CONSULTANT ADVICE NOTICE

PROJECT:	**164-194 WILLIAM STREET, WOOLLOOMOOLOO – CONCEPT**	**CAN NO:**	**FE002[1.1]**
Date:	**2 September 2025**	**Project No:**	**41532 - 001**
Pages:	**10**		

FIRE ENGINEERING – STATE SIGNIFICANT DEVELOPMENT APPLICATION (DA) STATEMENT

EXECUTIVE SUMMARY

This Fire Engineering DA Statement has been prepared by Norman Disney & Young (NDY) to accompany the proposed State Significant Development Application (SSDA) for a mixed-use infill affordable housing development at 164-172 and 174-194 William Street Woolloomooloo. The site is made up of two (2) lots. The legal description of the site is outlined in Table 1.

TABLE 0-1 – LEGAL DESCRIPTION

PROPERTY ADDRESS	TITLE DESCRIPTION
164-172 William Street, Woolloomooloo	Lot 52 in DP1049805
174-194 William Street, Woolloomooloo	Lot 1 in DP816050

This document has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-80211463).

This report concludes that the proposed development is suitable with respect to non-compliances identified that are proposed to be addressed via Fire Engineering Performance Solutions (per Section 2), to support the design seeking SSDA approval.

Proposed mitigation measures, to be further developed during detailed design, are as outlined within the Fire Engineering Concept Strategy document (prepared by NDY, reference FE001 ca250602s0003, revision 1.2, dated 2 September 2025).

1. INTRODUCTION

1.1. BACKGROUND

Norman Disney & Young (NDY) has been commissioned by William Street Residential Pty Ltd to prepare this report in accordance with the technical requirements of the Secretary's Environmental Assessment Requirements (SEARs), and in support of the State Significant Development Application (SSD-80211463) for the proposed mixed-use infill affordable housing development at 164-172 and 174-194 William Street Woolloomooloo.

Following the Design Excellence Competition, the scheme has been revised to include In-fill Affordable Housing (IAH) in line with the NSW Government's policy under the *State Environmental Planning Policy (Housing) 2021* (*Housing SEPP*). This policy allows for a 30% increase in Floor Space Ratio (FSR) and building height when 15% of the total FSR is provided as affordable housing for 15 years. The proposed development meets these criteria and is eligible for the bonus uplift.

Given the residential component's Capital Investment Value (CIV) exceeds $75 million, an SSDA pathway can be taken. The proposal retains key design principles recommended by the Design Excellence Panel and aims to provide additional residential dwellings with a 30% increase in GFA and building height, in accordance with the Housing SEPP.

The purpose of the project is to facilitate the delivery of a high-quality mixed-use development containing residential and retail uses as well as a centrally located park, public domain improvements and improved through-site connectivity at a strategically located site. The proposal seeks to deliver a built form outcome that responds appropriately to its location on William Street in Woolloomooloo and in close proximity to Kings Cross Station and the Sydney CBD. Furthermore, the proposed scheme seeks to deliver an outcome that is consistent with the desired and evolving character of the Woolloomooloo and Potts Point area.

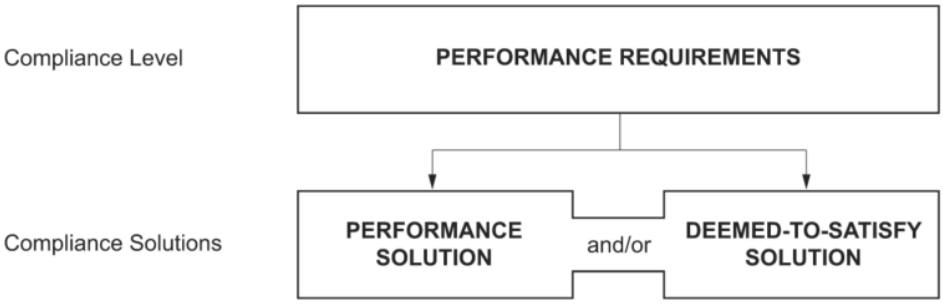
Specifically, this SSDA seeks consent for:

- 227 apartments (167 market housing, 60 affordable housing units
- Ground floor retail and commercial uses with 7 – 18 storeys of residential tower across four buildings being:
    - FJC - William Street (West)
    - FJC - William Street (East)
    - Studio Bright – Forbes Street
    - Tribe Studio – Dowling Street
- A publicly accessible central park
- Public domain works and improved through-site links
- Four basement levels for parking, services and storage
- Vehicular and loading access from Forbes Street

1.2. SCOPE

This Fire Engineering DA statement has been prepared in support of the project's SSDA and to comment on the potential Fire Engineering Performance Solutions required to address fire safety related BCA Deemed-to-Satisfy (DTS) non-compliances associated with the proposed works.

