

STATE SIGNIFICANT DEVELOPMENT APPLICATION (SSDA)

Subject: 271-273 Alfred Street, North Sydney, NSW
Date: 1 July 2026

Project: 157366.00
Version: C

This letter is to advise that Holmes has been engaged by GenUrban Projects Co Pty Ltd on behalf of Tara Shore Pty Limited to provide fire engineering services for the proposed residential development, to be located at 271-273 Alfred Street, North Sydney, NSW.

1 INTRODUCTION

This DA Letter has been prepared by Holmes Australia Pty Ltd on behalf of Tara Shore Pty Ltd ATF John Taylor Family Trust (the Applicant) in support of a State Significant Development Application (SSDA) identified as SSD-103541730 which seeks approval for a 38-storey mixed-use housing development, located at 271-273 Alfred Street, North Sydney (the site).

The site is located within the North Sydney Local Government Area (LGA). The site comprises two allotments which are legally identified as Lot 1 DP 532504 (271 Alfred Street) and SP6830 (273 Alfred Street). It is rectangular in shape and has street frontages to Alfred Street to the west and Little Alfred Street to the east (both measuring approximately 23 m). The existing building on the site is a three-storey commercial building.

The proposal was declared State Significant Development (SSD) in State Significant Declaration Order (No.15) 2025 (the Order), which specified that the development detailed in EOI No.279422, including a mixed-use development located at the site be declared as SSD. The Order enables SSD-103541730 to be undertaken via the Housing Delivery Authority (HDA) pathway, including a concurrent rezoning proposal to the North Sydney Local Environmental Plan 2013 (North Sydney LEP). A site aerial is provided in Figure 1-1.

The proposal involves two components: the SSDA and the concurrent rezoning of the site. Holmes is involved with the SSDA component which seeks consent for:

- The demolition of the existing building on the site;
- Construction of a 38-storey mixed use development, comprising:
 - 9 levels of basement car parking, comprising plant and bicycle storage area;
 - Commercial tenancies on Level 2;
 - Residential uses on Level 3 and above, comprising 95 apartments.
- Landscaping and public domain works;
- Extension and augmentation of services and infrastructure as required, this includes fire safety systems; and
- Lot amalgamation and stratum subdivision of the site.



 The Site

1 Lot 1/DP532504

2 CP/SP6830



NOT TO SCALE

Figure 1-1 Site Aerial Map (Source: Nearmap / edited by Colliers Urban Planning)

The rezoning component seeks consent to amend the North Sydney LEP, comprising:

- Rezone the land use zone of the site from E2 Commercial Centre to MU1 Mixed Use;
- Amend the maximum building height from 13m to RL 166.5m;
- Amend the maximum floor space ratio from 3.5:1 to 13.9:1; and
- Introduce a site-specific clause requiring 15% of residential Gross Floor Area (GFA) to be used as affordable housing and managed by a CHP for a period of at least 15 years.

For a detailed project description refer to the Environmental Impact Statement and Rezoning Report prepared by Colliers Urban Planning.

A Building Code of Australia, 2022 Amendment 2 (BCA)¹ assessment has been undertaken by Philip Chun, dated 18 June 2026, report reference 26-224797, revision number 2. This report identified a number of non-

¹ Australian Building Codes Board, National Construction Code Series 2022 Amendment 2, Volume 1, Building Code of Australia, Class 2 to Class 9 Buildings. Australian Building Codes Board, CAN, Australia, 2023.

compliances with the Deemed-to-Satisfy Provisions of the BCA that are proposed to be addressed by Holmes through Performance Solutions.

2 PROPOSED PERFORMANCE SOLUTIONS

Holmes will address the identified non-compliances using performance-based fire engineering solutions. The performance-based solutions will comply with the relevant Performance Requirements of the BCA. The design approach will be in line with the Australian Fire Engineering Guidelines² and other acceptable guideline documents.

The Performance Solution designs will be developed in line with BCA Clause A2G2, as applicable; i.e. complying with the relevant Performance Requirements or by equivalence comparison with the Deemed-to-Satisfy Provisions.

The identified non-compliances and proposed approach of the Performance Solution for each issue is listed below. Holmes understands that all other aspects of the building will comply with the Deemed-to-Satisfy Provisions of the BCA.

