GROUPDLA

20/04/2026

Department of Planning, Housing and Infrastructure
Att: Minister for Planning
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

Dear Minister Scully,

Building Code of Australia 2022 Amendment 2 (BCA) Capability Statement
Property: Campbelltown Arts Centre Expansion – 1 Art Gallery Rd, Campbelltown NSW 2560
Project Number: GDL250336

This BCA Capability Statement prepared by Group DLA on behalf of Campbelltown City Council is submitted to the Department of Planning, Housing and Infrastructure (DPHI) in support of a State Significant Development Application (SSDA) for the expansion of the existing Campbelltown Arts Centre (CAC) on land at 1 Art Gallery Road, Campbelltown (the site).

The purpose of this submission is to advise that we have undertaken a preliminary assessment of the architectural drawings, as listed below in Appendix A, to determine if the proposed development is capable of achieving compliance with the provisions of the National Construction Code 2022 Amendment 2, Volume 1, Building Code of Australia, BCA Class 2 to 9 Buildings (BCA), as per the requirements under Section 19 of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulations 2021 ("EP&A Regs Fire Safety").

Proposed Development:

This SSDA seeks approval for:

- Demolition of parts of the existing buildings and structures on site.
- Expansion and redesign of the existing CAC, including the following elements:
  - Reorientation of the building towards Queen Street in the north to create a more substantial, welcoming and visible connection to the City Centre.
  - Addition of a new 350 seat theatre with back of house facilities.
  - Providing rehearsal spaces, creative and educational workshop areas, and community facilities.
  - Provision of ancillary artists' residences.
  - Provision of commercial spaces including a café/restaurant, retail, and conference facilities.
  - Provision of expanded gallery spaces for the exhibition of artists' collections and dedicated storage for loaned artworks and collections.
- Landscaping works including provision of feature planting and paving.
- Expansion and reconfiguration of at grade car parking.
- Extension and augmentation of services and infrastructure as required.

For a further detailed project description, please refer to the Environmental Impact Statement prepared by Colliers Urban Planning, the Architectural Drawings prepared by fjcstudio, and the other accompanying technical documents that form part of the State Significant Development Application.

The Site:

The site is located at 1 Art Gallery Road, Campbelltown and is legally identified as Lot 500 DP777387, Lot B DP157318, Lot 1 DP1038779, Lot 2 DP259807 and Lot 3 DP259807, as illustrated in the Site Aerial at Figure 1. It is situated within the Campbelltown local government area (LGA) immediately southwest of the Campbelltown City Centre and railway station. The existing development on site consists of the current Campbelltown Arts Centre, characterised by a double storey built form with open space and an at-grade carpark.

The site is bounded by Art Gallery Road to the west, Narellan Road to the south, Oxley Street to the east and Camden Road to the north. The northern part of the site is separated from the southern portion by Art Gallery Road as shown in Figure 1. The site comprises a total site area of approximately 18,877m2.

Figure 1 - Site Aerial

BCA Building Characteristics

The proposed development includes a range of functional spaces that fall under multiple building use classifications. The main building characteristics are outlined below:

- Class 5 – Office. Includes administrative offices and associated workspaces.
- Class 7a – Loading Dock. A dedicated loading dock used for goods handling, deliveries, and back-of-house operations.
- Class 7b – Storage. A dedicated collections store and a range of other miscellaneous store rooms.
- Class 9b – Public Assembly / NSW Entertainment Venue. Includes the theatre, galleries, studios, workshops, conference rooms, café/restaurant, and other public-use areas.
- Class 1b - Artist Residences. Guest house accommodations for the Artist which includes a studio and a two bedroom.