Compliance with the Performance Requirements of the Building Code of Australia 2022 (BCA) Amendment 2 shall be achieved either through design solutions that meet Deemed-to-Satisfy (DTS) prescriptive measures or through fire engineered Performance Solutions, or a combination as outlined with Clause A2G1 of the BCA.



Where departures from the BCA DTS provisions are addressed as Performance Solutions, these will be documented based on methodologies outlined in Clause 2.2.8 of the Australian Fire Engineering Guidelines, in order to demonstrate compliance with the Performance Requirements of the BCA.

1.3. LIMITATIONS

- It is noted that this document provides only an overview of anticipated non-compliances that will require Fire Engineering analysis and is subject to be further developed in subsequent design phases.
- The proposed works for the project will require a detailed BCA assessment in the subsequent design stages in order to confirm the non-compliances required to be addressed by Fire Engineering Performance Solutions.
- The feasibility of undertaking the Performance solutions to addressing each non-compliance identified is subject to our review and assessment, plus referral to relevant authorities (including consultation and approval by Fire and Rescue NSW).

1.4. REFERENCE DOCUMENTS

- Architectural drawings prepared by fjcstudio, 'For Information' issue, dated 24/07/2025 & 01/08/2025.
- BCA Markups prepared by Jensen Hughes, Ref. 119744 Drawings Combined – BCA Markup r2.
- BCA Report prepared by Jensen Hughes, project number 119744, revision 1.0, dated 25 August 2025.

1.5. SITE LOCATION

The site is located at 164-172 and 174-194 William Street Woolloomooloo within the City of Sydney LGA. The site is comprised of multiple allotments and is legally described as:

- 164-172 William Street, Woolloomooloo
  - Lot 52 in DP1049805
- 174-194 William Street, Woolloomooloo
  - Lot 1 in DP816050

The land size totals 6,398 m^2 and consists of a southern frontage to William Street, an eastern frontage to Dowling Street, a western frontage to Forbes Street and northern frontage to Judge Lane.

Refer to the figure below for reference.

FIGURE 1-1 – SITE LOCATION

1.6. SURROUNDING CONTEXT

The immediate urban context surrounding the site is characterised by a mix of medium density residential, commercial, and retail uses. The site is in close proximity to Hyde Park, The Domain, and Rushcutters Bay Reserve. There are a number of educational and health services in proximity to the site, providing ample infrastructure support for the community.

William Street, to which the site fronts, is a classified road providing connection between the Eastern Suburbs of Sydney and the CBD. Vehicle access is currently provided from six points on the site from Judge Lane, Forbes Street, and Dowling Street. Pedestrian access to the site is currently available from all frontages.

The site is highly accessible to both bus and rail services, being approximately 300 m away from Kings Cross Railway Station and having direct access to bus services on William Street that provide connections through the Metropolitan Transport Network.

At the time of lodgement, the site is improved by a warehouse style structure and glass office building to the site's frontage and an at-grade private carpark to the northwestern portion of the site.

