



# BCA (BUILDING CODE OF AUSTRALIA) CAPABILITY STATEMENT REPORT

**CLIENT:** MING YANG AND JOHN WU, 16-20 MIDDLE HARBOUR ROAD, LINDFIELD

**PROJECT NAME:** RESIDENTIAL APARTMENT DEVELOPMENT

**PROJECT ADDRESS:** 16-20 MIDDLE HARBOUR ROAD, LINDFIELD

**DATE:** 5 AUGUST 2025

**PROJECT NO:** 250393

## CONTENTS

1.0	EXECUTIVE SUMMARY .....	3
2.0	INTRODUCTION .....	5
2.1	BACKGROUND.....	5
2.2	SUBJECT SITE.....	6
2.3	SURROUNDING CONTEXT .....	6
2.4	PURPOSE OF THE REPORT.....	7
2.5	PROJECT TEAM.....	7
2.6	BASIS OF THE REPORT.....	7
3.0	BCA ASSESSMENT DATA.....	8
3.1	BUILDING CLASSIFICATION .....	8
3.2	LOCATION OF FIRE-SOURCE FEATURES .....	8
4.0	BCA ASSESSMENT – KEY REQUIREMENTS.....	9
	SECTION B: STRUCTURE .....	10
	SECTION C: FIRE RESISTANCE .....	10
	SECTION D: ACCESS AND EGRESS.....	14
	SECTION E: SERVICES AND EQUIPMENT.....	19
	SECTION F: HEALTH AND AMENITY .....	21
	SECTION G: ANCILLARY PROVISIONS.....	22
	SECTION I: SPECIAL USE BUILDINGS.....	23
	SECTION J: ENERGY EFFICIENCY .....	23
5.0	CONCLUSION .....	24
6.0	APPENDIX – REFERENCED DOCUMENTATIONS .....	25
6.1	ARCHITECTURAL AND SERVICE PLANS.....	25
6.2	SPECIFICATION 7 (TABLES S7C3, S7C4, AND NSW S7C7) .....	27

## DOCUMENT CONTROL

REVISION NO.	ISSUE DATE	DESCRIPTION	PREPARED BY	VERIFIED BY
R01	30 July 2025	DRAFT BCA Report	Therese Yap Administrative Assistant	Roland Allam Director
R01	05 August 2025	Final BCA Report	Therese Yap Administrative Assistant	Roland Allam Director / Building Regulations Consultant Masters in Building Surveying, WSU Bachelor of Civil Engineering with Architecture, UNSW Building Surveyor - Unrestricted (BDC 3372)

## 1.0 EXECUTIVE SUMMARY

This BCA Capability Statement Report has been prepared by AllCert Pty Ltd for Ming Yang and John Wu (the applicant) to accompany an Environmental Impact Statement (EIS) for a proposed residential flat building (RFB), including in-fill affordable housing, at 16-20 Middle Harbour Road, Lindfield, within the Ku-ring-gai Local Government Area (LGA).

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-83431958) on 5 May 2025.

Following our detailed assessment of the architectural documentation, a summarised list of non-compliances are listed in the table below. There are various compliance pathways to achieve compliance with the Performance Requirements of the BCA. Our suggested resolution approach is provided against each non-compliance for consideration.

Table 1: BCA matters to be addressed

<b>MATTERS UNDER "PS" (PERFORMANCE SOLUTION)</b>			
<i>A performance solution is proposed or recommended to achieve BCA compliance in lieu of adherence to the subject deemed-to-satisfy clause.</i>			
<b>ITEM NO.</b>	<b>BCA CLAUSE</b>	<b>RELEVANT DEEMED-TO-SATISFY REQUIREMENTS</b>	<b>PROPOSED PATHS TO COMPLY</b>
1	C3D8, C3D9, C3D10	<ol style="list-style-type: none"> <li>The Lower Ground Floor contains a Class 7b component (waste rooms), which is subject to a higher fire resistance requirement of 240 minutes</li> <li>An opening exists between the loading bay and Waste Room 1 on the Lower Ground Floor. This opening is to be fire separated via a fire-rated roller shutter.</li> </ol>	<ol style="list-style-type: none"> <li>A Performance Solution will be required to rationalise this FRL from 240 minutes down to 120 minutes. This rationalisation will also apply to the floor separating the Lower Ground Floor and the Upper Ground Floor.</li> <li>The adequacy of this separation is also to be addressed through a Performance Solution at the CC stage.</li> </ol>
2	D2D3	The services room on the Lower Ground Floor is provided with direct egress to open space, however, the travel distance is up to 29 m, which exceeds the 20 m limit permitted under Clause D2D5 for areas served by a single exit.	A Performance Solution will be required to justify the extended travel distance to open space.
3	D2D5	<ol style="list-style-type: none"> <li>The services room on the Lower Ground Floor is provided with direct egress to open space, however, the travel distance is up to 29 m, which exceeds the 20 m limit</li> <li>The loading bay on the Lower Ground Floor (RL84.4) has direct access into the service corridor (RL 84.4). Access is required for persons in the loading bay and connecting driveways to have access to the exits serving the remainder of the storey. Extended travel distances exit in the driveways as follows: Up to 22m to a point of choice from the motorised basement entry gate. Note the first path of travel is through the loading bay to the exit closest to the indoor lap pool, and the second path will be down the driveway to the closest fire stair on Basement 1.</li> <li>On levels 2 to 4, the travel distance to the exit (fire-stair) from sole-occupancy units 201, 214, 301, 314, 401, 412 exceed 6m, measured up to 7.5m. A Performance</li> </ol>	<ol style="list-style-type: none"> <li>A Performance Solution will be required to justify the extended travel distance to open space.</li> <li>A Performance Solution will be required to justify the extended travel distances.</li> <li>A Performance Solution will be required to justify the extended travel distance at the residential levels.</li> <li>A review of the travel distances will be required as the design develops at the CC stage and a performance solution required to address this issue.</li> </ol>

