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DEVELOPMENT APPLICATION FIRE ENGINEERING LETTER OF INTENT

To:	Department of Planning, Housing and Infrastructure	Project:	149665.00
Date:	29 August 2025	Version:	B
Subject:	363-373 Victoria Road & 44-48 Eltham Street, Gladesville, NSW		

1 INTRODUCTION

This Development Application Statement of Intent prepared by Holmes Australia is submitted on behalf of Fabcot Pty Ltd to the Department of Planning, Housing and Infrastructure (DPHI) in support of a State Significant Development Application (SSDA) for a mixed-use development, located at 363-373 Victoria Road & 44-48 Eltham Street, Gladesville.

The SSDA seeks approval for:

- Demolition of all existing improvements and structures on the site
- Construction of a part three (3), part eight (8), and part 13 storey mixed use building.
- Construction of a four (4) storey basement (inclusive of Lower Ground) basement for parking and servicing, with vehicle access from Eltham Street
- Landscaping and public domain works
- Extension and augmentation of services and infrastructure as required

For a further detailed project description, please refer to the Environmental Impact Statement prepared by Beam Planning.

This report should be read in conjunction with the Environmental Impact Statement prepared by Beam Planning, the Architectural Plans prepared by Clarke Hopkins Clarke, and the other accompanying technical documents that form part of the State Significant Development Application.

1.1 The Site

The site is located at 363-373 Victoria Road & 44-48 Eltham Street, Gladesville. It is situated within the City of Ryde Local Government Area (LGA), as shown in Figure 1-1.

The site has three frontages on three primary roadways, being Victoria Road to the south-west, Westminster Road to the south-east, and Eltham Street to the north-east. The total site area is approximately 5,600 m^2.

Figure 1-1: Proposed Site

A Building Code of Australia, 2022 Amendment 2 (BCA)[1] assessment has been undertaken by Holmes against the Deemed-to-Satisfy Provisions of Sections C, D (excluding Part D4), E, and Parts G3 and G6 (excluding part F and NSW Part H101), dated 29 August 2025. This report identified a number of non-compliances with the Deemed-to-Satisfy Provisions of the BCA that will be addressed by Holmes using fire engineered Performance Solutions.

2 PROPOSED PERFORMANCE SOLUTIONS

Holmes will address the identified non-compliances using performance-based fire engineering solutions. The performance-based solutions will comply with the relevant Performance Requirements of the BCA. The

[1] Australian Building Codes Board, National Construction Code Series 2022 Amendment 2, Volume 1, Building Code of Australia, Class 2 to Class 9 Buildings. Australian Building Codes Board, CAN, Australia, 2025.

design approach will be in line with the Australian Fire Engineering Guidelines[2] and other acceptable guideline documents.

The Performance Solution designs will be developed in line with BCA Clause A2G2, as applicable; i.e. complying with the relevant Performance Requirements or by equivalence comparison with the Deemed-to-Satisfy Provisions.

The identified non-compliances and proposed approach of the Performance Solution for each issue is listed below. Holmes understands that all other aspects of the building will comply with the Deemed-to-Satisfy Provisions of the BCA.