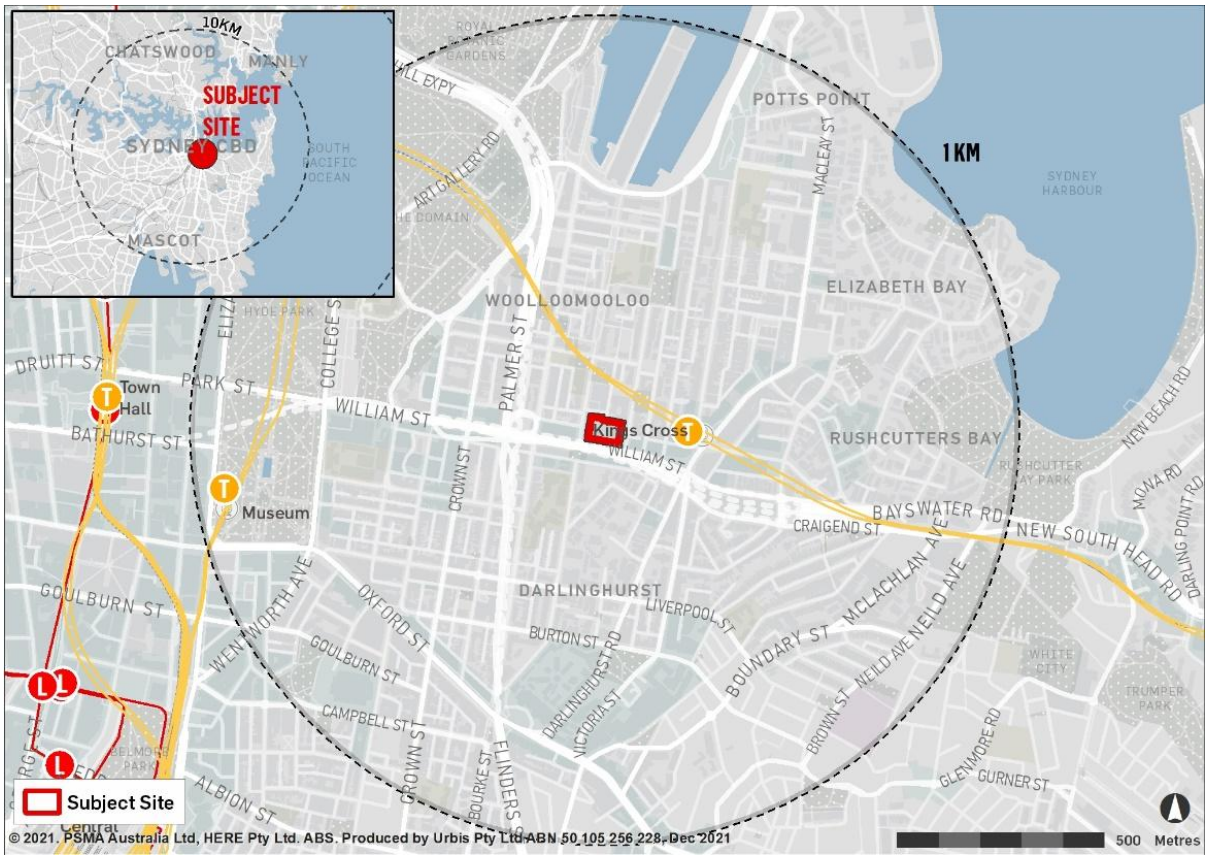


FIGURE 1-2 – LOCAL CONTEXT

1.7. BUILDING ARRANGEMENT

The proposed works relate to three new mixed-use buildings on the site, which will consist of residential Class 2 towers over Class 6 retail, 7a carparking, and 7b storge. The following figures illustrate the Ground floor layout and a typical residential level layout.