		<p>Solution will be required to justify the extended travel distance at the residential levels.</p> <p>4. Level 9 (Roof Terrace) is provided with a single exit with travel distances to that exit measured up to 36m in lieu of 20m. The architect has confirmed that this part of Level 9 will be used for non-residential purposes (i.e. used to contain AC condensers).</p>	
4	D2D6	<p>1. The distance between alternative exits on Basement Levels 1, 2, and 3 exceeds the 60 m maximum prescribed by NCC Clause D2D6. The maximum measured distance is approximately 65 m.</p> <p>2. On upper ground, the egress route to the road will involve the alternative paths of travel to converge such that they become less than 6m apart.</p>	<p>1. A Performance Solution will be required to justify this non-compliance.</p> <p>2. A Performance Solution will be required to justify this non-compliance.</p>
5	D2D12	<p>1. The services plant on Level 9 opens into the fire-stair and an airlock is not provided</p> <p>2. At Upper Ground / Level 1, both the fire-isolated stairways—serving the descending residential levels and ascending basement levels—discharge into a shared fire-isolated passageway, rather than providing independent discharge paths as required by Clause D2D12(2). This configuration does not comply with the Deemed-to-Satisfy provisions, which require each fire-isolated stairway or ramp to discharge directly to open space, or via its own fire-isolated passageway</p> <p>3. The fire-isolated passageway discharged into a covered area that does not have an unobstructed clear height throughout, including the perimeter openings, of not less than 3 m.</p>	<p>1. A performance solution will be required to address this non-compliance at the CC stage.</p> <p>2. A Performance Solution will be required to justify this non-compliance</p> <p>3. A Performance Solution will be required to justify this non-compliance</p>

## 2.0 INTRODUCTION

### 2.1 BACKGROUND

AllCert Pty Ltd have been commissioned by **MING YANG AND JOHN WU** to provide professional building code regulation advice relating to the design of the proposed development located at **16-20 MIDDLE HARBOUR ROAD, LINDFIELD**. The **RESIDENTIAL APARTMENT DEVELOPMENT** consists of a 9-storey residential flat building including 79 market residential units, 19 affordable housing units and ground floor common facilities and communal open space.

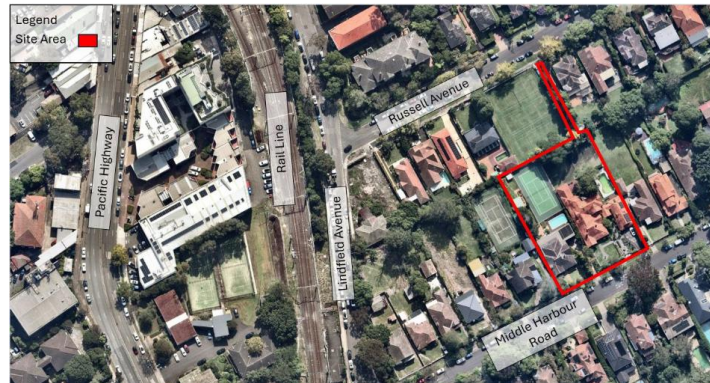


Figure 1: Site location (Source: Nearmap)



Figure 2: TOD Map (Source: ESpatial Viewer)

The State Significant Development (SSD) application seeks consent for the demolition of existing dwellings at 16-20 Middle Harbour Road, Lindfield, to facilitate a residential flat building (RFB).

Specifically, the SSD seeks consent for:

- demolition of existing structures at the site;
- construction of a 9-storey residential flat building including:
  - 79 market residential units;
  - 19 affordable housing units; and
  - ground floor common facilities/communal open space;
- 3 levels of basement car parking;
- associated infrastructure and services; and
- landscaping.

The proposal incorporates over 17% affordable housing and seeks to utilise the incentive controls under Chapter 2, Part 2, Division 1, Section 16 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) to achieve 30% uplift in height and floor space ratio (FSR).

## 2.2 SUBJECT SITE

The site is located at 16-20 Middle Harbour Road, Lindfield, within the Ku-ring-gai Local Government Area (LGA). It is legally described as 16 Middle Harbour Road (Lot 1 DO 569232) and 18 – 20 Middle Harbour Road (Lots 10 and 11 DP5374 and Lot 1 DP 983946).

The site is currently occupied by two detached dwellings, with vehicle access provided via Middle Harbour Road. An access handle forms part of 18-20 Middle Harbour Road which connects the site to Russell Avenue, however, this currently provides no vehicle access.

The site is generally rectangular in shape, with the exception of the access handle at 18-20 Middle Harbour Road.

