

01 July 2022

Alexandria Property Development Pty Ltd
C/- Johnstaff Projects (NSW) Pty Ltd
Level 5, 9 Castlereagh Street
SYDNEY NSW 2000

Attention: Maria Neuenschwander & Adam Thomas

**RE: 28-32 BOURKE ROAD, ALEXANDRIA
BCA / DDA CAPABILITY STATEMENT FOR CONCEPT SSDA SUBMISSION**

This statement has been prepared to verify that Blackett Maguire + Goldsmith Pty Ltd have undertaken a review of the architectural documentation that will accompany the Concept State Significant Development Application (SSDA) to the Department of Planning and Environment (DPE) for the proposed Alexandria Health Centre for Alexandria Property Development Pty Ltd against the National Construction Code (NCC) / Building Code of Australia Volume 1 2022 (Public Comment Draft and Preview Draft Stage 1) (BCA).

1.1 PROPOSAL

This concept application for the Alexandria Health Centre comprises a medical centre uses anchored by a mental health hospital for Alexandria Property Development Pty Ltd; in particular:

- + In principle arrangements for the demolition of existing structures on the site and excavation to accommodate a single level of basement car parking (partially below ground level).
- + A building envelope to a maximum height of 45 m (RL 53.41) (including architectural roof features and building plant).
- + A maximum gross floor area of 11,442.20 sqm, which equates to a maximum FSR of 3.85:1 according to the Project Town Planner.
- + Indicative use of the building as a Mental health hospital at levels 5-7; Medical centre uses at levels 1-4; and Ground level reception/lobby and pharmacy.
- + Principles for future vehicular ingress and egress from Bourke Road along the site's western frontage.
- + Subject to agreement on a public benefit offer to be submitted with this application, the proposal includes the indicative dedication of the following land to Council as envisaged by the Draft Sydney Development Control Plan 2012 – Southern Enterprise Area Amendment (Draft DCP):
 - o A 2.4m wide strip of land along the site's frontage to Bourke Road for the purpose of footpath widening
 - o A 3m wide lane along the site's western boundary contributing towards a 6m wide lane (it is noted that the concept proposal will allocate an additional 3 m strip of land within the site along the western boundary to enable two-way vehicle movement into and out of the site).
 - o A 3m wide lane along the site's southern boundary, contributing towards a 9m wide lane.

For future flexibility this Concept SSDA Stage NCC/BCA Capability Statement has assessed all floors as Health Care / Medical on the basis that each floor can accommodate a future use where inpatients or outpatients need assistance in evacuating the facility (e.g. uses such as renal and chemo therapy etc).



1.2 COMPLIANCE STATEMENT OBJECTIVES

The objectives of this statement are to:

- + Confirm that the Concept SSDA architectural documentation has been reviewed by an appropriately qualified Registered Building Surveyor and Accredited Certifier;
- + Confirm that the proposed new works have been assessed against the provisions of Clause 69 of the Environmental Planning & Assessment Regulation 2021 and are capable of compliance with the NCC/BCA;
- + Accompany the Concept SSDA submission to enable the Consent Authority to be satisfied that subsequent compliance with the fire & life safety and health & amenity requirements of the BCA, will not necessarily give rise to design changes to the building which may necessitate the submission of an application under S.4.55 of the Environmental Planning and Assessment Amendment Act 2017;
- + Enable the certifying authority to satisfy its statutory obligations under Clause 19 of the Environmental Planning & Assessment (DC&FS) Regulation 2021 which requires the certifying authority to be satisfied when issuing a Construction Certificate that the proposed new work will comply with the relevant requirements of the BCA as in force at the time the application for the construction certificate was made; and
- + Enable the Registered Certifier to satisfy its statutory obligations under Clause 24 and 25 of the Building and Development Certifiers Regulation 2020.

The purpose of this statement is to provide confirmation that the Architectural Concept Design is capable of complying with the relevant provisions of the NCC/BCA under a combination of DtS solutions and/or Performance Solutions prepared by appropriately qualified Registered/Accredited Consultants. This review is not intended to be a detailed review of the Architectural Drawings submitted for the Concept SSDA, a detailed review will be undertaken with the Construction Certificate (CC) application.