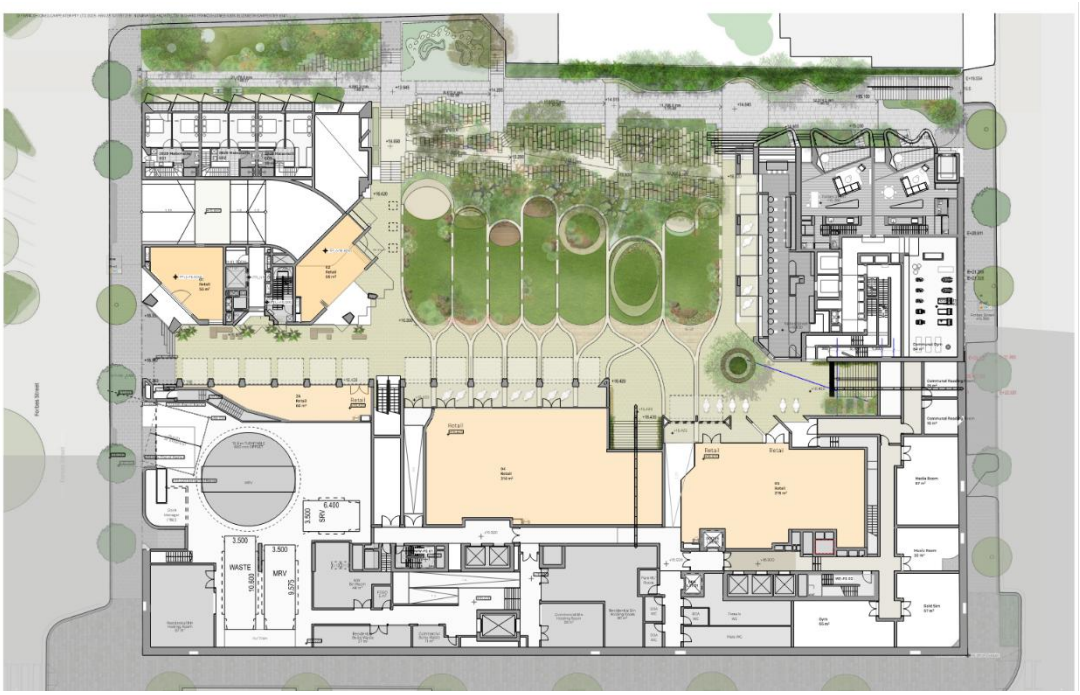


FIGURE 1-3 – GROUND LEVEL

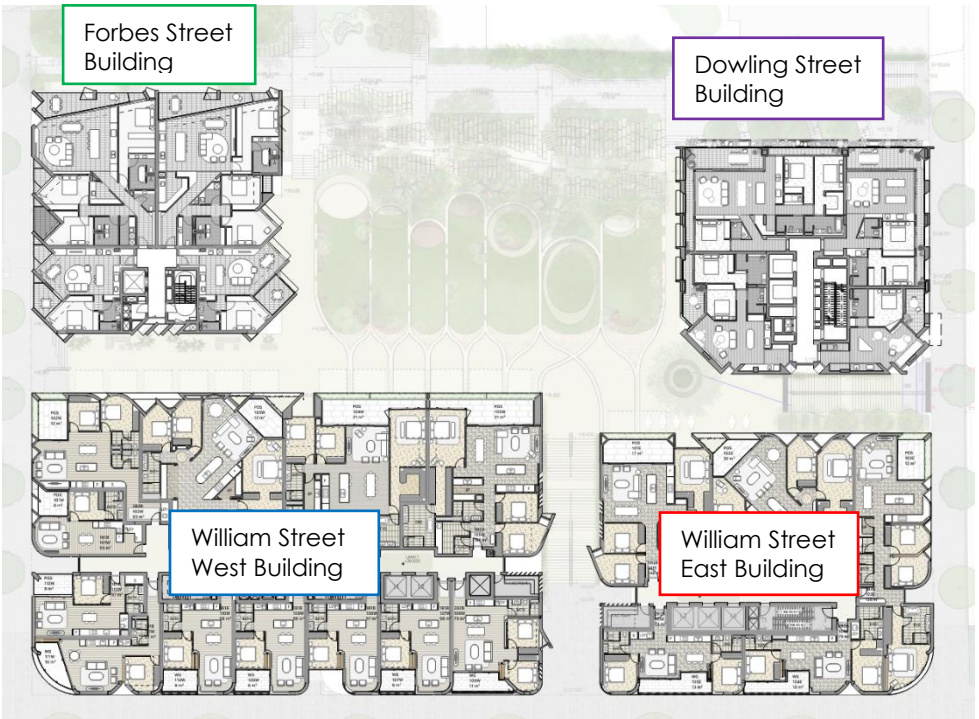


FIGURE 1-4 – TYPICAL FLOOR LEVEL (LEVEL 01-02)

2. SCHEDULE OF PERFORMANCE SOLUTIONS / ASSESSMENTS

A preliminary fire engineering strategy has currently been developed to address a range of departures from the prescriptive Building Code of Australia (BCA) Deemed-to-Satisfy (DTS) provisions by way of Performance Solutions.