The site is zoned R2 Low Density Residential under the Ku-ring-gai Local Environmental Plan 2015 (KLEP 2015).

The site is located within the Lindfield Transport Oriented Development (TOD) precinct and therefore permissibility and applicable development standards are provided under Chapter 5 of the Housing SEPP.

The site does not contain any local heritage items nor is it located within a Heritage Conservation Area (HCA) under the KLEP 2015. The access handle of 18-20 Middle Harbour Road does adjoin an HCA.

Biodiversity value land is present at the site, with a small portion in the centre of the site identified on the 'Biodiversity Values land' mapping, pursuant to the Biodiversity Conservation Act 2016.

## 2.3 SURROUNDING CONTEXT

The site is surrounded by built and natural environment as follows:

- **North:** the site is immediately bounded by low density residential development and Lindfield Tennis Club, along with higher density development further north and Cromehurst School being located to the north-east
- **East:** Lower density residential uses directly adjoin the eastern boundary of the site with Roseville Park located further east on Chelmsford Avenue.
- **South:** Middle Harbour Road forms the site's southern boundary with low density residential dwellings along the southern side of the road.
- **West:** The site is bounded by low-medium residential uses, with the railway line and Pacific Highway located further to the west.

The surrounding locality is included below in Figure 3.



Figure 3: Site Context (Source: Nearmap)

## 2.4 PURPOSE OF THE REPORT

The purposes of this report are to:

- Evaluate whether the current design proposal can achieve compliance with the Building Code of Australia (BCA), in accordance with Section 19 of the Environmental Planning & Assessment (Development Certification & Fire Safety) Regulation 2021, as well as the Access Codes relevant to the Disability (Access to Premises-Buildings) Standards 2010 (the Access to Premises Standards).
- Confirm that the Development Application (DA) architectural documentation has been reviewed by a qualified Building Surveyor and an Accredited Certifier.
- Accompany the Development Application submission to assure the Consent Authority that compliance with the fire and life safety, as well as health and amenity requirements of the BCA, will not result in design changes to the building that would necessitate a Section 96 application under the Environmental Planning and Assessment Act 1979.

It should be noted that this report does not aim to identify all the BCA provisions applicable to the subject development. A more comprehensive assessment will be conducted upon receiving detailed documentation at the Construction Certificate stage.

## 2.5 PROJECT TEAM

The information and findings presented within this report was prepared by the following key personnel from AllCert:

- Roland Allam
- Therese Yap

## 2.6 BASIS OF THE REPORT

This report is based on:

- a) The architectural plans provided, as listed in the Appendix section
- b) Information provided by the client
  - *The information provided by the client is intended for their use only, and it is in the opinion of this office that the documentation provided sufficient information to allow a detailed BCA report to be produced*
- c) Building Code of Australia (BCA), in accordance with Section 19 of the Environmental Planning & Assessment (Development Certification & Fire Safety) Regulation 2021

It is important to note that for new building projects, the applicable version of the BCA is determined by the version in place at the time of lodging the Construction Certificate application with the Accredited Certifying Authority. Updates to the BCA typically occur on a three-year cycle, starting from May 1, 2016.

This report is for the exclusive use of the client and cannot be used for any other purpose without prior permission from AllCert Pty Ltd. The report is valid only in its entire form. 'AllCert accepts no responsibility for any loss suffered as a result of any reliance upon such assessment or report other than as being accurate at the date the report was issued'.

### 3.0 BCA ASSESSMENT DATA

The building project discussed in this report is situated at **16-20 MIDDLE HARBOUR RD, LINDFIELD**. The proposed development involves the construction and operation of a new **RESIDENTIAL APARTMENT DEVELOPMENT**. The residential development consists of a 9-storey residential flat building including 79 market residential units, 19 affordable housing units and ground floor common facilities and communal open space.

#### 3.1 BUILDING CLASSIFICATION

For the purposes of the Building Code of Australia (BCA) the development may be described as follows.

CLASS	LEVEL	DESCRIPTION
Class 7a	Basement B1-B3	Carpark
Class 2	Lower Ground Level	Residential
Class 7b	Lower Ground Level	Storage
Class 9b	Lower Ground Level	Communal room
Class 10b	Lower Ground Level	Pool
Class 2	Upper Ground – Level 9	Residential
<b>OVERALL STOREYS CONTAINED</b>		12
<b>RISE IN STOREYS</b>		9
<b>TYPE OF CONSTRUCTION</b>		Type A Construction
<b>EFFECTIVE HEIGHT (M)</b>		>25m
<b>GENERAL FLOOR AREA AND VOLUME LIMITATIONS FOR TYPE A CONSTRUCTION</b>		The floor area and volume of the building remain within the prescribed limitations for Type A Construction.
<b>FIRE COMPARTMENTS</b>		Each storey of the building will be considered as a separate fire compartment.
<b>CLIMATE ZONE</b>		Climate Zone 5 - warm temperate.