1.3 REFERENCED DOCUMENTATION

- + Building Code of Australia 2022 Volume 1 (Public Comment Draft and Preview Draft Stage 1) (BCA);
- + The Guide to the Building Code of Australia 2022 (BCA); and
- + Architectural Plans prepared by NBRS Architecture Scheme plans:

DRAWING NO.	REVISION	DATE	DRAWING No.	REVISION	DATE
SD-A-SK101	1	1.04.2022	SD-A-SK102	Nil	Nil
SD-A-SK103	1	1.04.2022	SD-A-SK104	1	1.04.2022
SD-A-SK105	1	1.04.2022	SD-A-SK106	Nil	Nil

1.4 BUILDING CLASSIFICATION

The new building works have been classified as follows:

BCA Classification: (Refer to Note 1)	<ul style="list-style-type: none"> + Class 6 (Ground Floor Café/Retail/Pharmacy) + Class 7a (Basement and Ground Floor Car Park) + Class 8 (Ground Floor Electricity Network Substation & Storage/loading dock) + Class 9a (Ground-L8 Health Care/Hospital & ancillary areas including areas which can be attended by inpatients or outpatients such as renal and chemotherapy etc)
Rise in Storeys: (Refer to Note 2)	10 (Ten)
Storeys Contained:	11 (Eleven)
Type of Construction:	Type A Construction
Importance Level (Structural): (Refer to Note 3)	Importance Level 3 (As determined by NER Structural Engineer)
Sprinkler Protected Throughout:	Yes – The entire building is proposed to be protected with a sprinkler system design in accordance with AS 2118.1-2017 and/or AS2118.6-2012



Effective Height:	Circa 45m (>25m & <50m Based on maximum height of building including lift overruns, plant etc)
Floor Area:	22,553.30m ² (based on a max FSR of 3:85:1)
Max. Fire Compartment Size:	+ Class 5, 6, 7, 8 & 9: 5,000m ² & 30,000m ³ ; + Class 9a: <ul style="list-style-type: none">o 5,000m² in non-patient careo 2,000m² in patient care
Climate Zone:	Zone 5

Note 1: We have assumed that there will be no uses such as Class 8 (pathology containing Dangerous Goods or PC Labs) and no Class 9b (Education/Public Assembly Areas); further assessment and Class designation will be required should these uses form part of the intended use of the facility.

Note 2: The following commentary is made with regards to Rise in Storeys and Effective Height:

- + NCC/BCA Cl. C2D3(2)(a) does allow concessions to disregard the top most storey from the Rise in Storeys assessment where that storey is situated at the top of the building and contains only heating, ventilating or lift equipment, water tanks, or similar service units or equipment.

Notwithstanding, we have been requested to consider the building envelope and provide the most conservative assessment with regards to Rise in Storeys and as such we will assume Cl. C2D3(2)(a) does not apply to the top most storey and possibly the inclusion of another storey (where this additional storey can be included within the approved envelope for the future building).

- + We have assumed that the basement carpark storey is substantially above ground and has been included in Rise in Storeys assessment and that the concession under NCC/BCA Cl. C2D3(2)(b) cannot be sought.
- + Effective Height is the vertical distance between the floor of the lowest storey included in the calculation of Rise in Storeys and the floor of the topmost storey (excluding the topmost storey if it contains only heating, ventilating, lift or other equipment, water tanks or similar service units). In this regard the lowest point of the Lower Ground floor (RL 7.410) and hypothetical to-most storey (RL 53.21) not discounted from the Rise in Storeys assessment have been considered conservatively under this assessment.

Note 3: Importance levels to be validated by the Project NER Structural Engineer with their Construction Certificate Stage Certification. Enstruct have provided advice that Importance Level 3 applies to this facility as there is no intention to use the facility with any use synonymous with Importance Level 4 (including operating and Emergency Department).

1.5 SUMMARY OF BCA COMPLIANCE

Arising from our review, it is considered that the proposed development can readily achieve compliance with the relevant provisions of the NCC/BCA. It is noted that the proposed development must comply with the relevant Performance Requirements of NCC/BCA and this can be achieved by complying with the following:

- + Performance Solution; or
- + Deemed-to-Satisfy Solution (DtS); or
- + A combination of (a) and (b).

In accordance with the above, BM+G verify that the proposed building design will include solutions with a combination of compliance with the DtS provisions and Performance Requirements of the NCC/BCA, the latter with justification of Performance Solutions prepared by suitably Registered/Accredited Consultants.

Detailed documentation demonstrating compliance with the NCC/BCA will be required for assessment with Construction Certificate application. Notwithstanding, our review of the Concept SSDA documentation indicates that compliance the design is capable of compliance.

Note 1: A Fire Source Feature (FSF) is the far boundary of a public road or laneway adjoining the allotment; or a side or rear boundary of the allotment. It is understood that the external wall of the building will be setback from a FSF or the external walls will be protected in accordance with C2D2 / Spec. 5 Cl. S5C11 / Table S5C11 and openings within the external walls will be protected in accordance with and C4D3/C4D5.

