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CONSULTANT ADVICE LETTER

PROJECT NAME:	Novus on Victoria
PROJECT NUMBER:	240482
ATTENTION:	Charles Maxwell
FROM:	Laura Golembowski
DOCUMENT:	Green Star Advice Letter

Re: Green Star Pathway

This Consultant Advice Letter has been prepared by JHA ESD to advise on Council's RTS requesting a minimum 6-star Green Star rating for the shop-top housing development located at 410-416 Victoria Ave Chatswood NSW 2067.

ESD Planning Requirements

Sustainable Building Design for residential projects is regulated by the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) and the State Environmental Planning Policy (Sustainable Buildings) 2022 (Sustainable Buildings SEPP) including BASIX. For residential development in NSW, the standards set out in the Sustainable Buildings SEPP prevail all other environmental planning instruments.

Therefore, the sustainability design for this development, as submitted with the State Significant Development Application (SSD-63324208), has been in accordance with the EP&A Regulation and Sustainable Buildings SEPP by addressing Item 15 of the SEARs issued by DPHI on 4 February 2025. The development has been designed towards the ESD principles (as defined in section 193 of the EP&A Regulation) and the Sustainable Buildings SEPP 2022. Neither of these planning requirements require a Green Star certification for the project. However, the project adopted a target of a 5-star Green Star Buildings v1 rating within its design committing to further sustainability standards.

Higher Building Sustainability Standards

The project team supports council's request for higher building sustainability standards by committing to a Green Star rating. At the time of the design development prior to the State Significant Development Application (SSD-63324208), the Willoughby Development Control Plan 2023 (WDCP 2023) required the development to meet a 4-star Green Star rating. The project's target of a 5-star Green Star rating represented 'Australian excellence' and a higher sustainability

standard than required. As of the amendments to WDCP 2023 effective since 9 July 2025, Council seeks a 6-star Green Star rating for projects within E2 Commercial Centre Zone.

Implications

The implications for a redesign from 5-star Green Star to a 6-star Green Star under Buildings v1 are major as an additional 35 points to the minimum 35 points would need to be targeted (see Figure 1).

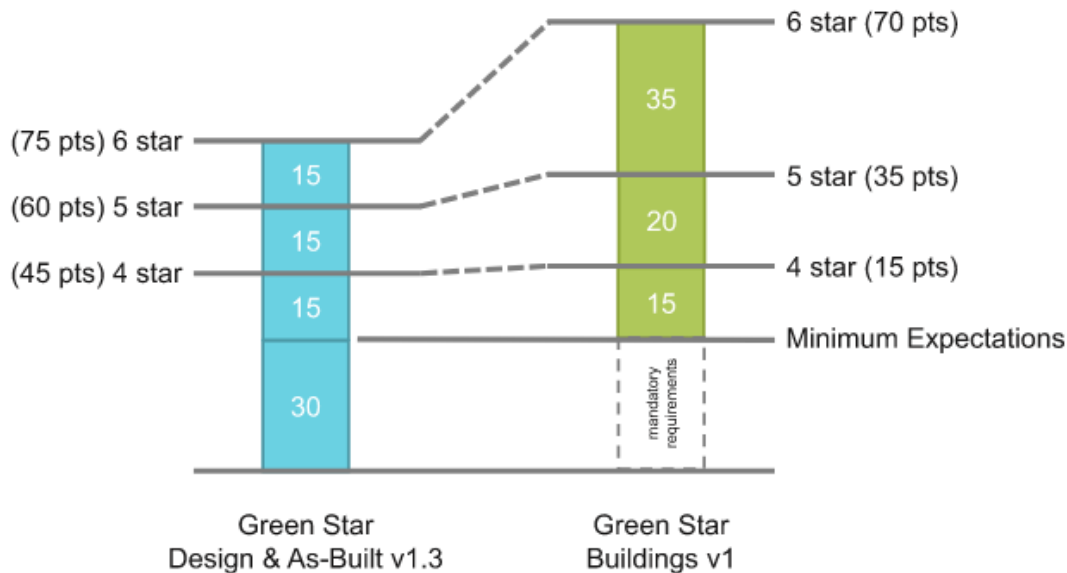


Figure 1: Comparison of Star ratings within Green Star DAB v1.3 and Buildings v1

In addition to meeting these additional points for a 6-star Green Star certification under Buildings v1, projects are required to eliminate or offset all remaining carbon emissions for a 6-star Green Star rating.

However, given the small building footprints typically seen for projects located within urbanised CBD locations, the ability to target a 6-star rating is generally limited and, in many cases, unviable due to:

- Limited roof space for renewable energy allocation and rainwater capture to enable implementation of rainwater harvesting.
- Limited land available for deep soil landscaping or biodiversity enhancement.
- Limited passive design potential due to lift & services core associated with a small footprint high-rise building.
- High-rise buildings inherently have higher embodied carbon due to concrete and steel use, whereas smaller projects allow for modular or low-carbon construction methods.

Green Star Pathway

Based on the limitations above, the project team designed the development towards a 5-star Green Star rating. This pathway is the most suitable for the project.

This decision is further supported by the following:

- The ever-increasing minimum standards within the Green Star rating tools provide a high benchmark to achieve a 5-star rating, particularly compared to 5-star ratings achieved under previous rating tools (see Figure 1).
- Although the E2 Commercial Zone proposes a 6-star rating requirement, the application of the rating tool to a Commercial Building is not comparable to a Residential Building.
This seems to be reflected within the amended WDCP 2023, which only requires a 5-star rating for projects within the MU1 Mixed Use Zone or in general for residential flat buildings and developments with an estimated cost over \$30 million.

3. 6-star Green Star ratings are predominantly targeted for Commercial Buildings and it is very rare for a Residential Building to target a 6-star rating. To date there have been very few residential 6-star Green Star certified projects.
4. We welcome and support the request for higher building sustainability standards and propose a 5-star Green Star rating for this particular project, which represents 'Australian excellence' and will result in, i.e., high indoor environmental quality, climate change resilient design, low carbon development, energy and water efficient performance, and sustainable transport solutions.

Project Recommendations

In conclusion, a 5-star ('Australian excellence') Green Star rating as targeted for this project is a high building sustainability standard and recommended as the appropriate rating tool for the shop-top housing development located at 410-416 Victoria Ave Chatswood NSW 2067.

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Yours sincerely,



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Sustainability Engineer