

3 March 2026
Our Ref: 25421-L01-01

UPG Edmondson Parkland Pty Ltd

Suite 110, Level 1,
180-186 Burwood Road
Burwood NSW 2134

Attention: Anthony Simac
Email: a.simac@urbanpropertygroup.com.au

Dear Anthony

EDMONDSON PARK SITES 3-5 - BUCHAN AVENUE, EDMONDSON PARK FIRE ENGINEERING STATEMENT (FOR SSDA SUBMISSION)

INTRODUCTION

This Fire Engineering Statement is submitted to the Department of Planning, Housing and Infrastructure (DPHI) on behalf UPG Edmondson Parkland Pty Ltd (UPG) (the Applicant), to support a State Significant Development Application (SSDA) and Concurrent Rezoning Report for the construction of a new multi stage residential project at Lots 4-5, 6-7, and 8 Buchan Avenue, Edmondson Park (known as Sites 3, 4 and 5) (the site).

The proposed development comprising a mix of shop-top housing, residential flat buildings (RFB), co-living housing, and affordable housing, together with public domain improvements including a new publicly accessible plaza, a public library and through-site pedestrian links.

The project has been identified by the NSW Housing Delivery Authority (HDA) as a key development to accelerate the delivery of well-located, diverse and affordable housing across Greater Sydney, with the HDA playing a coordinating role across government agencies to unlock complex sites through strategic planning, infrastructure coordination and streamlined assessment pathways.

On 19 February 2025, the HDA recommended that the proposed development on Sites 4 and 5 (6-7 and 8 Buchan Avenue, Edmondson Park), as outlined in EOI application 232588 dated 17 January 2025, be declared State Significant Development (SSD) under section 4.36(3) of the Environmental Planning and Assessment Act 1979, followed by a similar recommendation on 2 June 2025 for Site 3 (4-5 Buchan Avenue, Edmondson Park) as described in EOI application 246574 dated 14 March 2025. These recommendations were formalised through the Minister's issuance of State Significant Development Declaration Order (No. 9) 2025 on 12 June 2025, with the proposals to be facilitated by a concurrent amendment to the State Environmental Planning Policy (Precincts – Western Parkland City) 2021.

This document provides advice with regards to the proposed use of Performance Solutions to address identified fire safety related departures to the Deemed to Satisfy (DtS) provisions of the National Construction Code 2022 Volume One – Building Code of Australia Class 2 to 9 Buildings (NCC).

The purpose of this document is to assist in the design development process and to assist the Department of Planning, Housing and Infrastructure (DPHI) in the determination of the SSDA submission.

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NCC ASSESSMENT DATA

With reference to the BCA Compliance Report prepared by McKenzie Group Consulting (Revision 3, dated 2 March 2026), the relevant NCC Assessment Data for each site associated with the subject development is summarised in Table 1 to Table 3.

Table 1: Relevant NCC Assessment Data – Site 3

NCC Reference	NCC Assessment
Classification	Class 2 (Residential) Class 7a (Carpark) Class 7b (waste rooms, loading dock) Class 9b (public library)
Rise in Storeys	16
No. of Levels Contained	16
Minimum Type of Construction Required	Type A
Effective Height	Greater than 25 m (~48.25 m)
Maximum Fire Compartment Size	As applicable for Type A construction

Table 2: Relevant NCC Assessment Data – Site 4

NCC Reference	NCC Assessment
Classification	Class 2 (Residential) Class 7a (Carpark) Class 7b (waste rooms, loading dock) Class 10b (pool)
Rise in Storeys	26
No. of Levels Contained	27
Minimum Type of Construction Required	Type A
Effective Height	Greater than 50 m (~82.1 m)
Maximum Fire Compartment Size	As applicable for Type A construction

Table 3: Relevant NCC Assessment Data – Site 5

NCC Reference	NCC Assessment
Classification	Class 2 (Residential) Class 3 (co-living) Class 6 (retail supermarket, retail spaces) Class 7a (Carpark) Class 7b (residential storage cages, loading dock) Class 9b (childcare, fitness centre) Class 10b (pool)
Rise in Storeys	40
No. of Levels Contained	43
Minimum Type of Construction Required	Type A
Effective Height	Greater than 50 m (~127.5 m)
Maximum Fire Compartment Size	As applicable for Type A construction

REFERENCED DRAWINGS

Table 4: List of Referenced Architectural Drawings – Site 3

Drawing No.	Issue	Title	Date
DA-S3-0000	B	Cover Sheet	26-02-2026
DA-S3-0001	B	Existing Site Plan	26-02-2026
DA-S3-0002	B	Site Analysis	26-02-2026
DA-S3-0003	B	Proposed Site Plan	26-02-2026
DA-S3-0098	B	General Floor Plan – Basement 01	26-02-2026
DA-S3-0099	B	General Floor Plan – Lower Ground	26-02-2026
DA-S3-1000	B	General Floor Plan – Upper Ground	26-02-2026
DA-S3-1001	B	General Floor Plan – Level 01	26-02-2026
DA-S3-1002	B	General Floor Plan – Level 02	26-02-2026
DA-S3-1003	B	General Floor Plan – Level 03	26-02-2026
DA-S3-1004	B	General Floor Plan – Level 04-06	26-02-2026
DA-S3-1007	B	General Floor Plan – Level 07	26-02-2026
DA-S3-1008	B	General Floor Plan – Level 08	26-02-2026
DA-S3-1009	B	General Floor Plan – Level 09	26-02-2026
DA-S3-1010	B	General Floor Plan – Level 10	26-02-2026
DA-S3-1011	B	General Floor Plan – Level 11	26-02-2026
DA-S3-1012	B	General Floor Plan – Level 12-13	26-02-2026
DA-S3-1015	B	General Floor Plan – Roof	26-02-2026
DA-S3-2000	B	East Elevation	26-02-2026
DA-S3-2001	B	West Elevation	26-02-2026
DA-S3-2002	B	North Elevation	26-02-2026
DA-S3-2003	B	South Elevation	26-02-2026
DA-S3-3000	B	Sections – Sheet 01	26-02-2026
DA-S3-3001	B	Sections – Sheet 02	26-02-2026