1. BCA Clauses C2D2 and S5C8 require fire-rated shafts to be enclosed at the top and bottom by construction having an FRL not less than that required for the walls of a non-loadbearing shafts in the same building, being -/90/90 in Class 2 and Class 7a areas and -/120/120 in Class 7b areas. The building is proposed to incorporate garbage chutes in the residential levels with the bottom located within the residential bin rooms on Basement Level 2. The garbage chutes are not provided with a fire rated base as required by the Clause as they open into the room. A Performance Solution using a comparative approach will be provided to address Performance Requirement C1P2.
2. BCA Clause C2D2, C3D9, C3D10, and S5C11 require storage areas to be fire separated from the remainder of the building by fire rated construction achieving a Fire Resistance Level (FRL) of (240)/240/240 (or the entire storey shall be constructed to achieve this FRL). Basement Level 2 comprises Class 7b storage and Class 7a carparking. It is proposed to not provide FRLs of (240)/240/240 to the storage or Basement Level 2 as a whole. A Performance Solution can be developed to rationalise the FRLs of the storage component. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P1 and C1P2
3. BCA Clause C2D2, C3D9, and S5C11 require retail areas to be fire separated from the remainder of the building by fire rated construction achieving a Fire Resistance Level (FRL) of (180)/180/180 (or the entire storey shall be constructed to achieve this FRL). The Ground Floor supermarket will feature a set of moving walkways and escalators considered as Class 6 areas connecting Basement Level 1, Lower Ground and Ground Level. The lobbies separating the moving walkways from the Class 7a carpark areas are proposed to comprise of glazed walls and doors which will not achieve an FRL of (180)/180/180. A Performance Solution can be developed to protect the glazing with wall wetting sprinklers on the carpark side. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P1 and C1P2.
4. BCA Clause C2D2 and S5C16 requires roof lights installed in a roof required to have an FRL to be not less than 3 m from any part of the building which projects above the roof unless that part has the FRL required of a fire wall, and any openings in that part of the wall for 6 m vertically above the roof light or the like, are protected in accordance with C4D5. The building is proposed to have roof lights in the roof/ceiling of Level 2 that will be within 3 m from the external walls of some residential

[2] Australian Building Codes Board, "Australian Fire Engineering Guidelines," Australian Building Codes Board, Canberra, 2021.

SOUs on Level 3. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P1 and C1P2

5. BCA Clause C3D15 requires that public corridors exceeding 40 m in length are required to be separated at intervals of no greater than 40 m with smoke-proof walls complying with S11C2. A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P4 and E2P2 to allow for a corridor of approximately 47 m in length which is not sub-divided on Level 2 of Building B.
6. BCA Clause C4D6 and S12C5 require that doorways or shutters in fire walls achieve the same FRL as the fire wall except that the door or shutter must have an insulation level of at least 30. It is unlikely that the fire shutter separating the Class 7b loading dock from the Class 6 retail fire compartments will achieve the required insulation rating. A Performance Solution using an absolute approach will be provided to address Performance Requirement C1P2.
7. BCA Clause S12C4 requires that where smoke doors are provided within smoke proof residential corridors, that the doors swing in the direction of egress. A Performance Solution using an absolute approach will be provided to allow for the smoke doors within the residential corridors of Buildings A and B to swing in a single direction. Performance Requirement D1P2 will be addressed.
8. BCA Clause D2D3 requires a building with an effective height of more than 25 m to be provided with two exits on each storey where a storey does not have direct egress to open space. The Building B Level 3 plant area is only provided with a single exit. A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P4 and E2P2.
9. BCA Clause D2D5, D2D6 and G6D4 requires the travel distances to be as follows:
    - In Class 2 residential areas: 6 m to a Point of Choice (PoC) of exits from SOU entry door or 20 m from a single exit serving the storey at a level of egress to a road or open space. The travel distance in Class 2 buildings from an area not in an SOU must not be more than 20 m from an exit or point of choice. Travel distances between alternate exits in Class 2 areas are not to exceed 45 m
    - In Class 6, 7a or 7b areas: Travel distance to an exit is not permitted to exceed 20 to a single exit or a point of choice (POC), and 40 m to one of two exits. Class 6 parts at a storey at the level of access to a road or open space may be increased to 30 m to a single exit. Travel distances between alternate exits are not to exceed 60 m.

Travel distances are exceeded in the following areas:

- Basement 3 carpark, distance to an exit is up to 42 m;
- Basement 2 storage, distance to an exit is up to 50 m and distance to a point of choice is 25 m;
- Basement 2 carpark, distance to an exit is up to 45 m;
- Lower Ground carpark to an exit is up to 45 m;
- Ground Floor supermarket, distance to an exit is up to 51 m;
- Ground Floor loading dock, distance to an exit is up to 47 m;
- Basement 3, carpark areas are up to ~90 m between alternate exits;

- Basement 2 and Lower Ground carpark areas are up to ~75 m between alternate exits;
- Basement 1, carpark areas are up to ~77 m between alternate exits;
- Ground Floor retail areas are up to ~84 m and in the loading dock are up to ~94 m between alternate exits;
- Residential Building A Level 1 distance to a point of choice is 10 m;
- Residential Building A Level 2 to Level 12, distance to a point of choice is 16 m;
- Residential Building B Level 2 to Level 4, distance to a point of choice is 7 m; and
- Level 1 Class 2 residential / communal area are up to ~92 m between alternate exits.