Based on the BCA Report (prepared by Jensen Hughes), in addition to markups provided and consultation with the design team, the anticipated Performance Solutions are as summarised in the following table:

#	BCA DTS CLAUSE	DESCRIPTION OF NON-COMPLIANCES
1.	C2D2, Spec. 5	To permit FRLs of Class 6 portions to be reduced to 120-min FRL, in lieu of achieving 180-min FRL. *Note that this is subject to sufficient ventilation being achieved for the retail units.*
2.	C2D2, Spec. 5, C3D9, C3D10	To permit FRLs of Class 7b portions to be reduced to 120-min FRL (in lieu of 240-min FRL) and specific areas to not require fire separation, within the following areas: • Basement Levels 02-04 • Retail Laneway level
3.	C3D15	To permit Class 2 public lobby spaces to exceed 40m in length to the following areas of the William Street building: • Mezzanine-Level 3 – 50 m length in lieu of 40 m Levels 4-7 – 45 m length in lieu of 40 m
4.	C4D14, S5C8	• To permit the bin rooms to form the base of the waste shafts.
5.	S5C16	To permit the following departures relating to the roof lights of both the William Street East & West building: • Roof lights occupy more than 20% of the roof area. • Roof lights are within 3 m of a part of the building which projects above the roof that does not have an FRL. • An adjoining SOU roof light where the bounding walls are required to be fire rated. • A roof light within an adjoining fire separated section of the building.
6.	D2D3	To permit a single exit in lieu of two exits to the following: • Fire pump room • Throughout the Forbes Street building • Ground Level residential lobby, within the William Street East building
7.	D2D5	To permit the following extended travel distances: • <u>All Residential Levels</u> – Up to 12 m from a SOU door to the nearest exit in lieu of 6 m. • <u>All Basement Levels</u> – Up to 30 m to a point of choice in lieu of 20 m. – Up to 50 m to the nearest exit in lieu of 40 m. • <u>Ground Plaza Level</u> – Up to 30 m to a point of choice in lieu of 20 m, from Class 6 & 7b / 8 areas. – Up to 25 m to a single exit, in lieu of 20 m from the Dowling St Building communal room. • <u>William Street West Building</u> – Residential Lobby on the Upper Ground Floor – Up to 25 m to a point of choice in lieu of 20 m. • <u>Forbes Street building</u>

#	BCA DTS CLAUSE	DESCRIPTION OF NON-COMPLIANCES
		• Up to 17m from SOU doors on the Judge Lane level to the nearest exit in lieu of 6m.

8.	D2D6	To permit the following distances between alternate exits:
		• <u>All Basement Levels</u>
		  – Up to 70 m in lieu of 60 m.
		• <u>Retail Laneway Level</u>
		  – Up to 50 m in lieu of 45 m.
		• <u>Ground Plaza Level</u>
		  – Up to 90 m, in lieu of 45 m (for Class 2 areas) and 60 m (for Class 6, 7 & 8 areas).

9.	D2D6	To permit distances between alternative exits measure: • <u>William Street East fire stair exits, residential levels</u> – minimum of 7.5 m, in lieu of minimum 9 m. • <u>Dowling Street fire stair exit, Plaza Level</u> – minimum of 5.8 m, in lieu of minimum 9 m.
10.	D2D12	The discharge of fire-isolated exits are subject to the following departures: • Discharges into a shared corridor, in lieu of being provided with independent egress. • The shared corridor discharges into an area that is not open for 1/3 of its perimeter, and has an unobstructed height of less than 3m. • The shared corridor discharges at a point located at 24 m in lieu of 6 m to a road or open space
11.	D2D12	The discharge route from Stair 01 requires passing by 6m of an external wall containing unprotected glazed openings (note however the external wall achieves 60/60/60 FRL as required).
12.	D2D14	To permit the non-fire-isolated stair within the William Street West building (providing access from Level 8 up to the communal terrace space on Level 9) to not be provided with a continuous means of travel by its own flights and landings from every storey served.
13.	D2D15	To permit the Dowling Street Building alternative exits to discharge adjacent to each other, in lieu of as far as apart as practical.
14.	D3D5	To permit the following stairs to contain rising and descending stairs to have smoke separation that is not considered to meet the DTS provsions: • Forbes Street building – Fire Stair 01 • Dowling Street building – Fire Stair • William Street building west, Retail Laneway level – WW-LD-01 & WW-FS 01
15.	D3D13	Exits discharge to the podium roof and egress routes pass within 3m of openings for services and drainage.
16.	D3D25	To permit the fire exit entry door from the Forbes Street lobby on Ground Level to swing against direction of egress. *Note that this door may not be required, subject to egress being provided via the main entry from the lobby to the plaza.*
17.	E1D3	To omit fire hose reel coverage to the garbage / bin rooms enclosed in fire-rated construction and forming the base of the garbage shaft.

