Architectural Plans

Attachment B – Supplementary Architectural Design Report (RFI #1)

Attachment C – Walsh2Architects Solar Access Memo of Design Changes & Solar Implications

Attachment D – Comparison of Projections to Approved Envelope & Site Boundary

Attachment E – BASIX Stamped Plans