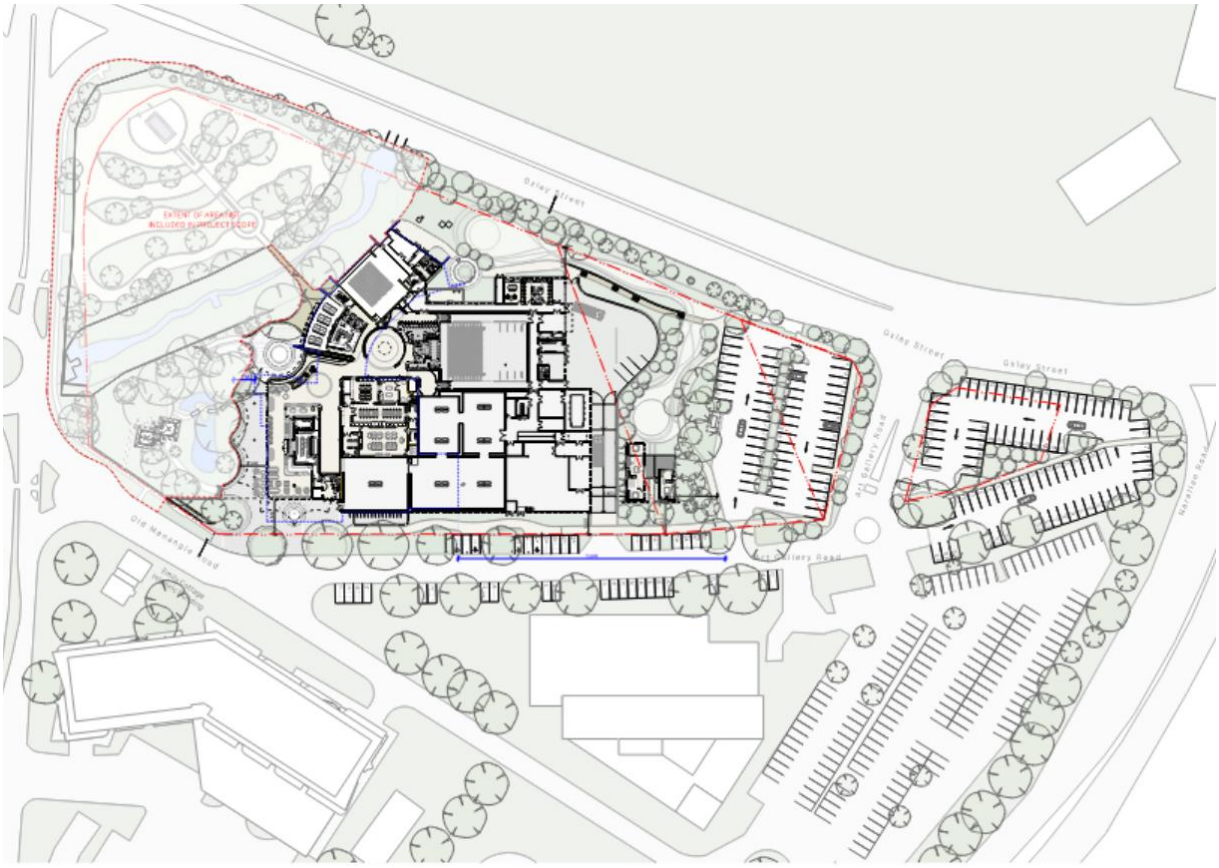

Figure 2 – Propsed Development

Art Gallery

Characteristic	Description
BCA Classification	Class 5 Office, Class 7a Loading Dock, Class 7b Storage, Class 9b Public Assembly / NSW Entertainment Venue
Type of Construction:	Type A
Floor Area of Building:	8,159 m^2
Volume of the Building:	29,893 m^3
Max Fire Compartment Size – Area:	4,656 m^2
Max Fire Compartment Size – Volume:	TBC
Rise in Storeys:	3
Levels Contained:	3
Effective Height:	<12m
Climate Zone:	Zone 6
Building Importance Level:	3 or 4 - Structural Engineer to Confirm
Earthquake Design Category:	II or III - Structural Engineer to Confirm

Table 1 – Building Characteristic – Art Gallery

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Artist Accommodation and Studios

Characteristic	Description
BCA Classification	Class 1b – Guest House *Note: The building accommodates less than 12 people and is less then 300m2*
Type of Construction:	N/A
Floor Area of Building:	Circa 165m^2
Volume of the Building:	Circa 462m^3
Rise in Storeys:	N/A
Levels Contained:	1
Effective Height:	N/A
Climate Zone:	6
Building Importance Level:	2 - Structural Engineer to Confirm
Earthquake Design Category:	II or III - Structural Engineer to Confirm

