INNOVA SERVICES AUSTRALIA
ABN 94 639 882 465

10 October 2025
Our Ref: 25416-L01-03

**Homebush Developments No. 1 Pty Ltd**
30a Eva Street
Riverwood NSW 2210

**Attention:** **Claudine Malanum**
Email: claudine@level33.com.au

**Dear Claudine**

# MIXED-USE DEVELOPMENT – 17-24 LOFTUS CRESCENT, HOMEBUSH FIRE ENGINEERING STATEMENT (FOR SSDA and REZONING SUBMISSION)

## INTRODUCTION

This Fire Engineering Statement has prepared by Innova Services Australia Pty Ltd on behalf of Homebush Developments No.1 Pty Ltd ('the Applicant') in support of a concurrent Rezoning Proposal and State Significant Development Application (Rezoning and SSDA) for a mixed-use development for the site at 17-24 Loftus Crescent, Homebush (the site).

This SSDA seeks approval for:

- Demolition of existing structures on the site, tree removal and site excavation for basement levels.
- Construction of a new mixed-use development consisting of:
- Ground floor retail premises consisting of 1,193 sqm of GFA.
- Two residential towers, ranging from 27-35 storeys and comprising a total of 318 apartments including:
    - Approx. 306 market apartments;
    - Approx. 12 affordable apartments;
    - Residential lobbies and a podium; and
    - Communal open space.
- Car and bicycle parking for residents, workers and visitors across two (2) basement level and levels 1 to 3 including:
    - 352 car parking spaces, inclusive of 48 accessible spaces;
    - Garbage storage.
    - Plant rooms and other associated services.
- Public domain upgrades to Loftus Lane, including road widening and the provision of a site through link from Loftus Crescent through to Loftus Lane.
- Associated landscaping and public domain works.

The concurrent Rezoning seeks the following amendments to the *Strathfield Local Environmental Plan 2012* (SLEP 2012) to facilitate the proposed development:

- Amend the Height of Buildings Map under Clause 4.3 to increase the building height from 75m to 90m and 116m; and
- Amend the Maximum Floor Space Ratio Map under Clause 4.4 to change the maximum Floorspace Ratio (FSR) from 3.6:1 to 7.81:1.

For a further detailed project description, please refer to the Environmental Impact Statement and Rezoning Report prepared by Ethos Urban.

This report should be read in conjunction with the Rezoning Request and Environmental Impact Statement prepared by Ethos Urban, the Architectural Plans prepared by DKO Architects, and the other accompanying technical documents that form part of the State Significant Development Application.

## SITE DESCRIPTION

The site is situated at 17-24 Loftus Crescent, Homebush, approximately 14.6km west of the Sydney CBD and within the Stratfield Local Government Area (LGA). It is strategically located within the Homebush Precinct being approximately 250m from Homebush Train Station which provides services to Parramatta, Penrith, Leppington and the Sydney CBD. It is within proximity to the local retail shopping strip along Parramatta Road Corridor, two (2) schools including Homebush Public School and Homebush Boys High School and multiple areas of public open space including Augustus Loftus Reserve, Ismay Reserve and Crane Street Park.

The site consists of the following parcels of land and is legally described in Table 1.

**Table 1: Site Description**

| Legal Description | Address |
|---|---|
| Lots A DP 405742 | 17 Loftus Crescent |
| Lot 14 DP 9154 | 18 Loftus Crescent |
| Lot 15 DP 9154 | 19 Loftus Crescent |
| Lot 16 DP 9154 | 20 Loftus Crescent |
| Lot 17 DP 9154 | 21 Loftus Crescent |
| Lot 18 DP 9154 | 22 Loftus Crescent |
| Lot 19 DP 9154 | 23 Loftus Crescent |
| Lot 20 DP 9154 | 24 Loftus Crescent |

The land is wholly owned by Homebush Developments No.1 Pty Ltd. The site is irregularly shaped with an area of approximately 3,980m$^2$, with frontages to Loftus Crescent, Subway Lane and Loftus Lane. Additionally, the site is significantly underutilised being currently occupied by seven (7) detached dwellings and one empty lot

An aerial of the site is provided in Figure 1.