- BCA Clause C2D2 and S5C8 requires shafts which are required to have a Fire Resistance Level (FRL) to be enclosed at the top and bottom by construction having an FRL not less than that required for the walls of a non-loadbearing shaft in the same building. It is proposed not to enclose the garbage chute shaft with fire rated construction at the base of the shaft where it connects to the chute discharge room on the first floor. A Performance Solution using a comparative approach will be provided to address Performance Requirement C1P2 and C1P8 to allow for an unenclosed base of the shaft leading to the garbage room on the First Floor. The provision of fire and smoke separation of the chute discharge room and fire rated hoppers at each floor will be relied upon as part of the solution.
- BCA Clause C2D2 and Spec 5 requires fire rated slabs and internal walls to extend to the outer face of the external wall. Due to the lightweight façade, the walls and slab do not extend to the outside face of the external wall and there are no tested systems for lightweight façades. A Performance Solution using an absolute approach will be provided to address Performance Requirement C1P2 to allow the slab edge to not extend to the external face of the external wall. The provision of fire stopping suitable for a cavity barrier application is to be provided in between the slab edge and external wall at each floor.
- BCA Clause C2D2, C3D9, C3D10 and S5C11 require fire resistant construction to separate classifications in the same storey from one another by elements achieving an FRL of at least (180)/180/180 for retail areas (or the entire storey shall be constructed to achieve this FRL). It is proposed to reduce the FRL for the retail area on the Ground Floor. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P1 and C1P2 to allow for rationalised FRLs to retail areas. The provision of sufficient ventilation and compartment linings will form part of the solution.

² Australian Building Codes Board, "Australian Fire Engineering Guidelines," Australian Building Codes Board, Canberra, 2021.

- BCA Clause C2D2, C3D9, C3D10 and S5C11 require fire resistant construction to separate classifications in the same storey from one another by elements achieving an FRL of at least (240)/240/240 for Class 7b areas (or the entire storey shall be constructed to achieve this FRL). It is proposed to rationalise the FRL for Class 7b area on the First Floor. A Performance Solution using a comparative approach will be provided to address Performance Requirements C1P1 and C1P2 to allow for rationalised FRLs. The fire separation of Class 7b areas will be relied upon as part of the solution.
- BCA Clause C4D3 and C4D5 require openings in external walls that are located within 3 m of an allotment boundary or 6 m of the far side of a road, to be protected in accordance with Clause C4D5. It is proposed to allow some unprotected openings within 3 m of the northern allotment boundary on the First Floor to the Sixth Floor, and the Southern allotment boundary on the Fourth to Thirty Fifth Floor. Note that in some locations Deemed-to-Satisfy protection may be required. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P2 and C1P8 to allow for the unprotected openings. The provision of fixed toughened glazing or radiant heat screen protection may be relied upon as part of the solution. Deemed-to-Satisfy compliant protection may be required in some locations.
- BCA Clause C4D12(6) requires other openings in internal walls which are required to have an FRL with respect to integrity and insulation must not reduce the fire-resisting performance of the wall. It is proposed to allow the opening in the internal wall between the mailroom and residential lobby on the Ground Floor to not achieve an FRL. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P2 and C1P8 to allow for the opening not achieving an FRL. The ancillary nature of the small mail room, proximity to the road or open space and low occupant load within the lobby will be relied upon as part of the solution.
- BCA Clause D2D3(1) requires a building that is more than 25 m in effective height to be provided with two exits from each storey. It is proposed to have a single exit from the Basement 1 carpark exhaust fan room and grease arrestor room, as well as from the substation and plant room on the Ground Floor. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P4 to allow for a single exit within these areas. The provision of storage restrictions, fire separation, low occupancy loads, occupant characteristics, and use of the space within the rooms will be relied upon as part of the solution.
- BCA Clause D2D3(7) requires access to an exit to be provided without passing another Sole-Occupancy-Unit (SOU). It is proposed to allow egress from Level 2 plantrooms to be through the commercial tenancy. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P4 to allow for egress via the office SOU from the plant room. The low occupant loads, intermittent occupancy expected within the plant room, and maintaining an egress route during use will be considered as part of the solution.
- BCA Clause D2D5(3) requires travel distances from any point on a floor in Class 5, 6, 7, 8 or 9 buildings to be no more than 20 m from a single exit and no more than 20 m to a point of choice of exits. It is proposed to allow the following travel distances within the building;
 - Up to 23 m to a point of choice of exits on Basement level 1, and up to 21 on Basement levels 3 to 9
 - Up to 29 m to a single exit that is open space from the Substation on the Ground Floor;
 - Up to 24 m to a point of choice from the main switch room on the Ground Floor.