Table 1 - Building Characteristic - Artist Accommodation and Studios

BCA Assessment

Compliance with the BCA for the proposed development is capable of being achieved by a combination of compliance with the deemed-to-satisfy (DTS) provisions and the provision/documentation of Performance Solutions in accordance with Clause A5G3 of the BCA by a suitably qualified consultant/s to achieve compliance with the performance provisions of the BCA, the provision and assessment of these reports/documents/plans will occur at the Construction Certificate (CC) stage.

The Group DLA BCA Report Rev D, dated 10/04/2026, outlines the current areas of consideration which are to form part of a performance solution justification and/or to achieve DtS design accordingly, either way compliance will be illustrated during the Detailed Design Stages. Summary of this is provided as follows.

Part B – Structure

No issues identified at this stage of the documentation. Structural Engineer, Façade Engineer and Civil Engineer and Designers are to confirm structural compliance prior to issuance of the Construction Certificate.

Part C2 – Fire Resistance and Stability

The building will generally be provided with the minimum Fire-Resistant Level (RFL) required by the Deemed-to Satisfy (DtS) provisions of the BCA. Fire Rating Design Documentation will be developed through detailed design. Any departments from the DtS Provisions, which have been listed below, will be either amended through the design development to align with the DtS Provisions or will assess by the Fire Engineering through a Performance Solution within a Fire Engineering Report. This will be completed prior to issuance of the Construction Certificate. A Cladding Audit on the existing facade in regard to combustibility investigations are to be provided during detail design phase.

Part C3 – Compartmentation and Separation

The building is not proposed to exceed the maximum fire compartments required under this part of the BCA. Generally, the Building will be provided with the minimum Fire-Resistant Level (RFL) required by the Deemed-to Satisfy (DtS) provisions of the BCA. RFL Design Documentation will be developed through detailed design. Any departments from the DtS Provisions, which have been listed below, will be either amended through the design development to align with the DtS Provisions or will assess by the Fire Engineering through a Performance Solution within a Fire Engineering Report. This will be completed prior to issuance of the Construction Certificate.

Part C4 – Protection of Openings

The building will generally be provided with the minimum protection of openings located in the external walls and internal building elements, including service penetrations, required by the Deemed-to Satisfy (DtS) provisions of the BCA. RFL Design Documentation and Test Reports will be developed through detailed design. Any departments from the DtS Provisions, which have been listed below, will be either amended through the design development to align with the DtS Provisions or will assess by the Fire Engineering through a Performance Solution within a Fire Engineering Report. This will be completed prior to issuance of the Construction Certificate.

Part D2 – Provision for Escape

The building will generally be provided with adequate means of egress required by the Deemed-to Satisfy (DtS) provisions of the BCA. Any departments from the DtS Provisions, which have been listed below, will be either amended through the design development to align with the DtS Provisions or will assess by the Fire Engineering through a Performance Solution within a Fire Engineering Report. This will be completed prior to issuance of the Construction Certificate.

Part D3 – Construction of Exits

The building will generally be provided with the minimum construction of exit required by the Deemed-to Satisfy (DtS) provisions of the BCA, including stairways, ramps, handrails, balustrades, fall prevention barriers and operation of doors. Any departments from the DtS Provisions, which have been listed below, will be either amended through the design development to align with the DtS Provisions or will assess by the Fire Engineering through a Performance Solution within a Fire Engineering Report. This will be completed prior to issuance of the Construction Certificate.

Part D4 – Access for People with Disabilities

Refer Group DLA Access Consultants Capability Statement dated 10 April 2026 for Assessment against this part of the relevant DDA Access BCA provisions.

Part E1 – Fire Fighting Equipment

The building will generally be provided with the minimum Fire Fighting Equipment required by the Deemed-to Satisfy (DtS) provisions of the BCA Any departments from the DtS Provisions, which have been listed below, will be either amended through the design development to align with the DtS Provisions or will assess by the Fire Engineering through a Performance Solution within a Fire Engineering Report. This will be completed prior to issuance of the Construction Certificate.