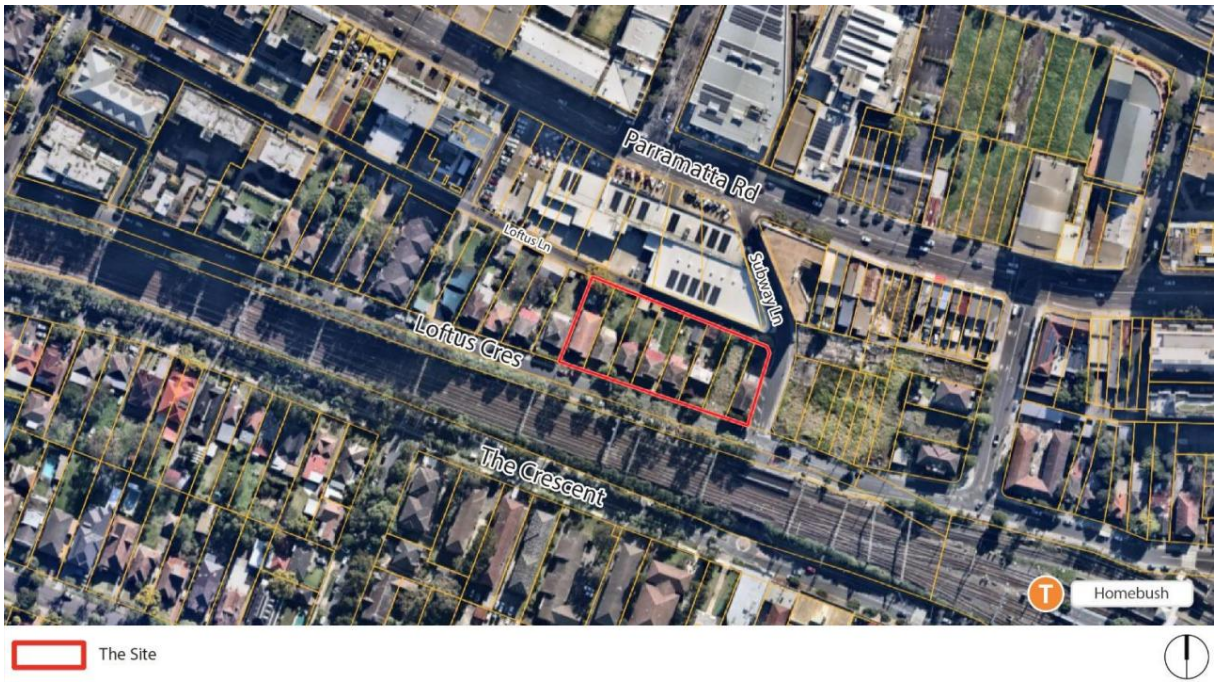


**Figure 1: Site Aerial (highlighted in red)**

Source: Nearmap and Ethos Urban

## NCC ASSESSMENT DATA

With reference to the BCA Assessment Report prepared for the development by Nest Consulting Group (Ref: 25071.2-BCA, Issue No. 2, dated 24 September 2025), the relevant NCC Assessment Data for the subject development is summarised in Table 2.

**Table 2: Relevant NCC Assessment Data**

| NCC Reference | NCC Assessment |
|---|---|
| Classification | Class 2 (residential units)<br>Class 6 (retail)<br>Class 7a (car parking)<br>Class 7b (storage)<br>Class 10b (swimming pool) |
| Rise in Storeys | 35 |
| No. of Levels Contained | 37 |
| Minimum Type of Construction Required | Type A |
| Effective Height | Greater than 50 m (~110 m) |
| Maximum Fire Compartment Size | As applicable for Type A construction |