#	BCA DTS CLAUSE	DESCRIPTION OF NON-COMPLIANCES
18.	E1D15, S19C4	To permit the fire control room to not be accessible from the front entrance of the building.
19.	E1D15, S19C9	To permit the fire control room to involve a change in level of more than 300 mm.
20.	E1D2	To permit the fire hydrant booster to be located in an area not within sight of the main entry into the building.
21.	E2D4	To permit the Forbes Street building fire stair exit to be provided with stair pressurisation to storeys serving only the basement levels, in lieu of being provided to throughout the entire stair.
22.	E2D6	To permit the omission of zone pressurisation to Class 6, 7b and 8 portions of the building, located on the following levels: • Basement Levels • Plaza Level • Retail Laneway Level • Upper Ground Floor Level • Mezzanine
23.	E3D5	Emergency lifts are required in all lift shafts in a building with an effective height >25 m. It is proposed for private penthouse lifts to not be emergency lifts.

TABLE 2-1 – SUMMARY OF PROPOSED PERFORMANCE SOLUTIONS

In addition to above, a number of items are proposed to be addressed as a Special Hazard via a Fire Engineering Risk Assessment. These include:

#	BCA DTS CLAUSE	DESCRIPTION OF ASSESSMENT REQUIRED
24.	E1D17 / E2D21	Provision of EV chargers within the basement carpark shall be undertaken as a Special Fire Hazard Assessment.
25.	E1D17 / E2D21	E-bikes and solar panels

TABLE 2-2 – SUMMARY OF PROPOSED SPECIAL FIRE HAZARD ASSESSMENTS

3. FIRE ENGINEERING PROCESS

The fire engineering process that is being undertaken is as follows, in accordance with the Australian Fire Engineering Guidelines (AFEG) which is endorsed by the Australian Building Codes Board (ABCB):

- Concept Review and Strategy Development (this stage)
- Performance-Based Design Brief (PBDB) / Fire Engineering Brief Questionnaire (FEBQ) consultation process, including consultation with Fire & Rescue NSW and submission of FEBQ (to be undertaken in subsequent stages)
- Fire Engineering Report (to be undertaken in subsequent stages)
- In Construction – Fire Engineering Inspection Reports (to be undertaken post construction prior to the issuing of any Occupation Certificates).

4.CONCLUSION/NEXT STEPS

Based on the works undertaken to date in consultation with the design team, the proposed works at 164-194 William Street, Woolloomooloo is capable of complying with the Performance Requirements of the BCA. This will be achieved through a combination of meeting prescriptive DTS provisions and through fire engineering Performance Solutions.

Note that the following are outstanding items to be resolved during the following detailed design stage of the project:

- An additional Performance Solution is currently being explored, to permit service penetrations through fire-rated elements within Class 7b / 8 Loading Dock areas on the Plaza Level to achieve 120-min FRL, in lieu of maintaining the structure's 240-min FRL. This is due to there being limited suitable protection systems available.
  This item shall be resolved during the following stages of the project, where it shall be subject to the structure to Class 7b / 8 Loading Dock on the Plaza Level achieving 240-min FRL and each service penetration proposed shall each be reviewed individually.

A Fire Engineering process is currently being undertaken in accordance with the Australian Fire Engineering Guidelines. Next steps include finalising the non-compliances required to be addressed by Fire Engineering solutions, to be documented within a finalised Concept Fire Engineering Strategy Report, followed by a Fire Engineering Brief Questionnaire (FEBQ) for referral to FRNSW and Fire Engineering Report (FER) during the subsequent detailed design stages of the project.

NDY, A Tetra Tech Company

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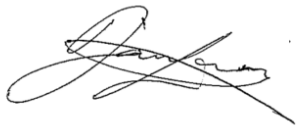

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