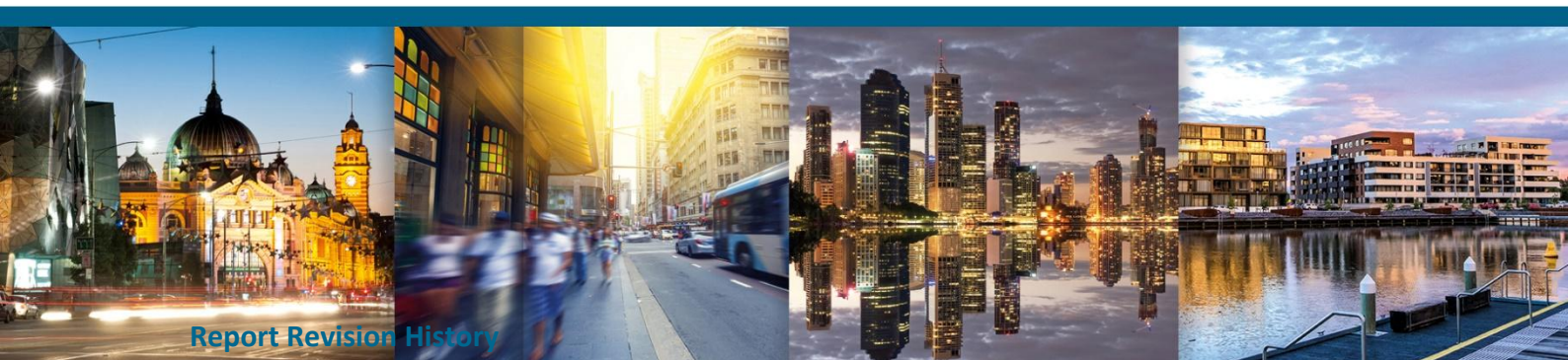




2024 / 3089 - BCA Report (short) DA Submission

Macarthur Gardens North R3
Goldsmith Ave. Campbelltown

Preliminary BCA and Certification Assessment



Report Revision History

Revision History

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Executive Summary

This BCA Report been prepared by Steve Watson & Partners to accompany a State Significant Development Application (SSDA) for an affordable housing development within the Macarthur Gardens North precinct (MGN) in the Campbelltown Local Government Area (LGA). The MGN precinct is identified as Lot 1097 in DP1182558.

Consent SSD-80482713 was approved for the premises on 29 April 2026. The project identified significant cost overruns early 2026. In response, the design team undertook value engineering and developed a revised scheme that reduces a floor, adjusts the apartment mix, and refines the basement and tower layout to improve cost efficiency. This approach was presented to DPHI on 18 March 2026, with agreement to proceed via a DA modification. This report has been prepared to assist with the DA modification as per DKO report dated 19/06/2026 and plans referenced in Appendix A.

This report concludes that the proposed development is suitable and warrants approval subject to the implementation of the following mitigation measures identified . This report details the non-compliances identified that require either amendments to plans or a Performance Solution to satisfy the Performance Requirements of the BCA.

Summary of BCA Parameters:

Building Use:	Residential and basement car park and ancillary
Class of Occupancy	Class 2 & 7a
Type of Construction Required	Type A
Rise Storeys:	9
Number of Storeys:	9
Effective Height:	Approx 26.88 m (L 8 RL 101.900. – Basement RL75.050) > 25 m

Introduction

This report presents the findings of a preliminary assessment of the proposed new affordable housing development within the Macarthur Gardens North precinct (MGN) in the Campbelltown Local Government Area (LGA) the MGN precinct is identified as Lot 1097 in DP1182558. The assessment is undertaken against the Deemed-to-Satisfy (DtS) provisions of Building Code of Australia (BCA) 2022 amendment 2.

It has been prepared by building regulations consultants and certifiers Steve Watson and Partners for Landcom.

Purpose

The purpose of this report is to identify issues and omissions in the audited documentation that are required to be addressed to permit the lodgement and approval of an application for a Construction Certificate under Part 6 of the EP&A Act.



Scope

The scope of this assessment is limited to the design documentation referenced in Appendix A of this report.

Audit Report and Certification Work

This report is provided with strict regard to the conflict of interest requirements in Part 3 the Building and Development Certifiers Act 2018 and Part 4 of the Building and Development Certifiers Regulation 2020, with particular reference to Clause 25(5) of the Regulation.

Hence, the contents of this report, and any associated correspondence, are provided in the context of a preliminary audit of plans and other design documents. The report is intended to identify BCA or regulatory issues required to be addressed in the design to achieve compliance. It may not be construed to constitute involvement in building design, the preparation of plans and specifications, the provision of advice on how to amend a plan or specification, or to breach any other restriction or limitation imposed under the conflict of interest provisions of the above or any other legislation.