Table 5: List of Referenced Architectural Drawings – Site 4

Drawing No.	Issue	Title	Date
DA-S4-0000	B	Cover Sheet	26-02-2026
DA-S4-0001	B	Existing Site Plan	26-02-2026
DA-S4-0002	B	Site Analysis	26-02-2026
DA-S4-0003	B	Proposed Site Plan	26-02-2026
DA-S4-0099	B	General Floor Plan – Lower Ground	26-02-2026
DA-S4-1000	B	General Floor Plan – Upper Ground	26-02-2026
DA-S4-1001	B	General Floor Plan – Level 01	26-02-2026
DA-S4-1002	B	General Floor Plan – Level 02-04	26-02-2026
DA-S4-1005	B	General Floor Plan – Level 05	26-02-2026

Drawing No.	Issue	Title	Date
DA-S4-1006	B	General Floor Plan – Level 06-14	26-02-2026
DA-S4-1015	B	General Floor Plan – Level 15-25	26-02-2026
DA-S4-1026	B	General Floor Plan – Roof	26-02-2026
DA-S4-2000	B	East Elevation	26-02-2026
DA-S4-2001	B	West Elevation	26-02-2026
DA-S4-2002	B	North Elevation	26-02-2026
DA-S4-2003	B	South Elevation	26-02-2026
DA-S4-3000	B	Sections – Sheet 01	26-02-2026
DA-S4-3001	B	Sections – Sheet 02	26-02-2026

Table 6: List of Referenced Architectural Drawings – Site 5

Drawing No.	Issue	Title	Date
DA-S5-0000	B	Cover Sheet	26-02-2026
DA-S5-0001	B	Existing Site Plan	26-02-2026
DA-S5-0002	B	Site Analysis	26-02-2026
DA-S5-0003	B	Proposed Site Plan	26-02-2026
DA-S5-0097	B	General Floor Plan – Basement 03	26-02-2026
DA-S5-0098	B	General Floor Plan – Basement 02	26-02-2026
DA-S5-0099	B	General Floor Plan – Basement 01	26-02-2026
DA-S5-1000	B	General Floor Plan – Ground	26-02-2026
DA-S5-1001	B	General Floor Plan – Level 01	26-02-2026
DA-S5-1002	B	General Floor Plan – Level 02	26-02-2026
DA-S5-1003	B	General Floor Plan – Level 03	26-02-2026
DA-S5-1004	B	General Floor Plan – Level 04-08	26-02-2026
DA-S5-1009	B	General Floor Plan – Level 09-11	26-02-2026
DA-S5-1012	B	General Floor Plan – Level 12-20	26-02-2026
DA-S5-1021	B	General Floor Plan – Level 21-25	26-02-2026
DA-S5-1026	B	General Floor Plan – Level 26-39	26-02-2026
DA-S5-1040	B	General Floor Plan – Roof	26-02-2026
DA-S5-2000	B	East Elevation	26-02-2026
DA-S5-2001	B	West Elevation	26-02-2026
DA-S5-2002	B	North Elevation	26-02-2026
DA-S5-2003	B	South Elevation	26-02-2026
DA-S5-3000	B	Sections – Sheet 01	26-02-2026
DA-S5-3001	B	Sections – Sheet 02	26-02-2026

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 Compliance Report prepared by McKenzie Group Consulting (Revision 3, dated 2 March 2026), it is likely that Performance Solutions will be proposed to be developed to address departures to the following DTS provisions of the NCC:

1. *Fire-resisting construction (rationalised fire resistance levels) – NCC Specification 5*
2. *Separation of classifications (exposure between compartments) – NCC Clauses C3D9, C3D10*
3. *Public corridors in Class 2 & 3 buildings (public corridors > 40 m in length) – NCC Clause C3D15*
4. *Exit travel distances (extended travel to an exit) – NCC Clause D2D5*
5. *Distance between alternative exits (extended travel between exits) – NCC Clause D2D6*
6. *Travel via fire-isolated exits (exposure to path of travel) – NCC Clause D2D12*
7. *Travel via fire-isolated exits (discharge into external covered areas) – NCC Clause D2D12*
8. *Fire hydrants (location of fire brigade booster assemblies) – NCC Clause E1D3*
9. *Fire hydrants (fire hydrant coverage) – NCC Clause E1D3*
10. *Fire control centres (location and access) – 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 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 each site associated with 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
- Zone pressurization systems – NCC Clause E2D6, 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

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MIEAust, CPEng, NER