A Performance Solution using a comparative or absolute approach will be provided to address Performance Requirements D1P4 and E2P2.

10. BCA Clause D2D8 requires a minimum unobstructed exit width depending on the number of occupants accommodated in the storey. If the storey accommodates more than 200 occupants, the aggregate exit width from the storey must be in accordance with a specific formula. The supermarket is estimated to accommodate approximately 1,200 persons and therefore is expected to require an aggregate egress width of 9 m. A Performance Solution using an absolute approach will be provided to address Performance Requirements D1P4 and E2P2 to allow for approximately 5 m of aggregate egress width.
11. BCA Clause D2D12(1) requires that a doorway from a room must not open directly into a fire-isolated stairway unless it is an SOU occupying the whole storey. The door from the supermarket retail area and Loading dock bin storage area opens directly into the fire stair on the Ground Floor. A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P5 and E2P2.
12. BCA Clause D2D12(2) requires fire-isolated stairways to be provided with independent egress from each storey served and discharge directly, or by way of its own fire-isolated passageway. The northeastern and the southern fire-isolated stairs serving Building B discharge to Level 1 podium from where occupants must traverse the podium and then then enter another stairway (either western stair from podium to Ground Floor and Eltham Street, or a Building A fire-stair). A Performance Solution using a comparative approach will be provided to address Performance Requirement D1P5.
13. BCA Clause D2D12(2) requires fire-isolated stairways to be provided with independent egress from each storey served and discharge directly, or by way of its own fire-isolated passageway to a point within the confines of the building that is open for at least 2/3 of its perimeter and from which an unimpeded path of travel of up to 20 m is available to open space. The following stairways discharge into covered areas not complying with these requirements:
    - Fire stair serving the northern eastern end of the car park and Building B (Westminster Street frontage);
    - The northwestern fire stair serving Building B discharging to Level 1 podium; and
    - The southern fire stair serving Building B discharges to Level 1 internal residential corridor.

A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P5 and E2P2.

14. BCA Clause D2D12(3) requires openings within 6 m of the path of travel from the discharge of a fire-isolated stair to the road or open space to be protected in accordance with BCA Clause C4D5. The southern fire stair serving Building B discharges to Level 1 residential corridor, the path of travel from the point of discharge is within 6 m of the SOU openings in B-104 and B-108 that are proposed to be unprotected. A Performance Solution using an absolute approach will be provided to address Performance Requirement D1P5.
15. BCA Clause D3D13 requires the roof to have an FRL of not less than 120/120/120 if an exit discharges to the roof and not have any roof lights or other openings within 3 m of the path of travel. The podium level is considered to be a roof as open space (fire-isolated stairs discharge to this space). Whilst the podium is generally capable of achieving the required FRL, it is expected that there will be openings including drainage and potentially smoke exhaust which are within 3 m of the paths of travel across the podium. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P2 and D1P5.
16. BCA Clause D3D25 requires doors which are part of exits to swing in the direction of egress. The Building B southern fire-isolated stair discharges at Level 1 and therefore the door should be re-swung outwards in the direction of travel if possible. However, a Performance Solution using an absolute approach may be provided to address Performance Requirement D1P2 if this is not possible owing to space constraints.
17. BCA Clause E2D4 requires fire-isolated stairways serving any storey above an effective height of 25 m or more than 2 below ground storeys, not counted in the rise in storeys, to be provided with either an automatic air pressurisation system throughout the exit in accordance with AS 1668.1 or open access ramps or balconies. The fire-isolated stairs serving the basement levels effectively have four levels within the compartment and are therefore not expected to achieve an air velocity of at least 1 m/s through doors whilst doors on four levels (plus the discharge level) are open. A Performance using an absolute approach will be provided to address Performance Requirement E2P2 allowing for the velocities to be achieved with two levels (plus the discharge level) open.
18. BCA Clause E2D6 requires that where a building is greater than 25 m in effective height and where there are classifications other than Class 2, 3, 9a or 9c, the building is required to be provided with a zone smoke control system. A Performance Solution using a comparative approach will be provided to address Performance Requirement E2P2 to omit the provision of a zone pressurisation system within the building.
19. BCA Clause E2D15 requires fire compartments with Class 6 parts that are more than 2,000 m^2 and containing an enclosed common walkway or more than one Class 6 SOU, to be provided with an automatic smoke exhaust system complying with Specification 21. A Performance Solution using an absolute approach will be provided to address Performance Requirement E2P2 to rationalise the capacity of the smoke exhaust system for the Class 6 retail parts utilising fire and egress modelling.
20. BCA Clause E1D4 and S17C6 requires that sprinkler alarm valves must be located in a secure room or enclosure which has direct egress to a road or open space. The valve enclosure room will not have direct egress to a road or open space as it will likely be via a lobby and fire-isolated stairway. A Performance using an absolute approach will be provided to address Performance Requirement E1P4.