Limitations

The BCA report and associated compliance advice is not intended or permitted to be relied on by any other party with respect to their obligations to ensure compliance, including but not limited to the making of a compliance declaration under the NSW Design and Building Professionals Act.

Assumptions

Assumptions made in the preparation of this report are listed below:

1. The roof area is not accessible / occupiable
2. The fire isolated exits discharge outside the footprint of the building.
3. Areas marked ST within SOUs are storage areas thus not habitable;

Description of Proposed Development

The SSDA seeks development consent for the construction of a 100% affordable housing development on site R3 of the MGN Precinct.

Specifically, the SSDA seeks development consent for:

- Construction of two 3 to 9 storey residential flat buildings
- 130 dwellings, all of which are affordable housing
- One basement level of car parking
- Landscaping
- Communal open space area

The purpose of the project is to facilitate the delivery of high-quality affordable housing, on a strategically located site consistent with the vision for MGN.

MGN is located on Lot R3 – Goldsmith Avenue, Campbelltown



Assessment

The following is a summary of an assessment of the proposed design against the relevant Deemed-to-Satisfy provision of the BCA.

The BCA report and associated compliance advice is not intended or permitted to be relied on by any other party with respect to their obligations to ensure compliance including but not limited to the making of a compliance declaration under the NSW Design and Building Professionals Act.

Section A: General Provisions

The applicable BCA is Building Code of Australia 2022 Amendment 2. Under the BCA the premises are defined as one building required to be of Type A construction.

Section B: Structure

The structural engineering design of the building will be required to comply with the structural provisions of Part B of the BCA. Certification from a qualified structural engineer will need to be provided at Construction Certificate stage.

Section C: Fire Resistance

The premises are required to be Type A construction. Details of the proposed construction and how it will achieve the required FRL is to be provided. Certification from a structural engineer will be required for FRL's of all structural elements.

A substation located within a building or main switchboard that sustains emergency equipment must be separated from the remainder of the building by 2hr fire rated construction.

Switchboards sustaining emergency equipment must be constructed so that emergency equipment switchgear is separated from non-emergency equipment switchgear.

Residential public corridors exceed 40 m in length the maximum permitted under C3D15.

The top and bottom of all shafts must be enclosed by construction having a FRL. The garbage chute is not proposed to be isolated at the base / garbage room. Details of the roof access hatch should be assessed at CC stage, the stair / ladder may affect the corridor path of travel.

Bounding construction is required to be maintained to SOUs and public corridors. Lobbies on the ground level will not be separated.

Section D: Access and Egress

Egress is capable of complying with Clauses D2D5 and D2D6 of the BCA. The following areas will need to be addressed by a Performance Solution:

- The point of choice from which travel in different directions to two exits is available on the residential levels is up to 15 m.



- The travel distance to the nearest exit from the level 3 common areas exceed 20 m and is up to 23 m.

The discharge of fire isolated stairs require the path of travel to pass within 6 m of unprotected parts of the building.

The discharge of the tower stair fire isolated stairs is not as far apart as practical.

Rising and descending stairs are required to be smoke separated. This will be addressed by a Performance Solution.

Access for people with disabilities is to be provided in accordance with the provisions of Part D3 of the BCA and AS1428.1 – 2009. See Access report. The following is noted: -

- The number of accessible car parking spaces will be addressed by a Performance Solution.
- Access to the B1 residential units will be addressed by a Performance Solution.

Section E: Services and Equipment

The buildings are required to be served by a fire hydrant system complying with Clause E1.3 of the BCA and AS 2419.1 – 2005. Consideration is to be given to the location of the fire brigade booster assembly. Where located remotely from the buildings the booster assembly is required to be:

- At the boundary of the site and be within sight of the main entrance to the building;
- Adjacent to the principal vehicular access to the site;

This may be addressed as a Performance Solution.

EV charging and solar panels are a special hazard and requires a separate assessment from a Fire Engineer

The building is required to be provided with the services and equipment set out in Appendix B of this report. The annexure also outlines the standard of performance to be achieved by the services and equipment. The fire safety schedule may need to be amended subject to the inclusion of a fire engineered performance solution.

Performance Solutions are proposed for the following issues: -

- It is proposed not to sprinkler protect the main switch room
- The basement levels of rising and descending stairs will not be pressurised.
- It is proposed not to sprinkler protect the main switch room

Section F: Health and Amenity

External wall claddings which are not captured under Clause F3D5 will require a performance solution to be documented by an appropriately qualified practitioner in accordance with *Clause A2G2 - Performance Solution*.