Table 2: Building Classification(s)

#### 3.2 LOCATION OF FIRE-SOURCE FEATURES

The potential fire source features along the perimeter of the building are:

ELEVATION	DESCRIPTION / FIRE SOURCE FEATURE
North Boundary	Residential dwellings
East Boundary	Residential dwellings
South Boundary	Middle Harbour Rd
West Boundary	Residential dwellings

Table 3: Location of Fire-Source Features

Note: The BCA defines “fire source feature” as:

- The far boundary of a road, river, lake or the like adjoining the allotment; or
- A side or rear boundary of the allotment; or
- An external wall of another building on the allotment which is not a Class 10 building

## 4.0 BCA ASSESSMENT – KEY REQUIREMENTS

LEGEND	
NA	Not applicable. The deemed-to-satisfy clause is not applicable to the design.
NOTE	For information only but to be incorporated into the scheme or detailed for compliance to be achieved.
COMPLIES	The design complies with the relevant parts of the deemed-to-satisfy clause.
CRA	Compliance is readily achievable. The design meets relevant deemed-to-satisfy clauses. Yet, certification by the appropriate party or inclusion in plans or BCA specifications at a specific stage is essential for strict compliance.
FI	Further information is required.
DNC	Does not comply. The proposal does not comply with this clause and redesign is required.
PS	Performance Solution. A performance solution is proposed or recommended to achieve BCA compliance in lieu of adherence to the subject deemed-to-satisfy clause.

*Table 4: BCA Clause-By-Clause Assessment Legend*

This is not an exhaustive list of BCA clauses but highlights the key requirements pertinent to the proposed work. The details below should be read in conjunction with the full BCA.

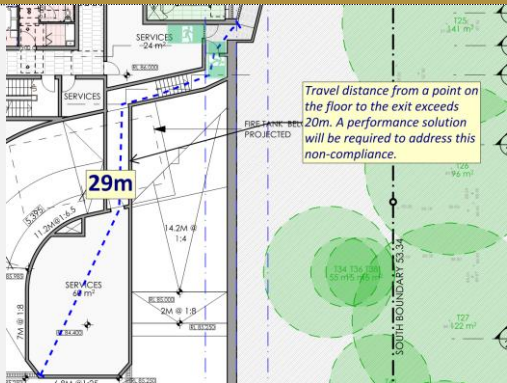
BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
<b>SECTION B: STRUCTURE</b>			
<b>Part B1</b>	<ul style="list-style-type: none"> <li>(1) New building works must comply with the structural provisions of the BCA 2022 and referenced standards, including AS 1170.</li> <li>(2) The Structural Engineer must acknowledge and address the Importance Level provisions outlined in Section B of the BCA as necessary.</li> <li>(3) Compliance with AS 3826-1998 should be considered.</li> <li>(4) For alterations to an existing building, the Structural Engineer must certify that the structural capacity of the existing building will not be compromised by the new works.</li> </ul>	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>The structural engineer must ensure full compliance with the requirements of Section B of the BCA, as well as all applicable Australian Standards.</p>	<b>CRA</b>
<b>SECTION C: FIRE RESISTANCE</b>			
<b>C2D3</b> Calculation of rise in storeys	(1) The building works must achieve fire compartment sizes that do not exceed the Deemed-to-Satisfy (DtS) requirements of this clause.	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>The building is designed with a rise in storeys of nine, which requires a minimum of Type A fire-resisting construction.</p>	<b>CRA</b>
<b>C2D4</b> <i>(Previously C1.3)</i> Buildings of multiple classification	<ul style="list-style-type: none"> <li>(1) In a building of multiple classifications, the Type of construction required for the building is the most fire-resisting Type resulting from the application of Table C2D2 on the basis that the classification applying to the top storey applies to all storeys.</li> <li>(2) In a building containing a Class 4 part on the top storey, for the purpose of (1), the classification applying to the top storey must be—               <ul style="list-style-type: none"> <li>(a) when the Class 4 part occupies the whole of the top storey, the classification applicable to the next highest storey; or</li> <li>(b) when the Class 4 part occupies part of the top storey, the classification applicable to the adjacent part.</li> </ul> </li> </ul>	<p><b>NOTE</b></p> <p>The building is considered a Class 2 building of type A construction.</p>	<b>NOTE</b>
<b>C2D10</b> Non-combustible building elements	<ul style="list-style-type: none"> <li>(1) All materials and components incorporated in an external wall or fire-rated wall must be non-combustible. This includes, but is not limited to:               <ul style="list-style-type: none"> <li>(a) External Wall Claddings: Any materials used as cladding on external walls.</li> <li>(b) Framing or Integral Formwork Systems: Includes timber framing, sacrificial formwork, and similar materials.</li> <li>(c) External Linings or Trims: Such as external UPVC window linings, timber window blades, etc.</li> </ul> </li> </ul>	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>At this stage, the specific building components proposed for construction have not been identified. Detailed plans and specifications are to be provided at the Construction Certificate stage.</p>	<b>CRA</b>