Where a public laneway is not created when the building requires an Occupation Certificate then the concession to measure to the far boundary of a public road or laneway adjoining the allotment cannot be sought and instead the perimeter boundary separating the subject site will be treated like a rear boundary in the absence of appropriate easements / ROWs permitting the legal right to use the allotment which will be dedicated to a future laneway (this will need to be assessed/supported under a Fire Engineered Performance Solution).



Note 2: This assessment is predicated on any inter-allotment boundaries being consolidated to create a single allotment which will contain the new concept Alexandria Health Centre.

1.6 DISABILITY (ACCESS TO PREMISES – BUILDINGS) STANDARD 2010

The Disability (Access to Premises-Buildings) Standards 2010 (the Access to Premises Standards) requires the building to comply with the Access Code (NCC/BCA Part D4 & AS 1428.1-2009/2021).

With respect to the proposed new building, compliance with the Access Code is achieved if the building complies with:

- + BCA clauses D4D2 to D4D13;
- + BCA clause E3D7 to E3D8;
- + BCA clauses F4D3 and F4D4.

The referenced plans show that access for people with disabilities will be available to and within the building from the main points of a pedestrian entry at the allotment boundary and accessible car spaces in accordance with BCA clause D4D2.

It is understood that the design may be informed by access standards above and beyond the minimum NCC/BCA access requirements such as AS1428.1-2021 (and even where possible AS1428.2 as a guidance document to be agreed with the Construction Certificate application) from Safety in Design (or risk mitigation perspective) in relation to DDA. Whilst NCC does not currently adopt AS1428.1-2021 it is understood that a potential out-of-cycle amendment will occur which will result in NCC adopting the 2021 within the next few years.

Detailed documentation demonstrating compliance with the above NCC/BCA provisions and AS 1428.1-2009/2021 will be required for assessment with Construction Certificate application. Notwithstanding, our review of the Concept SSDA documentation indicates that compliance the design is capable of compliance. In the event that NCC/BCA DTS compliance is not achieved, a Performance Solution will need to be documented by an appropriately qualified Access Consultant.

1.7 PRELIMINARY FIRE SAFETY SCHEDULE

The following comprises a preliminary fire safety schedule containing statutory fire safety measures that will apply to the new building based on this Concept SSDA building envelope review:

STATUTORY FIRE SAFETY MEASURE	DESIGN / INSTALLATION STANDARD	EXISTING	PROPOSED
Access Panels, Doors & Hoppers	BCA Clause C4D14 & AS 1530.4 – 2014 and Manufacturer's Specifications		✓
Alarm Signalling Equipment	NSW BCA Spec. 20 Clause S20C8 & AS 1670.3 – 2018		✓
Automatic Fail-Safe Devices (Doors & Gates)	BCA Clause D3D26		✓
Automatic Fire Detection & Alarm System	BCA Clause E2D3, Spec. 20 & BCA Spec. 23 AS 1670.1 – 2018		✓
Automatic Fire Suppression Systems	BCA Clause E1D4, Spec. 17 & BCA Spec. 18 AS 2118.1 – 2017 or AS 2118.6 – 2012		✓
Building Occupant Warning System activated by the Sprinkler System and Smoke Detection	BCA Clause E2D3 and BCA Spec. 17, Spec. 20 & Clause 8 and / or Clause 3.22 of AS 1670.1 – 2018		✓
Emergency Lifts	BCA Clause E3D5 AS 1735.2 – 2001		✓
Emergency Lighting	BCA Clause E4D2 & E4D4 AS 2293.1 – 2018		✓
Emergency Evacuation Plan	AS 3745 – 2010		✓
Emergency Warning Intercom System (EWIS)	BCA E4D9, G3D8, Spec. 31 Clause S31C19 AS1670.4 - 2018		✓