Minimum ceiling heights are to be 2.4m except where 2.1m is permitted in corridors, passageways, bathrooms, sanitary compartments, storerooms or the like. Additional requirements are imposed by SEPP under the Good housing guide.



Natural lighting and ventilation is required to all habitable rooms as defined by the BCA.

Facilities for the preparation of food including a kitchen sink, bath or shower, closet pan, wash basin and cloths washing and drying facilities including a separate washtub in accordance with F4D2 are required.

Section J: Energy Efficiency

The buildings are to be designed to achieve compliance with the relevant provisions of Part J1 to J8 respectively. Further BASIX requirements apply.

Performance Solutions required

It is proposed to investigate satisfying the following non-compliances via performance solutions. The issues should be referred to the relevant consultant:

Item	Non-Compliance	DTS Clause	Performance Requirement	Description
1.	Bottom of garbage chute is not enclosed at basement 1 level	C2D2, S5C8	C1P2 C1P8	The top and bottom of all shafts must be enclosed by construction having a FRL. The garbage chute is not.
2.	Residential public corridors are 42 m in length	C3D15	E2P2	Residential public corridors must be separated by smoke proof construction to not more than 40 m in length
3.	Ground floor lobby areas will not be separated by construction having a FRL.	C4D12	C1P2 E2P2	Bounding construction must be maintained between SOUs and public corridors
4.	Travel distance	D2D5	D1P4 E2P2	The following issues are identified - On Residential level Travel to a point of choice is over 6 m being up to 15 m - On Residential level travel from the common areas to an exit is over 20 m being up to 23 m
5.	Discharge from exits	D2D12	C1P2 E2P2	The discharge of fire isolated stairs require travel within 6 m of unprotected parts of the building
6.	Discharge from exits	D2D15	D1P5 E2P2	The discharge of fire isolated stairs is not as far apart as practical
7.	Rising and descending stairs	D3D5	D1P4	Rising and descending stairs are required to be smoke separated.
8.	It is proposed not to sprinkler protect the main switch room	E1D4	E1P4	All parts of the building are required to be sprinkler protected
9.	The basement levels of rising and descending stairs will not be pressurised.	E2D4	E2P2	The whole of a fire isolated stair is required to be pressurised
10.	Provisions of special hazards	E2D21 E1D17	E2P2	The following matters are a special hazard and requires a separate assessment from a fire engineer:- - EV charging within the car park - Solar panels and batteries



Item	Non-Compliance	DTS Clause	Performance Requirement	Description
11.	Access to and throughout premises	Part D4		Access is required throughout. Consultation with the access consultant is required. The number of accessible car parking spaces will be addressed by a Performance Solution
12.	Deemed-to-Satisfy Provisions	F1D1		A test report on the proposed wall system is to be provided. The test report must include the following information: (i) Name and address of the person supervising the test. (ii) Test report number. (iii) Date of the test. (iv) Cladding manufacturer's name and address. (v) Construction details of the test specimen, including a description, and drawings and details of the components, showing modifications, if any. (vi) Test sequence with the pressures used in all tests. (vii) For each of the static and cyclic pressure tests, full details of all leakages, including position, extent and timing.

Conclusion

This report documents a preliminary audit of the proposed design against the BCA and the relevant legislative requirements for the issue of a Construction Certificate.

We confirm the proposed design, as shown on the drawings referenced in Appendix A, is capable of achieving compliance with the BCA. The proposed design will therefore be capable of being approved under a Construction Certificate, subject to the provision of further details regarding performance-based solutions and other documentation necessary to satisfy the relevant legislative requirements.



Appendix A – Referenced Documentation

The following documentation was used in the preparation of this report:

Drawing No.	Title	Issue	Date	Drawn By
DA100	Site and location plan	A	19/06/2026	DKO Architecture
DA200	Basement 1 plan	C	19/06/2026	DKO Architecture
DA201	Ground Floor plan	C	19/06/2026	DKO Architecture
DA202	Level 1 plan	C	19/06/2026	DKO Architecture
DA203	Level 2 plan	C	19/06/2026	DKO Architecture
DA204	Level 3 plan	B	19/06/2026	DKO Architecture
DA205	Level 4- level 5	B	19/06/2026	DKO Architecture
DA206	Level 6 plan	B	19/06/2026	DKO Architecture
DA207	Level 7 plan	B	19/06/2026	DKO Architecture
DA208	Level 8 plan	C	19/06/2026	DKO Architecture
DA300	North and South Elevations	B	19/06/2026	DKO Architecture
DA301	East and West Elevations	C	19/06/2026	DKO Architecture
DA302	Internal Elevations	C	19/06/2026	DKO Architecture
DA303	Section A & B	B	19/06/2026	DKO Architecture
DA304	Section C & D	B	19/06/2026	DKO Architecture