# REFERENCED DRAWINGS

**Table 3: List of Referenced Architectural Drawings**

| Drawing No. | Issue | Title | Date |
|---|---|---|---|
| DA000 | B | Cover Page | 07-10-2025 |
| DA101 | B | Site Analysis Plan | 07-10-2025 |
| DA200 | B | Basement 2 Plan | 07-10-2025 |
| DA201 | B | Basement 1 Plan | 07-10-2025 |
| DA202 | B | Ground Floor Plan (Podium – Retail) | 07-10-2025 |
| DA203 | B | Level 1 Plan (Podium – Parking) | 07-10-2025 |
| DA204 | B | Level 2 Plan (Podium – Parking) | 07-10-2025 |
| DA205 | B | Level 3 Plan (Podium – Parking) | 07-10-2025 |
| DA206 | B | Level 4 Plan | 07-10-2025 |
| DA207 | B | Level 5-20 Plan | 07-10-2025 |
| DA208 | B | Level 21-22 Plan | 07-10-2025 |
| DA209 | B | Level 23-25 Plan | 07-10-2025 |
| DA210 | B | Level 26 Plan | 07-10-2025 |
| DA211 | B | Level 17-32 Plan | 07-10-2025 |
| DA212 | B | Level 33-34 Plan | 07-10-2025 |
| DA213 | B | Roof Plan | 07-10-2025 |
| DA300 | B | North Elevations | 07-10-2025 |
| DA301 | B | East Elevations | 07-10-2025 |
| DA302 | B | South Elevations | 07-10-2025 |
| DA303 | B | West Elevations | 07-10-2025 |
| DA304 | B | Section AA | 07-10-2025 |
| DA305 | B | Street Perspective | 07-10-2025 |
| DA306 | B | Street Perspective | 07-10-2025 |
| DA307 | B | Street Perspective | 07-10-2025 |

## ACHIEVING COMPLIANCE WITH THE NCC

Compliance with the NCC is achieved by satisfying the Performance Requirements. Clause A2G1(2) of the NCC states that the Performance Requirements can be satisfied by one of the following:

*(a) Performance Solution.*

*(b) Deemed-to-Satisfy Solution.*

*(c) A combination of (a) and (b).*

Clause A2G2(1) of the NCC states that a Performance Solution is achieved by demonstrating:

*(a) compliance with all relevant Performance Requirements; or*

*(b) the solution is at least equivalent to the Deemed-to-Satisfy Provisions.*

Clause A2G2(2) of the NCC states that a Performance Solution must be shown to comply with the relevant Performance Requirements through one or a combination of the following Assessment Methods:

*(a) Evidence of suitability in accordance with Part A5 that shows the use of a material, product, plumbing and drainage product, form of construction or design meets the relevant Performance Requirements.*

*(b) A Verification Method including the following -*

*(i) the Verification Methods in the NCC.*

*(ii) Other Verification Methods, accepted by the appropriate authority that show compliance with the relevant Performance Requirements.*

*(c) Expert judgment.*

*(d) Comparison with the Deemed-to-Satisfy Provisions.*

Clause A2G2(3) of the NCC states Where a Performance Requirement is satisfied entirely by a Performance Solution, in order to comply with (1) the following method must be used to determine the Performance Requirement or Performance Requirements:

*(a) Identify the relevant Performance Requirements from the Section or Part to which the Performance Solution applies.*

*(b) Identify Performance Requirements from other Sections or Parts that are relevant to any aspects of the Performance Solution proposed or that are affected by the application of the Performance Solution.*

Clause A2G2(4) of the NCC states Where a Performance Solution is proposed to be satisfied by a Performance Solution, the following steps must be undertaken:

*(a) Prepare a performance-based design brief in consultation with relevant stakeholders.*

*(b) Carry out analysis, using one or more of the Assessment Methods listed in (2), as proposed by the performance-based design brief.*

*(c) Evaluate results from (b) against the acceptance criteria in the performance-based design brief.*

*(d) Prepare a final report that includes-*

*(i) All Performance Requirements and/or Deemed-to-Satisfy Provisions identified through A2G2(3) or A2.4(3) as applicable; and*

*(ii) Identification of all Assessment Methods used; and*

*(iii) Details of step (a) to (c); and*

*(iv) Confirmation that the Performance Requirement has been met; and*

*(v) Details of conditions or limitations, if any exist regarding the Performance Solution.*

## IDENTIFIED DEPARTURES TO DTS PROVISIONS OF NCC

With reference to the BCA Assessment Report prepared for the development by Nest Consulting Group (Ref: 25071.2-BCA, Issue No. 2, dated 24 September 2025), it is likely that Performance Solutions are proposed to be developed to address departures to the following DtS provisions of the NCC:

