

28 May 2026

Our Reference: 240342-Population-I2

Louise Densmore
Director Regional Assessments
Department of Planning, Housing and Infrastructure
12 Darcy Street
Parramatta NSW 2124

Dear Louise,

**Re: Request for Information – Fire Egress Compliance & Sprinklers in the Development
Commentary
Berrima Gaol Adaptive Reuse (SSD-66876472)**

Credwell Consulting have been requested to provide further information regarding the need for an additional opening(s) in the main perimeter gaol walls in order to meet compliance with Volume 1 of the Building Code of Australia 2022 Amendment 2 (BCA) as part of the National Construction Code (NCC) with respect to required egress paths (emergency fire escape routes) and use of the existing guard tower as more particularly documented in and related to our report 240342-NCC 2022-r1 dated 1 September 2025 for the Berrima Gaol Adaptive Reuse proposal (SSD-66876472)". Credwell are aware of the heritage significance of the site and it's listing on the NSW state heritage register.

BUILDING PARTICULARS

The Berrima Gaol Re-Development consists of four parts of the site but this letter only addresses inside the Gaol Walls (function spaces, restaurant, accommodation and ancillary areas).

DISCUSSION

Our report 240342-NCC 2022-r1 dated 1 September 2025 details the full BCA assessment of the proposal.

5. Fire Egress Compliance (point 1)

- *The Department requires a detailed evidence -based fire egress justification for the proposal demonstrating fire egress performance can be achieved. If the Gaol's fire egress performance is not achievable , explore opportunities to provide an additional emergency egress point in*

the southern prison wall, with a connecting pathway through the building to provide direct emergency egress from the conference room to the carpark.

This part of the proposal is an alteration of an existing building so the consent authority under Clause 64 of the *Environmental Planning and Assessment Regulation 2021* must consider if *‘the measures contained in the building are inadequate to facilitate the safe egress of persons using the building from the building, if there is a fire’*.

Population

The maximum population inside the gaol walls as part of the re-development is calculated to be 800 persons.

For a maximum population of 800 persons the total egress path width (and therefore width of opening(s) in the walls) must be 7.0 m (calculated in accordance with Clause D2D8 of the BCA).

A reduction in width has not been considered appropriate due to the issues discussed below.

Required Egress Path Width

There are currently two existing entrances/exits in and out of the gaol – the 1866 gate house at the front of the gaol and a ‘secret’ door to the western wall (only visible from inside the gaol). The ‘secret door’ should be increased in width to achieve a minimum 750 mm clear opening width (as permitted under Clause D2D9(c)) to be considered as a 1.0 m wide path of travel.

The main entry gate house double timber ‘doors’ provide for a 3.0 m wide clear access path but these do not have compliant hardware or direction of swing required in Part D3. The metal gates on the inside of the gatehouse will be permanently locked in the open position.

Currently the remaining 3.0 m required width is made up by the new restaurant opening doors in the eastern gaol wall.

The current proposal has been discussed with the Fire Engineer and the existing gate house timber doors being required to be kept in the open position whilst the function centre is being used for an event(s), and whenever the function centre is not in use then the gate house doors can be closed (leaving the rear secret door & the new restaurant opening doors as the compliant emergency exit pathways). This situation is similar to as permitted for an ‘entertainment venue’ under NSW Clause D3D24(20(e)) and D3D31.

A set of ‘compliant’ glass entry doors infilling the arch entry way be required for general security and access control.

It is proposed that the existing main entry gates are to remain in their current condition without any upgrade to maintain the ‘feel’ of the gaol including the historic features.

This proposal has been discussed with the Fire Engineer who has stated:

From a fire engineering perspective specific to both occupant life safety and fire brigade intervention the key points are important to note that the design ensures:

- *The respective locations of the doorways along the perimeter of the grounds and within the wall are evenly distributed and ensure that there are no dead ends in the event of a fire event. Where one exit was to be compromised, occupants have the ability to readily utilise the alternative pathways on the complete opposite side which provides suitable level of safety. Similarly, from a fire brigade operation, they can attack from locations which are remote from a potential fire location based on this configuration.*
- *It is understood that the existing heritage doorways will need to be managed as part of the operation of the facility to ensure this is adequate to provide egress/access. This will be developed in consultation with the fire authority to ensure that in any fire event that they can readily utilise all pathways.*
- *The final egress point is noted to be fully DtS compliant which again will ensure that occupants are readily able to evacuate safely and attending personnel can access the building accordingly.*
- *Finally, where the proposed heritage gates/doors were not deemed to be a suitable option, The proposal to adopt a further 3m in the bounding wall of the Gaol to the kitchen garden portion will provide further assistance in evacuation and occupants to safely reach road/open space. It is located such that it is remote from the secret door and the heritage/restaurant doorway and ensures that occupants can evacuate readily. This doorway would also provide further redundancy and safety factor for both occupants and attending personnel due to the limited updates permitted to the heritage doorway/gate.*
- *The overall approach presented above will be further developed and details as part of the CC stage of works where calculations and evacuation assessment will be undertaken to ensure adequate life safety and achieve compliance with the relevant Performance Requirements of the NCC.*

The remaining required width is to be obtained by new opening and doors / gates that will need to provide a minimum of 3.0 m clear width.

As the proposed location of the new opening in the eastern wall is adjacent to the existing gate house strong justification is provided for allowing the *existing main entry gates are to remain in their current condition without any upgrade* as this alternative will allow redirection and be readily apparent to those visiting the building.

Directing people to an opening in the southern wall of the gaol is not entirely practicable as this will not be adjacent to the main entrance that everyone will use.

5. Fire Egress Compliance (point 2)

- *The BCA report and proposed fire safety schedule reference automatic fire suppression systems (sprinklers) across the development but do not distinguish between the new hotel building and the existing gaol. Clarification is required regarding the extent of sprinkler installation within the gaol building. Installation of a new sprinkler system may have heritage implications.*

The new hotel and carpark areas are required to be provided with sprinkler protection. As the gaol is to be fire separated from the rest of building near the goods lift it is not required to be sprinkler protected so this service will not have .

Should you need any clarification or have any queries please do not hesitate to contact the undersigned.

Regards,

Robert Briant

Associate – Building Surveyor /Unrestricted (BDC 0048)

Credwell Consulting Pty Ltd