Appendix B – Schedule of proposed statutory Fire Safety Measures

Schedule of Statutory Fire Safety Measures

Measure	Standard of Performance
Access Panels, Doors And Hoppers To Fire Resisting Shafts	BCA 2022 Amendment 2 Clause C4D14 and tested prototypes (AS 1530.4 - 2014)
Automatic Fail Safe Devices	Scheduled devices release upon trip of smoke detection, fire detection and sprinkler activation in accordance with BCA 2022 Amendment 2 Clause D3D26.
Automatic Fire Detection And Alarm System (<i>Smoke Detection System</i>)	BCA 2022 Amendment 2 S20C4 and AS 1670.1 - 2018
Automatic Fire Detection And Alarm System (<i>Smoke Alarm System</i>)	BCA 2022 Amendment 2 S20C3 and AS 3786 - 2014
Automatic Fire Detection And Alarm System (<i>Smoke Detection System To Automatically Shutdown Air-Handling System</i>)	BCA 2022 Amendment 2 S20C6 and AS 1670.1 - 2018
Automatic Fire Suppression Systems (<i>Sprinklers</i>)	BCA 2022 Amendment 2 Specification 17 and AS 2118.1 - 2017
Automatic Fire Suppression Systems (<i>Combined Sprinkler And Hydrant System</i>)	BCA 2022 Amendment 2 Specification 17 and AS 2118.6 - 2012
Building Occupant Warning System	BCA 2022 Amendment 2 S20C7 and AS 1670.1 - 2018
Emergency Lifts	BCA 2022 Amendment 2 Clause E3D5
Emergency Lighting	BCA 2022 Amendment 2 Clause E4D2, E4D4 and AS/NZS 2293.1 - 2018
Emergency Warning And Intercommunication System	BCA 2022 Amendment 2 Clause E4D9, Specification 31 and AS 1670.4 - 2018
Exit Signs	BCA 2022 Amendment 2 Clause E4D5, NSW E4D6, E4D7, E4D8 and AS/NZS 2293.1 - 2018
Fire Alarm Monitoring System	BCA 2022 Amendment 2 S20C8 and AS 1670.3 - 2018
Fire Control Room	BCA 2022 Amendment 2 Specification 19
Fire Dampers	BCA 2022 Amendment 2 Clause C4D15 and AS 1668.1 - 2015 (AS 1682.1 - 2015 and AS 1682.2 - 2015)
Fire Doors	BCA 2022 Amendment 2 Specification 12 and AS/NZS 1905.1 - 2015
Fire Engineering Report	TBC
Fire Hydrants Systems	BCA 2022 Amendment 2 Clause E1D2 and AS2419.1-2021
Fire Seals Protecting Opening In Fire Resisting Components Of The Building	BCA 2022 Amendment 2 Clause C4D15, Specification 13, AS 1530.4 - 2014, AS 4072.1 - 2005 and installed in accordance with the tested prototype.
Hose Reel System	BCA 2022 Amendment 2 Clause E1D3 and AS 2441 - 2005
Lightweight Construction	BCA 2022 Amendment 2 Specification 6, Clause A2G3 and AS 1530.4 - 2014



Measure	Standard of Performance
Mechanical Air Handling System (<i>Automatic Shut Down Of Air-Handling System</i>)	BCA 2022 Amendment 2 Clause E2D3 and AS 1668.1 - 2015
Mechanical Air Handling System (<i>Automatic Air Pressurisation System</i>)	BCA 2022 Amendment 2 Clause E2D4, E2D8, E2D9 and AS 1668.1 - 2015
Mechanical Air Handling System (<i>Carpark Mechanical Ventilation System</i>)	BCA 2022 Amendment 2 Clause E2D12, Clause 5.5 of AS/NZ 1668.1 - 2015 and fans with metal blades suitable for operation at normal temperature may be used and the electrical power and control cabling need not be fire rated
Portable Fire Extinguishers	BCA 2022 Amendment 2 Clause E1D14 and AS 2444 - 2001
Warning And Operational Signs	BCA 2022 Amendment 2 Clauses C4D7, D2D22, NSW D3D24, D3D28, D4D7 E3D4, E3D11, E3D12 and NSW I4D14 and Specification 14, E1D15