- Up to 23 m to a point of choice from the commercial tenancy on Level 2. Note changes to internal fitout design will require reassessment by a Fire Engineer.
- Up to 22 m to a point of choice from the gym and pilates studio on Level 3.

A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P4 and E2P2 to allow increased distance to a single exit and point of choice. Reduced occupant loads and prohibition of storage or combustibles, as well as reduced smoke detector spacing to some areas will be relied upon as part of the Performance Solution.

- BCA Clause D2D5(1) requires travel distances from any point on a floor in Class 2 and 3 buildings to be no more than 6 m from an entrance doorway of an SOU to an exit or point of choice of exits. It is proposed to allow the following travel distances;
 - Up to 12 m from an entrance doorway of an SOU to a point of choice of exits on levels 4-6.
 - Up to 11 m from an entrance doorway of an SOU to a point of choice of exits on levels 7-35.

A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P4 and E2P2 to allow for increased travel distances. The provision of smoke seals to SOU doors and reduced smoke detector spacing within corridors may form part of the solution. Additionally, natural ventilation of the corridor may be required as part of this solution.

- BCA Clause D2D6 requires alternative exits to be located no less than 9 m apart. It is proposed to have a distance of 4.5 m between exits from the Level 2 fan room and 8 m between the scissor stair exits on Level 2. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P4 and E2P2 to allow for reduced distance between exits. The prohibition of storage or combustibles within the corridor and smoke seals to rooms opening into the corridor will be relied upon as part of this solution.
- BCA Clause D2D8 requires the unobstructed width along the path of travel to an exit must not be less than 1 m. It is proposed to potentially have less than 1 m (approximately 0.75 m) of unobstructed clear width along a path of travel from the carpark storage boxes on Basement Levels 2-9. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P6. The use of anthropomorphic data will be relied upon as part of this solution.
- BCA Clause D2D12 requires fire-isolated stairs to provide independent egress from each storey served and discharge directly or by way of its own fire-isolated passageway to open space or a covered area satisfying particular criteria. It also requires protection of openings that are within 6 m of the path of travel. It is proposed to have the eastern fire isolated stair from the basement to discharge to a space, within the confines of the building that is not open for 2/3 of its perimeter and then pass within 6 m of unprotected openings along the external wall of the building. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P5 and E2P2 to allow for the discharge to a covered area. The prohibition of storage or combustible items within the discharge area and the prohibition of downturn at the slab edge as well as egress in two directions being available will be relied upon as part of the solution.
- BCA Clause D2D14(5) requires travel from a non-isolated stair to be up to 20 m from a doorway providing egress to a road or open space or from a fire-isolated passageway leading to a road or open space. On Level 1, it is proposed to allow a travel distance of 26 m to a doorway providing egress to an open space. A Performance Solution using a comparative approach will be provided to

address Performance Requirement D1P4 to allow discharge of the non-fire-isolated stair. The two paths of egress from the loading dock will be considered as part of the solution.

- BCA Clause D2D15(4) requires the discharge point of alternative exits to be located as far apart as practical. It is proposed to have the two fire-isolated stairs serving the residential levels discharge adjacent to one another on the Ground Floor. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P5 to allow for alternate exits discharging in proximity to one another. The discharge point being open space with limited combustibles will be relied upon as part of the solution.
- BCA Clause D3D13 requires an exit discharging along the roof of a portion of the building to have an FRL of not less than 120/120/120 and not have any openings within 3 m of the path of travel to the road. It is proposed to have Ground Floor exits discharge onto the roof of the carpark which will likely have services openings within 3 m of the path of travel. A Performance Solution using an absolute approach will be provided to address Performance Requirement D1P4. The provision of protection to service penetrations and location of openings will be relied upon as part of the solution.
- BCA Clause D3D25(1)(b) requires doors in a required exit or forming part of a required exit to swing in the direction of egress. It is proposed to allow the required exit door from the smoke lobby and the exit adjacent to the lift/mailroom on the Ground Floor to swing against the direction of egress. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P2 to allow for the door swing against the direction of egress. The low occupant loads and intermittent occupant use will be relied upon as part of the solution.
- BCA Clause E1D2 requires a fire hydrant system to be installed in accordance with AS 2419.1-2021 which requires that the fire brigade booster connection be located within sight of the principal pedestrian entrance of the building. The fire hydrant booster is proposed to be located adjacent to Alfred Street, which is not within sight of the main entrance located next to residential lobby. A Performance Solution using an absolute approach will be provided to address Performance Requirements E1P3 to allow for the location of the booster. Signage and a strobe are proposed to be provided for the booster, as part of the solution.
- BCA Clause C3D7, E1D4, E1D5, and S17 requires openings for service installations that pass-through building elements required to have an FRL to be fire stopped to achieve an integrity and insulation rating. It is proposed to have a ring main pass through the slabs of the fire-isolated scissor stairs which are required to have an FRL. A Performance Solution using an absolute approach will be provided to address Performance Requirement E1P4 to allow for these service penetrations. The provision of providing fire protection for penetrations through the slab. Fire-isolated stairs and adjacent structure requiring an FRL, the area being sterile with combustible materials prohibited and the inherent heat transfer associated with the penetration.
- BCA Clause E1D15 and S19C9 requires fire control rooms to be accessible via the front entrance of the building and from a public place or fire-isolated passageway which leads to a public place. It is proposed to have multiple entrances that can be considered the front entrance, therefore, the accessibility of the fire control room is not via both front entrances. A Performance Solution using an absolute approach will be provided to address Performance Requirement E1P6. The provision of signage will be relied upon.