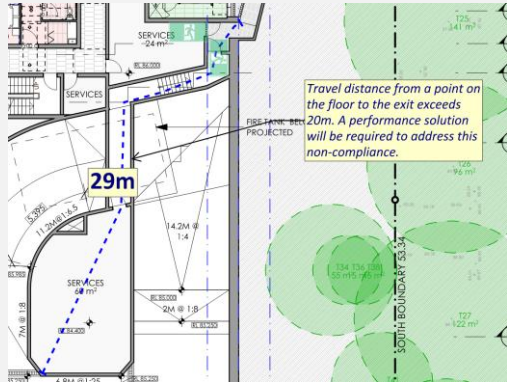
BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS								
	<p>(d) Sarking or Insulation: Any sarking or insulation contained within the wall assembly.</p> <p>Note: This list is not exhaustive. All elements incorporated within any external wall assembly must be identified and approved prior to the issuance of a Construction / Crown Certificate.</p>										
<p><b>NSW C2D11</b> Fire hazard properties</p> <p><i>(Referenced: Specification 7)</i></p>	<p>(1) A schedule of all wall, floor, and ceiling linings, accompanied by relevant test reports, must be provided for review to ensure compliance with the fire hazard property requirements of the BCA. Please note:</p> <p>(a) Minimum Group Numbers apply to wall and ceiling linings. Compliance should be verified with AS 5637 test reports.</p> <p>(b) Minimum Critical Radiant Flux values apply to floor linings. Compliance should be verified with AS ISO 9239.1 test reports.</p> <p>Note: Refer to <a href="#">APPENDIX TABLE: SPECIFICATION 7 (TABLES S7C3, S7C4, AND NSW S7C7)</a> for the required fire hazard properties.</p>	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>At this stage, there are no test details available to verify compliance in this instance. To ensure compliance with the requirements of this clause, test reports are to be provided that verify the Fire Hazard Properties of different linings, materials, assemblies, and coverings.</p>	<p><b>CRA</b></p>								
<p><b>C2D14</b> Ancillary elements</p>	<p>(1) An ancillary element must not be fixed, installed, or attached to the internal parts or external face of an external wall that is required to be non-combustible unless it complies with this clause.</p>	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>At this stage, ancillary elements to the building have not been identified. Detailed plans and specifications are to be provided at the Construction Certificate stage.</p>	<p><b>CRA</b></p>								
<p><b>C3D3</b> General floor area and volume limitations</p>	<p>(1) The building must adhere to fire compartment sizes that do not exceed the deemed-to-satisfy (DtS) requirements of this clause. Refer to the table below for the general floor area and volume limitations.</p> <table border="1" data-bbox="445 924 1059 1115"> <thead> <tr> <th>Classification</th> <th>Type A Construction</th> </tr> </thead> <tbody> <tr> <td rowspan="2">5, 9b or 9c</td> <td>Max floor area—8 000 m<sup>2</sup></td> </tr> <tr> <td>Max volume—48 000 m<sup>3</sup></td> </tr> <tr> <td rowspan="2">6, 7, 8 or 9a (except for patient care areas)</td> <td>Max floor area—5 000 m<sup>2</sup></td> </tr> <tr> <td>Max volume—30 000 m<sup>3</sup></td> </tr> </tbody> </table> <p><i>Table 5: General floor area and volume limitations</i></p>	Classification	Type A Construction	5, 9b or 9c	Max floor area—8 000 m <sup>2</sup>	Max volume—48 000 m <sup>3</sup>	6, 7, 8 or 9a (except for patient care areas)	Max floor area—5 000 m <sup>2</sup>	Max volume—30 000 m <sup>3</sup>	<p><b>NOT APPLICABLE</b></p>	<p><b>NA</b></p>
Classification	Type A Construction										
5, 9b or 9c	Max floor area—8 000 m <sup>2</sup>										
	Max volume—48 000 m <sup>3</sup>										
6, 7, 8 or 9a (except for patient care areas)	Max floor area—5 000 m <sup>2</sup>										
	Max volume—30 000 m <sup>3</sup>										
<p><b>C3D6</b> Class 9a and 9c buildings</p>	<p><b>NOT APPLICABLE</b></p>	<p><b>NOT APPLICABLE</b></p>	<p><b>NA</b></p>								
<p><b>C3D7</b> Vertical separation of openings in external walls</p>	<p><b>NOT APPLICABLE</b></p>	<p><b>NOT APPLICABLE</b> Given that the building exceeds 25 metres in height, a system designed in accordance with AS2118.1-2017 will be provided throughout the building.</p>	<p><b>NA</b></p>								