Appendix C – Fire-resistance levels

Table 1 S5C11a: Type A construction: FRL of loadbearing parts of external walls

Distance from a <i>fire-source feature</i>	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	Class 2, 3 or 4 part	Class 5, 7a or 9	Class 6	Class 7b or 8
Less than 1.5 m	90/90/90	120/120/120	180/180/180	240/240/240
1.5 to less than 3 m	90/60/60	120/90/90	180/180/120	240/240/180
3 m or more	90/60/30	120/60/30	180/120/90	240/180/90

Table 2 S5C11b: Type A construction: FRL of non-loadbearing parts of external walls

Distance from a <i>fire-source feature</i>	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	Class 2, 3 or 4 part	Class 5, 7a or 9	Class 6	Class 7b or 8
Less than 1.5 m	–/90/90	– /120/120	– /180/180	–/240/240
1.5 to less than 3 m	–/60/60	–/90/90	– /180/120	–/240/180
3 m or more	–/–/–	–/–/–	–/–/–	–/–/–

Table 3 S5C11c: Type A construction: FRL of external columns not incorporated in an external wall

Column type	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	Class 2, 3 or 4 part	Class 5, 7a or 9	Class 6	Class 7b or 8
Loadbearing	90/–/–	120/–/–	180/–/–	240/–/–
Non-loadbearing	–/–/–	–/–/–	–/–/–	–/–/–

Table 4 S5C11d: Type A construction: FRL of common walls and fire walls

Wall type	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	Class 2, 3 or 4 part	Class 5, 7a or 9	Class 6	Class 7b or 8
Loadbearing or non-loadbearing	90/90/90	120/120/120	180/180/180	240/240/240

**Table 5 S5C11e: Type A construction: FRL of loadbearing internal walls**

Location	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	Class 2, 3 or 4 part	Class 5, 7a or 9	Class 6	Class 7b or 8
Fire-resisting lift and stair shafts	90/90/90	120/120/120	180/120/120	240/120/120
Bounding public corridors, public lobbies and the like	90/90/90	120/-/-	180/-/-	240/-/-
Between or bounding sole-occupancy units	90/90/90	120/-/-	180/-/-	240/-/-
Ventilating, pipe, garbage, and like shafts not used for the discharge of hot products of combustion	90/90/90	120/90/90	180/120/120	240/120/120

Table 6 S5C11f: Type A construction: FRL of non-loadbearing internal walls

Location	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	Class 2, 3 or 4 part	Class 5, 7a or 9	Class 6	Class 7b or 8
Fire-resisting lift and stair shafts	-/90/90	- /120/120	-120/120	-/120/120
Bounding public corridors, public lobbies and the like	-/60/60	-/-/-	-/-/-	-/-/-
Between or bounding sole-occupancy units	-/60/60	-/-/-	-/-/-	-/-/-
Ventilating, pipe, garbage, and like shafts not used for the discharge of hot products of combustion	-/90/90	-/90/90	- /120/120	-/120/120

Table 7 S5C11g: Type A construction: FRL of other building elements not covered by Tables S5C11a to S5C11f

Building element	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	Class 2, 3 or 4 part	Class 5, 7a or 9	Class 6	Class 7b or 8
Other loadbearing internal walls, internal beams, trusses and columns	90/-/-	120/-/-	180/-/-	240/-/-
Floors	90/90/90	120/120/120	180/180/180	240/240/240
Roofs	90/60/30	120/60/30	180/60/30	240/90/60



Appendix D2D5 - Exits

The exits from the building are set out below:

Exit No	Location	Type	Grid Ref	No of storeys connected / passed by	Comments
1.	Basement stair east	Fire isolated	--	2	Compliant discharge paths are proposed
2.	Basement stair west	Fire isolated scissor stair	--	2	Compliant discharge paths are proposed
3.	Basement stair west	Fire isolated scissor stair	--	2	Compliant discharge paths are proposed
4.	East tower stair 1 A	Fire isolated scissor stair	--	8	Compliant discharge paths are proposed
5.	East tower stair 1 B	Fire isolated scissor stair	--	8	Compliant discharge paths are proposed
6.	west tower stair 2 A	Fire isolated scissor stair	--	8	Compliant discharge paths are proposed
7.	West tower stair 2 B	Fire isolated scissor stair	--	8	Compliant discharge paths are proposed
8.	Pump room stair / passage	Fire isolated	--	1	Serves pump room and southwest basement 1
9.	B1 residential passage /door	Door	--	1	Door serving B1 SOUs
10.	West lobby	Main entry exit	--	1	Main entry / egress
11.	East lobby	Main entry exit	--	1	Main entry / egress