STATUTORY FIRE SAFETY MEASURE	DESIGN / INSTALLATION STANDARD	EXISTING	PROPOSED
Exit Signs	BCA Clauses E4D5, NSW E4D6 & E4D8 AS 2293.1 – 2018		✓
Fire Control Centres	BCA E1D15 & Spec, 19		✓
Fire Blankets	BCA Clause E1D14 AS 3504 – 2006 & AS2444 – 2001		✓
Fire Dampers	BCA Clause C4D15 & Spec. 11 AS 1668.1 – 2015 & AS 1682.1 & 2 – 2015 and Manufacturer's Specification		✓
Fire Doors (Including Lift Landing Doorsets)	BCA Clause C3D13, C3D14, C4D3, C4D5, C4D6, C4D7, C4D8, C4D9 & C4D12 AS 1905.1 – 2015 and Manufacturer's Specification		✓
Fire Hose Reels	BCA Clause E1D3 AS 2441 – 2005		✓
Fire Hydrant Systems	BCA Clause E1D2 AS 2419.1 – 2021		✓
Fire Seals	BCA Clause C4D15, AS 1530.4 – 2014 & AS 4072.1 – 2005 and Manufacturer's Specification		✓
Fire-resisting Building Elements (Walls, Floors & Shafts)	BCA Section C & Spec. 5 Cl. S5C11		✓
Fire Shutters	BCA Clause C4D5, Spec. 12 AS 1905.2 – 2005		✓
Fire Windows	BCA Clause C4D5, Spec. 12 AS 1530.4 – 2014 and Manufacturer's Specification		✓
Planning for Emergencies – Health Care Facilities	AS 4083 – 2010		✓
Lightweight Construction	BCA Clause C2D9 AS 1530.4 – 2014 and Manufacturer's Specification		✓
Loadbearing Internal Walls (Concrete or Masonry)	BCA Section C & Spec. 5 Cl. S5C11(1)		✓
Manual Call Points (BGA's)	BCA Section E & Spec. 20 Cl. S20C4(3)		✓
Mechanical Air Handling Systems (Automatic Shutdown)	BCA Part E2 AS/NZS 1668.1 – 2015 & AS 1668.2 – 2012		✓
Paths of Travel	EP&A (DC&FS) Reg. 2021 Clause 109		✓
Portable Fire Extinguishers	BCA Clause E1D14 AS 2444 – 2001		✓
Required Exit Doors (Power Operated) (Non-Patient Care Areas)	BCA Clause D3D24(2)		✓
Self-Closing Fire Hoppers	BCA Clause C4D14 AS 1530.4 – 2014		✓
Smoke Hazard Management Systems + Stair Pressurisation + Smoke Exhaust/Extraction + Zone Smoke Control	BCA Part E2, Spec. 20, Spec. 21, Spec. 22 AS/NZS 1668.1 – 2015		✓
Smoke Dampers	BCA Spec. 11 AS/NZS 1668.1 – 2015		✓
Smoke Doors & Smoke-proof Walls	BCA Clause C3D6, Spec. 11 & 12		✓



STATUTORY FIRE SAFETY MEASURE	DESIGN / INSTALLATION STANDARD	EXISTING	PROPOSED
Smoke Seals	BCA Clause C3D6, Spec. 11		
Stand-by Power Systems	BCA Clause E1D2, E3D5, E4D2 & E4D5 AS 3000 – 2018		✓
Wall-Wetting Sprinklers	BCA Clause C4D5 AS 2118.2 – 2010		✓
Warning & Operational Signs	EP&A (DC&FS) Reg. 2021 Clause 108 BCA Clause C4D7, D3D28, D4D7, E3D4 AS 1905.1 – 2015		✓
Fire Engineered Performance Solutions relating to: 1. TBC with CC Application	TBC with CC Application - BCA Performance Requirements ... Fire Safety Engineering Report prepared by Report No. Revision dated		✓

NOTE:

- + *The measures included and the standards of performances nominated above may vary as a result of any proposed Fire Engineered Performance Solutions.*
- + *The above list is a schedule of fire safety measures required under Section E of the NCC/BCA only and does not take into consideration any other measures that may be required in the building as a result of other requirements of the NCC/BCA or other statutory standards.*

1.8 CONCLUSION

This statement contains an assessment of the referenced Concept SSDA Architectural Documentation for the proposed concept Alexandria Health Centre at 28-32 Bourke Road, Alexandria against the DtS provisions of the BCA 2022 (Public Comment Draft and Preview Draft Stage 1) and the Disability (Access to Premises – Buildings) Standards 2010.

It is our experience that such compliance matters raised are not uncommon for a development of this nature and that they can be readily addressed with the Construction Certificate application. In this instance, subject to the exit locations/discharges associated with Lower Ground and Ground Floor (and building exposure to egressing occupants) being resolved, we are of the opinion that any amendments thereafter required to the design documentation in order to comply with the BCA can be addressed in the preparation of the detailed documentation with Construction Certificate application without giving rise to significant changes to the proposal as submitted for Concept SSDA.

Arising from our review and comments above, it is considered that the proposed development can readily achieve compliance with the relevant provisions of the NCC/BCA under a combination of DtS solutions and/or Performance Solutions prepared by appropriately qualified Registered/Accredited Consultants.

Prepared by:

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