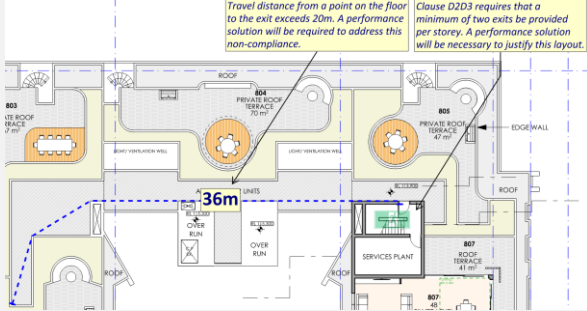
BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
<p><b>C3D8, C3D9, C3D10</b> Separation of classifications</p>	<p>(1) Construction — A fire wall must be constructed in accordance with the following:</p> <ul style="list-style-type: none"> <li>(a) The fire wall has the relevant FRL prescribed by Specification 5 for each of the adjoining parts, and if these are different, the greater FRL, except where S5C19(3)(c)(i), S5C22(3)(c)(i) and S5C25(3)(c)(i) permit a lower FRL on the carpark side.</li> <li>(b) Any openings in a fire wall must not reduce the FRL required by Specification 5 for the fire wall, except where permitted by the Dts Provisions of Part C4.</li> <li>(c) Building elements, other than roof battens with dimensions of 75 mm x 50 mm or less or sarking-type material, must not pass through or cross the fire wall unless the required fire-resisting performance of the fire wall is maintained.</li> </ul> <p>(2) Separate classifications must either be divided by a fire wall that meets the higher Fire Resistance Level (FRL) requirement between the two classes, or alternatively, the higher FRL must apply to both areas in accordance with Specification 5.</p> <p>(3) Separation of fire compartments — A part of a building separated from the remainder of the building by a fire wall may be treated as a separate fire compartment if it is constructed in accordance with (a) and the fire wall extends to the underside of—</p> <ul style="list-style-type: none"> <li>a. a floor having an FRL required for a fire wall; or</li> <li>b. the roof covering.</li> </ul> <p>(4) If parts of different classification are situated one above the other in adjoining storeys they must be separated as follows:</p> <ul style="list-style-type: none"> <li>c. Type A construction — The floor between the adjoining parts must have an FRL of not less than that prescribed in Specification 5 for the classification of the lower storey.</li> </ul>	<p><b>PERFORMANCE SOLUTION REQUIRED</b></p> <p>The floor separating Basement 1 from the Lower Ground Floor is required to achieve a FRL of not less than 120/120/120.</p> <p>The Lower Ground Floor contains a Class 7b component (waste rooms), which is subject to a higher fire resistance requirement of 240 minutes. A Performance Solution will be required to rationalise this FRL from 240 minutes down to 120 minutes. This rationalisation will also apply to the floor separating the Lower Ground Floor and the Upper Ground Floor.</p> <p>Additionally, an opening exists between the loading bay and Waste Room 1 on the Lower Ground Floor. This opening is to be fire separated via a fire-rated roller shutter. The adequacy of this separation is also to be addressed through a Performance Solution at the CC stage.</p>	<p>PS</p>
<p><b>C3D12 C3D13</b> Separation of equipment</p>	<p>(1) The following equipment must be isolated from the rest of the building with construction that achieves a Fire Resistance Level (FRL) of 120/120/120, or the FRL required by Specification C1.1, whichever is greater. Doorways must be equipped with self-closing -/120/30 fire doors:</p> <ul style="list-style-type: none"> <li>(a) Lift motors and lift control panels</li> <li>(b) Battery or batteries installed in the building with a voltage exceeding 24 volts and a capacity exceeding 10 ampere hours</li> </ul> <p>Note: Confirmation is required as to whether any of the above will be applicable to this development.</p>	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>The separation of equipment as specified in this clause must be clearly detailed on the plans. The construction used for separation should comply with the requirements of the clause. Detailed plans and specifications to be provided at the Construction Certificate stage.</p>	<p>CRA</p>

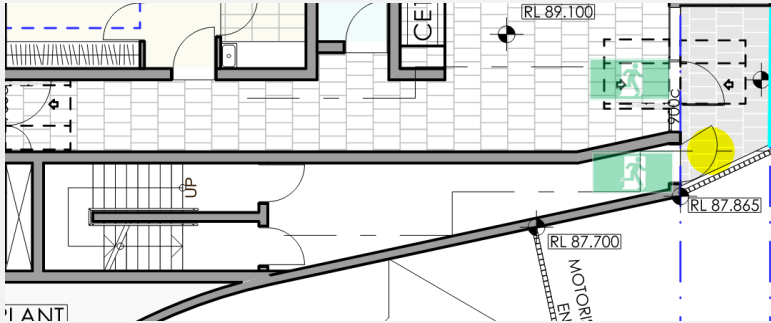

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
	<p>(2) A main switchboard located within the building which sustains emergency equipment operating in the emergency mode must:</p> <p>(a) Be separated from any other part of the building by construction having an FRL of not less than 120/120/120; and</p> <p>(b) Have any doorway in that construction protected with a self-closing fire door having an FRL of not less than – /120/30.</p>		
<p><b>C3D15</b> Public corridors in Class 2 and 3 buildings</p>	<p>(1) In a Class 2 or 3 building, any public corridor exceeding 40 meters in length must be divided at intervals of no more than 40 meters with smoke-proof walls.</p>	<p><b>COMPLIANCE READILY ACHIEVABLE</b> A review of the floor plans indicates that the corridor lengths are more than 40m. Additionally, the corridors appear to be compartmentalised by doors at either end. These details are to be confirmed and documented during the Construction Certificate stage.</p>	<p><b>CRA</b></p>
<p><b>C4D3</b> Protection of openings in external walls and <b>C4D5</b> Acceptable methods of protection</p>	<p>(1) Openings that are less than 3 meters from the allotment boundary must be protected in accordance with BCA Clause C3.4.</p>	<p><b>COMPLIANCE READILY ACHIEVABLE</b> The openings in the external wall on Upper Ground / Level 1, located along the path of egress from the rear fire exit, are required to be internally protected in accordance with C4D5. These protection measures must be clearly detailed in the Construction Certificate plans and specifications.</p>	<p><b>CRA</b></p>
<p><b>C4D12</b> <i>(Previously C3.11)</i> Bounding construction: Class 2 and 3 buildings and Class 4 parts</p>	<p>(1) A doorway in a Class 2 building must be protected if it provides access from a sole-occupancy unit to –</p> <p>(a) a public corridor, public lobby or like; or</p> <p>(b) a room not within a sole-occupancy unit; or</p> <p>(c) the landing of an internal non fire-isolated stairway that serves as a required exit; or</p> <p>(d) another sole-occupancy unit.</p> <p>(2) A doorway in a Class 2 building must be protected if it provides access from a room not with a sole-occupancy unit to a public corridor/lobby or the like; or the landing of an internal non-fire isolated stairway that serves as a required exit.</p> <p>(3) Protection for a doorway required under (1) or (2) must be at least—</p> <p>(a) in a building of Type A construction — a self-closing –/60/30 fire door.</p>	<p><b>COMPLIANCE READILY ACHIEVABLE</b> All doorways and openings along the egress path from sole-occupancy units or rooms not within a sole-occupancy unit will be protected in accordance with NCC Clause C3D3. Where required, self-closing –/60/30 fire doors will be provided to doorways, and external walls adjacent to balconies or landings without an alternative direction of egress will comply with the fire-protective construction and opening protection requirements of C3D3(6). Compliance is readily achievable through standard fire-rated door and window systems.</p>	<p><b>NA</b></p>