21. BCA Clause J9D4 requires electrical distribution boards dedicated to electric vehicle charging sized to support 100% of residential spaces and 10% of retail spaces and BCA Clause J9D5 requires the main electrical switchboard to support the installation of PV panels. Therefore, it is understood that the building may incorporate EV charging stations. PV panels are provided on the Building A roof. EV charging stations are considered special hazards and PV (solar) panels are considered hazards due to the risks associated with potential fires and hence must be assessed. Holmes will include a Hazard Assessment to demonstrate suitable provisions are made for these hazards.

3 SUMMARY

Based on Holmes's review of the project documentation, it is considered that performance based fire engineering can be utilised to demonstrate compliance with the Performance Requirements of the BCA without major changes to the current design. Should additional non-compliances be identified as the design is further developed, Holmes and the design team are confident that these will be resolved wither through Deemed-to-Satisfy compliant solutions or Performance Solutions.

The information contained within this letter is based on the architectural drawings prepared by Clarke Hopkins Clarke, as listed below.

Dwg no.	Title	Date	Issue
DA-096	FLOOR PLAN - BASEMENT 3	26.08.2025	P7
DA-097	FLOOR PLAN - BASEMENT 2	26.08.2025	P7
DA-098	FLOOR PLAN - BASEMENT 1	26.08.2025	P8
DA-099	FLOOR PLAN - LOWER GROUND-UNDERCROFT	26.08.2025	P7
DA-100	FLOOR PLAN - GROUND FLOOR	26.08.2025	P8
DA-101	FLOOR PLAN - LEVEL 1	26.08.2025	P9
DA-102	FLOOR PLAN - LEVEL 2	26.08.2025	P8
DA-103	FLOOR PLAN - LEVEL 3	26.08.2025	P8
DA-104	FLOOR PLAN - LEVEL 4	26.08.2025	P8
DA-105	FLOOR PLAN - LEVEL 5	26.08.2025	P8
DA-106	FLOOR PLAN - LEVEL 6 TO 7	26.08.2025	P8
DA-108	FLOOR PLAN - LEVEL 8	26.08.2025	P8
DA-109	FLOOR PLAN - LEVEL 9 TO 12	26.08.2025	P8
DA-113	ROOF PLAN	26.08.2025	P6
DA-200	NORTH ELEVATION	26.08.2025	P2
DA-201	EAST ELEVATION	26.08.2025	P2
DA-202	SOUTH ELEVATION	26.08.2025	P2
DA-203	WEST ELEVATION	26.08.2025	P2

Dwg no.	Title	Date	Issue
DA-300	SECTION SHEET 1	26.08.2025	P2
DA-301	SECTION SHEET 2	26.08.2025	P2
DA-302	SECTION SHEET 3	26.08.2025	P2

Please do not hesitate to contact Holmes, should there be any queries about the above.

Regards,

Richard Green
Project Director
Registered Certifier – Fire Safety (BDC05153)