1. *Enclosure of shafts (omission of fire rating to base of garbage chute shafts) – NCC Clause C2D2, NCC Specification 5 (S5C8)*
2. *Protection of openings in external walls (exposure to side boundary) – NCC Clauses C4D3, C4D5*
3. *Number of exits required (single exit from fire pump room and cold water pump room on basement 1) – NCC Clause D2D3*
4. *Number of exits required (single exit from lobby 2 on ground floor) – NCC Clause D2D3*
5. *Exit travel distances (basement levels) – NCC Clause D2D5*
6. *Exit travel distance (ground floor lobby) – NCC Clause D2D5*
7. *Exit travel distances (levels 1 to 3) – NCC Clause D2D5*
8. *Exit travel distances (level 4 communal open space) – NCC Clause D2D5*
9. *Exit travel distances (level 4 residential units) – NCC Clause D2D5*
10. *Exit travel distances (levels 5 to 34) – NCC Clause D2D5*
11. *Distance between alternative exits (basement levels) – NCC Clause D2D6*
12. *Distance between alternative exits (levels 1 to 34) – NCC Clause D2D6*
13. *Distance between alternative exits (alternative exits not far apart as practical) – NCC Clauses D2D6*
14. *Travel via fire-isolated exits (discharge into common corridors) – NCC Clause D2D12*
15. *Travel via fire-isolated exits (discharge into covered area < 1/3 open) – NCC Clause D2D12*
16. *Discharge from exits (discharge from alternative exits not far apart as practical) – NCC Clause D2D15*
17. *Fire hydrants (location of fire brigade booster assembly) – NCC Clause E1D2*
18. *Fire control centres (access into fire control room) – NCC Specification 19*
19. *Fire control centres (location of fire control room) – NCC Specification 19*

*Note: At this stage of the design, the identified departures to the DtS provisions of the NCC are not exhaustive, and additional departures resulting in the development of additional Performance Solutions may arise throughout the detailed design process leading up to when a Construction Certificate is issued. This is routine practice for development of this scale and nature, and the level of detail that this statement has been prepared to is appropriate to this stage of the project lifecycle.*

## REQUIRED FIRE SAFETY SYSTEMS

The following fire safety systems will be required to be installed throughout the subject development:

- Fire hydrants – NCC Clause E1D2, AS 2419.1-2021
- Fire hose reels – NCC Clause E1D3, AS 2441-2005
- Fire sprinklers – NCC Specification 17, AS 2118.1-2017, AS 2118.6-2012
- Portable fire extinguishers – NCC Clause E1D14, AS 2444-2001
- Automatic smoke detection and alarm system – NCC Specification 20, AS 1670.1-2018
- Stair pressurization systems – NCC Clause E2D4, AS 1668.1-2015
- Emergency lighting and exit signs – NCC Clauses E4D2, E4D4, E4D5 & E4D8, AS/NZS 2293.1-2018
- Emergency lifts – NCC Clause E3D5
- Emergency warning and intercom systems – NCC Clause E4D9, AS 1670.1-2018

*Note: The above list may change or vary during the detailed design process and / or as a result of the future Fire Engineering Assessment and liaison with Fire & Rescue NSW (FRNSW). FRNSW is welcome to provide input during the Public Exhibition of this SSDA. Any feedback Agency stakeholders will be addressed as part of the Response to Submissions package for this project.*

## CONCLUSION

Innova Services Australia Pty Ltd has reviewed the proposed design and the identified departures to the DtS provisions of the NCC and advise that Performance Solutions can be developed that will be capable of demonstrating compliance with the relevant Performance Requirements of the NCC. The appropriate stage for this to occur would be post-approval design development before a Construction Certificate is issued.

The Fire Engineering process will require liaison with relevant stakeholders during the detailed design process, including Fire & Rescue NSW (FRNSW). This process may result in changes to the design to ensure an acceptable outcome for all relevant stakeholders. FRNSW is requested to consider this statement with appropriate regard for matters that can be readily resolved before a Construction Certificate is issued rather than before this SSDA is determined. This will ensure adequate design coordination without prejudicing assessment timeframes for this project.

Should you require any additional information with regards to the above please do not hesitate to contact the undersigned.

Yours Faithfully
**Innova Services Australia Pty Ltd**

Jason Powell
**Director**
Certifier – Fire Safety (BDC0801)
MIEAust, CPEng, NER