Part E2 – Smoke Hazard Management

The building will generally be provided with the minimum Smoke Hazard and automatic warning required by the Deemed-to Satisfy (DtS) provisions of the BCA. Any departments from the DtS Provisions, which have been listed below, will be either amended through the design development to align with the DtS Provisions or will assess by the Fire Engineering through a Performance Solution within a Fire Engineering Report. This will be completed prior to issuance of the Construction Certificate.

Part E3 - Lift Installations

The building will generally be provided with the minimum lift installation for safe and emergency required by the Deemed-to Satisfy (DtS) provisions of the BCA. Design Documentation is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

Part E4 – Visibility in an emergency, exit signs and warning systems

The building will generally be provided with the minimum lighting to main visibility of evacuation routes during an emergency required by the Deemed-to Satisfy (DtS) provisions of the BCA. Design Documentation is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

Part F1 – Surface water management, rising damp and external waterproofing

The building will generally be provided with the minimum requirements to prevent water penetration into the building as required by the Deemed-to Satisfy (DtS) provisions of the BCA. Design Documentation is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

Part F2 – Wet areas and overflow protection

The building will generally be provided with the minimum requirements to minimise the risk of water from internal wet areas as required by the Deemed-to Satisfy (DtS) provisions of the BCA. Design Documentation is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

Part F3 – Roofing and wall cladding

The building will generally be provided with the minimum requirements to prevent water penetration into the building as required by the Deemed-to Satisfy (DtS) provisions of the BCA. As listed below, the external wall system will be subject to a F3P1 Weather Proofing Performance Solution Report completed by a suitable qualified façade Engineer. This will be completed prior to issuance of the construction Certificate.

Part F4 – Sanitary and Other Facilities

The building has been provided with the minimum sanitary facilities are required by the Deemed-to Satisfy (DtS) provisions of the BCA. Further Design Documentation of the construction of the amenities is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

Part F5 – Room Heights

The building will generally be provided with the minimum ceilings heights required by the Deemed-to Satisfy (DtS) provisions of the BCA. Design Documentation is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

Part F6 – Light and Ventilation

The building will generally be provided with the minimum light and ventilation required by the Deemed-to Satisfy (DtS) provisions of the BCA. Design Documentation is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

Part G5 – Minor structure and components

This building will generally be provided with the minimum requirements for minor structure and components required by the Deemed-to Satisfy (DtS) provisions of the BCA. Design Documentation is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

Part G6 – Occupiable outdoor areas

This building will generally be provided with the minimum requirements for occupiable outdoor areas required by the Deemed-to Satisfy (DtS) provisions of the BCA. Design Documentation is required to illustrate compliance. This will be completed prior to issuance of the Construction Certificate.

NSW Part I4 – NSW Entertainment Venues

This building will generally be provided with the minimum requirements for specific fire safety and construction requirements for buildings where people gather for assembly, entertainment, or public use required by the Deemed-to Satisfy (DtS) provisions of the BCA. Any departments from the DtS Provisions, which have been listed below, will be either amended through the design development to align with the DtS Provisions or will assess by the Fire Engineering through a Performance Solution within a Fire Engineering Report. This will be completed prior to issuance of the Construction Certificate.

Part J – Energy Efficiency

Compliance with Section J is required for this development. The building is located within Climate Zone 6. An appropriately qualified ESD/Energy Efficiency consultant is to provide a Section J Report that confirms compliance of all new proposed building works against Section J of the BCA. This will be completed prior to issuance of the Construction Certificate

Performance Solutions

At this stage of the documentation, the following DTS issues have been identified which are to form part of a Performance Solution justifications and/or be rectified through design accordingly, either way, compliance will be illustrated as the Detailed Design Stage prior to the Construction Certificate.

