



18 December 2025

Kiersten Fishburn

Secretary

NSW Department of Planning, Housing and Infrastructure

4 Parramatta Square, 12 Darcy Street Parramatta NSW 2150

Dear Kiersten

State Significant Development Application (SSD-80059960) – Response to Submission Letter 2 Fitzwilliam Street, Parramatta

This letter is submitted to the Department of Planning, Housing and Infrastructure (DPHI) on behalf of the Applicant, UPG Fitzwilliam Pty Ltd (UPG) in response to comments issued in the exhibition period of the SSDA. The comments relating to Sustainability are listed below as well as a response from the project team

DPHI Comments

Environmental Performance

- Condition C19 of the concept consent requires specific minimum environmental standards to be met in the proposal, such as in relation to Green Star rating. The Applicant responds that: ‘...the proposed development achieves a high level of sustainability’ and ‘The minimum environmental standards stipulated in this condition were provided in the context of a commercial office development, opposed to a hotel proposal’. Provide further information to demonstrate that the proposal will achieve these minimum requirements of the concept consent.

Parramatta Local Environmental Plan 2012 (PLEP 2012):

- Provide further consideration and information in response to the following PLEP 2012 clauses:
 - Clause 7.25 High performing building design (as the development involves uses to which this clause applies). This should also be addressed in the ESD Report (Appendix CC to the EIS).

Project team response

Environmental Performance

A Green Star rating was proposed when the project was originally planning to be a commercial development. Now that the project is a hotel and build to rent (BTR) the sustainability goals have changed to better align with best practice sustainability targets for the different building classes.

- Commitment for the hotel component a NABERS energy and water rating
- Commitment for the BTR component a WELL for Residential rating



Parramatta Local Environmental Plan 2012 (PLEP 2012):

Section 2.3.1 of the ESD report (Rev 04 dated 19/03/2025) states that the project is no longer targeting clause 7.25 High performance building design. It notes that the high-performance building design requirement was targeted through the design competition, however, the BASIX targets increased from 25 points to 63 points, after the competition design had been finalised. This has meant it was not feasible for this project to achieve an increase on the current BASIX targets. As the design was based off achieving 25 points + 10 points not 63 + points.

Updated ESD Strategy

The proposed sustainability elements include (items in bold and underlined below are additional sustainability initiatives the project is committing to):

- Commitment to a 4-Star NABERS Energy Rating, as per the NSW Sustainable Buildings SEPP, for the hotel portion of the building.
- Commitment to a 3-Star NABERS Water Rating, as per the NSW Sustainable Buildings SEPP, for the hotel portion of the building.
- **WELL for Residential for the BTR component of the building**
- Address the ESD principles detailed in the Secretary's Environmental Assessment Requirements (SEARs).
- Meet BASIX minimum compliance Energy and Water targets.
- Gas use on-site restricted to the Hotel kitchen until 2035 then eliminated, to reduce fossil fuel reliance.
- Significant on-site energy generation through a major solar PV array, reducing operational energy and GHG emissions associated with the site.
- 90% waste diversion from landfill target during demolition and construction
- Providing **10% of** parking capacity for electric vehicles to prepare for a decarbonised future.
- Urban heat island effect mitigation strategies.
- Following a range of sustainability initiatives across the site spanning energy efficiency, thermal performance, indoor environment quality, waste management, and comfort.

Authorised by:

Engineering Lab NSW Pty Ltd

Chris Mann | Associate

Sustainability