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
	<p>(4) Other openings in internal walls which are required to have an FRL with respect to integrity and insulation must not reduce the fire-resisting performance of the wall.</p> <p>(5) The requirements of (6) apply in a Class 2 or 3 building where a path of travel to an exit—</p> <ul style="list-style-type: none"> <li>(a) does not provide a person seeking egress with a choice of travel in different directions to alternative exits; and</li> <li>(b) is along an open balcony, landing or the like; and</li> <li>(c) passes an external wall of— <ul style="list-style-type: none"> <li>(i) another sole-occupancy unit; or</li> <li>(ii) a room not within a sole-occupancy unit.</li> </ul> </li> </ul> <p>(6) The external wall mentioned in (5)(c) must—</p> <ul style="list-style-type: none"> <li>(a) be constructed of concrete or masonry, or be lined internally with a fire-protective covering; and</li> <li>(b) have any doorway fitted with a self-closing, tight-fitting solid core door not less than 35 mm thick; and</li> <li>(c) have any windows or other openings— <ul style="list-style-type: none"> <li>(i) protected internally in accordance with C4D5; or</li> <li>(ii) located at least 1.5 m above the floor of the balcony, landing or the like.</li> </ul> </li> </ul>		
<b>Specification 5</b> Fire-resisting construction	<p>(1) New building works must comply with Specification 5 requirements for Type A Construction.</p>	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>All building works must comply with the requirements outlined in Specification 5 of the BCA. These provisions are to be clearly documented in the Construction Certificate plans and specifications.</p>	<p><b>CRA</b></p>
<b>SECTION D: ACCESS AND EGRESS</b>			
<b>D2D3</b> Number of exits required	<p>(1) The building has an effective height of 27.9m and therefore must have two (2) exits on each storey to be deemed compliant. A concession applies in D2D3(2) which states that the requirements above do not apply to a part of a storey that:</p> <ul style="list-style-type: none"> <li>(a) Is provided with direct egress to a road or open space; and</li> <li>(b) Satisfies D2D5 by the provision of 1 exit.</li> </ul>	<p><b>PERFORMANCE SOLUTION</b></p> <p>The services room on the Lower Ground Floor is provided with direct egress to open space, however, the travel distance is up to 29 m, which exceeds the 20 m limit permitted under Clause D2D5 for areas served by a single exit. As such, the exception under Clause D2D3(2)(b)(i) does not apply, and the current configuration does not comply with the Deemed-to-Satisfy provisions. A Performance Solution will be required to justify the extended travel distance to open space.</p>	<p><b>PS</b></p>

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
	<p>(2) Basements — Not less than 2 exits must be provided from any storey if egress from that storey involves a vertical rise within the building of more than 1.5 m, unless:</p> <ul style="list-style-type: none"> <li>(a) The floor area of the storey is not more than 50 m<sup>2</sup>; and</li> <li>(b) The distance of travel from any point on the floor to a single exit is not more than 20 m.</li> </ul> <p>(3) Access to exits — Without passing through another sole-occupancy unit, every occupant of a storey or part of a storey must have access to:</p> <ul style="list-style-type: none"> <li>(a) An exit; or</li> <li>(b) At least 2 exits if 2 or more exits are required.</li> </ul>	 <p>Level 9 (Roof Terrace) is provided with a single exit with travel distances to that exit measured up to 36m in lieu of 20m. The architect has confirmed that this part of Level 9 will be used for non-residential purposes (i.e. used to contain AC condensers). A review of the travel distances will be required as the design develops at the CC stage.</p>	
<p><b>D2D4</b> When fire-isolated stairways and ramps are required</p>	<p>(1) This clause specifies that stairways and ramps serving as required exits in Class 2 and 3 buildings must be fire-isolated under the following conditions:</p> <ul style="list-style-type: none"> <li>(a) Subject to (b), every stairway or ramp serving as a required exit must be fire-isolated unless it connects, passes through or passes by not more than— <ul style="list-style-type: none"> <li>(i) 3 consecutive storeys in a Class 2 building; or</li> <li>(ii) 2 consecutive storeys in a Class 3 building.</li> </ul> </li> <li>(b) Notwithstanding (a), one extra storey of any classification may be included if— <ul style="list-style-type: none"> <li>(i) it is only for the accommodation of motor vehicles or for other ancillary purposes; or</li> <li>(ii) the building has a sprinkler system (other than a FPAA101D system) complying with Specification 17 installed throughout; or</li> <li>(iii) the required exit does not provide access to or egress for, and is separated from, the extra storey by construction having— <ul style="list-style-type: none"> <li>(A) an FRL of –/60/60, if non-loadbearing; and</li> <li>(A) an FRL of 90/90/90, if loadbearing; and</li> <li>(A) no opening that could permit the passage of fire or smoke.</li> </ul> </li> </ul> </li> </ul>	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>Stairways serving as required exits must be fire-isolated in accordance with the provisions of this clause. The FRL of these stairways must be clearly documented in the Construction Certificate plans and specifications.</p>	CRA