- BCA Clause E1D17 and E2D21 requires suitable additional provisions to be made if special problems for fighting fire arise. It is proposed the design will have Electric Vehicle (EV) Charging stations, a loading dock turntable, Solar PV panels and further EV battery storage within the building. A Special Hazard Assessment will be provided to address these hazards.

3 SUMMARY

Based on Holmes's review of the project documentation, it is considered that performance-based fire engineering can be utilised to demonstrate compliance with the Performance Requirements of the BCA without major changes to the current design. Additional non-compliances may be identified as the design is further developed, however it is considered that there are no significant issues that would affect the building layout.

The information contained within this letter is based on the architectural drawings prepared by Office of Cortese & Gilder as listed below.

Dwg no.	Title	Issue
DA03.001	BASEMENT 1	A
DA03.002	BASEMENT 2	A
DA03.003	BASEMENT 3	A
DA03.004	BASEMENT 4 - BASEMENT 8	A
DA03.009	BASEMENT 9	A
DA03.100	GROUND FLOOR	A
DA03.101	LEVEL 1	A
DA03.102	LEVEL 2	A
DA03.103	LEVEL 3	A
DA03.104	LEVEL 4 - LEVEL 6 (RESIDENTIAL - TYPICAL LOW)	A
DA03.114	LEVEL 7-17, 19-28 (RESIDENTIAL - TYPICAL MID)	A
DA03.118	LEVEL 18 (RESIDENTIAL - PLANT)	A
DA03.129	LEVEL 29-34 (RESIDENTIAL - TYPICAL HIGH)	A
DA03.135	LEVEL 35 (RESIDENTIAL SKY)	A
DA03.136	LEVEL 36 (RESIDENTIAL SKY)	A
DA03.137	LEVEL 37	A
DA03.138	ROOF	A
DA09.001	EXISTING EAST STREET ELEVATION	A
DA09.002	EXISTING SOUTH STREET ELEVATION	A
DA09.101	EAST STREET ELEVATION	A

Dwg no.	Title	Issue
DA09.102	SOUTH STREET ELEVATION	A
DA09.103	WEST STREET ELEVATION	A
DA09.104	NORTH STREET ELEVATION	A
DA09.201	EAST ELEVATION	A
DA09.202	SOUTH ELEVATION	A
DA09.203	WEST ELEVATION	A
DA09.204	NORTH ELEVATION	A
DA09.301	PODIUM EAST ELEVATION	A
DA09.302	PODIUM SOUTH ELEVATION	A
DA09.303	PODIUM WEST ELEVATION	A
DA09.304	PODIUM NORTH ELEVATION	A
DA09.305	TOWER ELEVATIONS	A
DA09.306	TOWER ELEVATIONS	A
DA10.101	BUILDING SECTION A	A
DA10.102	BUILDING SECTION B	A
DA10.103	BUILDING SECTION C	A
DA10.104	BUILDING SECTION D	A
DA10.105	BUILDING SECTION E	A

Please do not hesitate to contact Holmes, should there be any queries about the above.

Regards,



Jared Mattern
Senior Fire Engineer

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