- Fire Engineering: Building Element - Fire Rating Relaxations
- Fire Engineering: Combustible External Wall Elements
- Fire Engineering: Separation of Fire Compartments – Walls and Floor Construction
- Fire Engineering: Fire Wall Roof Termination Construction
- Fire Engineering: Separation of External Walls and association openings in different Fire Compartments
- Fire Engineering: Fire Shutter Curtain – FRL Relaxation
- Fire Engineering - Multiple Allotment Boundaries
- Fire Engineering: Travel Distances to Exits – Excessive
- Fire Engineering: Path of Travel Widths – Undersized
- Fire Engineering: Path of Travel Heights – Undersized

- Ergonomic: Existing Stair 2 – Safe Movement – Going and Risers, Nosing's, Handrails and Barrier upgrade
- Ergonomic: Stair 3 – Safe Movement– Going and Risers, Nosing's, Handrails and Barrier upgrade
- BCA: Barrier Height Upgrades
- BCA: Roof Access Ladders Upgrades
- Ergonomic: Door Thresholds
- Fire Engineering: Door Swing
- Fire Engineering: Existing Door Hardware + Panic Bars
- Fire Engineering: Panic Bars – Omitted in certain cases
- Fire Engineering: Entertainment Venue – Egress Item for Consideration
- Fire Engineering: Non-Fire Isolated Required Exit Stair (Level 2) – Discharge
- Fire Engineering: Aggregated Unobstructed Exit Widths – Undersized
- Fire Engineering: Egress from Concealed Wall Voids in the Gallery
- Fire Engineering: Automatic Sliding Exit Doors – Fail Safe Open + Swing Door Requirements
- Fire Engineering: Doorways in Required Exit - Collapsible Gate
- Ergonomic: Stair 02 - Curved Required Exit Stair
- Fire Engineering: Fire Hose Reel Locations Upgrade
- Fire Engineering: Smoke Detection System Upgrade
- Fire Engineering: Emergency Lighting & Exit Signs Upgrade
- Fire Engineering: Assembly Building in Fire Compartments more than 2000m2 Smoke Hazard Management
- Fire Engineering / Mechanical: Smoke Control Requirements
- Fire Engineering: Electrical Vehicles
- Fire Engineering: Fire Hydrants – Omission
- Fire Engineering: Fire Services Omissions – Retractable Seating
- Façade: External Wall Weatherproofing
- BCA: Sanitary Facility Screening
- Fire Engineering: Continental Seating – Egress Doorways and Clear Space
- Fire Engineering: Number of Exits Backstage

Further consideration and review with respect to compliance with the Disabled Access, and Section J Energy Efficiency, and Weatherproofing of the facade provisions will be undertaken by suitably qualified consultants which will form part of the CC Documentation.

Notwithstanding the above comments we note that specific detailed compliance with the BCA is not a prescribed head of consideration under Section 4.15 of the Environmental Planning & Assessment Act 1979 and accordingly, we trust that the determination of the development application will not be subject to the assessment of any technical matters under the state's building regulations.

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In this regard and pursuant to Clause 36 of the Environmental Planning & Assessment Regulations 2021 (“EP&A Regs 2021”), we trust that the Consent Authority will not require any additional information in the determination of the development application for technical BCA matters that will be assessed at the Construction Certificate stage.

As such we hereby confirm that matters pertaining to compliance with the BCA will be suitably assessed by the appointed Certifying Authority (as supported by Group DLA as the BCA Consultant) prior to the issue of the Construction Certificate in accordance with Clause 69 of the EP&A Regs 2021.

We trust this submission satisfies any concerns of the Consent Authority with compliance of the development with the relevant requirements and provisions of the BCA.

Should you require further assistance or clarification please do not hesitate to contact the undersigned at your convenience.

Yours sincerely

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Appendix A – Plan Documentation Assessed

Drawing No.	Title	Prepared By	Revision	Date
CAC-1200	Site Plan	FJC	09	16/04/2026
CAC-2000	Ground Floor Plan	FJC	12	16/04/2026
CAC-2001	Level 1 Floor Plan	FJC	10	16/04/2026
CAC-2002	Lower Roof Plan	FJC	10	16/04/2026
CAC-2003	Roof Plan	FJC	10	16/04/2026