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
<p><b>D2D5</b> Exit travel distances</p>	<p>(1) Class 5, 6, 7, 8, and 9 Areas: Exit travel distances must not exceed 20 meters to a point of choice between alternative exits and 40 meters to the nearest exit.</p> <p>(2) Class 2 and 3 Floors:</p> <p>(a) The entrance doorway of any sole-occupancy unit must be not more than—</p> <p>(i) 6 m from an exit or from a point from which travel in different directions to 2 exits is available; or</p> <p>(ii) 20 m from a single exit serving the storey at the level of egress to a road or open space; and</p> <p>(b) no point on the floor of a room which is not in a sole-occupancy unit must be more than 20 m from an exit or from a point at which travel in different directions to 2 exits is available.</p>	<p><b>PERFORMANCE SOLUTION</b></p> <p>The services room on the Lower Ground Floor is provided with direct egress to open space, however, the travel distance is up to 29 m, which exceeds the 20 m limit permitted under Clause D2D5 for areas served by a single exit. A Performance Solution will be required to justify the extended travel distance to open space.</p>  <p>On the same storey (lower ground), the loading bay (RL84.4) has direct access into the service corridor (RL 84.4). Access is required for persons in the loading bay and connecting driveways to have access to the exits serving the remainder of the storey. Extended travel distances exist in the driveways as follows:</p> <p>(1) Up to 22m to a point of choice from the motorised basement entry gate. Note the first path of travel is through the loading bay to the exit closest to the indoor lap pool, and the second path will be down the driveway to the closest fire stair on Basement 1.</p> <p>On levels 2 to 4, the travel distance to the exit (fire-stair) from sole-occupancy units 201, 214, 301, 314, 401, 412 exceed 6m, measured up to 7.5m. A Performance Solution will be required to justify the extended travel distance at the residential levels.</p> <p>Level 9 (Roof Terrace) is provided with a single exit with travel distances to that exit measured up to 36m in lieu of 20m. The architect has confirmed that this part of Level 9 will be used for non-residential purposes (i.e. used to contain AC</p>	<p>PS</p>

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		<p>condensers). A review of the travel distances will be required as the design develops at the CC stage and a performance solution required to address this issue.</p>  <p><i>Travel distance from a point on the floor to the exit exceeds 20m. A performance solution will be required to address this non-compliance.</i></p> <p><i>Clause D2D3 requires that a minimum of two exits be provided per storey. A performance solution will be necessary to justify this layout.</i></p>	
<p><b>D2D6</b> Distance between alternative exits</p>	<p>(1) Exits that are required as alternative means of egress must be—</p> <ul style="list-style-type: none"> <li>(a) distributed as uniformly as practicable within or around the storey served and in positions where unobstructed access to at least 2 exits is readily available from all points on the floor including lift lobby areas; and</li> <li>(b) not less than 9 m apart; and</li> <li>(c) not more than— <ul style="list-style-type: none"> <li>(i) in a Class 2 or 3 building — 45 m apart; or</li> <li>(ii) in a Class 9a health-care building, if such required exit serves a patient care area — 45 m apart; or</li> <li>(iii) in all other cases — 60 m apart; and</li> </ul> </li> <li>(d) located so that alternative paths of travel do not converge such that they become less than 6 m apart.</li> </ul>	<p><b>PERFORMANCE SOLUTION</b></p> <p>The distance between alternative exits on Basement Levels 1, 2, and 3 exceeds the 60 m maximum prescribed by NCC Clause D2D6. The maximum measured distance is approximately 65 m. A Performance Solution will be required to justify this non-compliance.</p> <p>On upper ground, the egress route to the road will involve the alternative paths of travel to converge such that they become less than 6m apart. A Performance Solution will be required to justify this non-compliance.</p>	<p>PS</p>
<p><b>D2D7, D2D8, D2D9, D2D10, D2D11</b> Dimensions of egress paths to exits</p>	<ul style="list-style-type: none"> <li>(1) The minimum clear height along all egress paths must be no less than 2 meters.</li> <li>(2) The minimum width must be 1 meter, measured clear of any obstructions such as handrails and joinery.</li> <li>(3) In passageways, corridors, or ramps typically used for transporting patients in beds within treatment areas, the minimum width must be 1.8 meters.</li> </ul>	<p><b>COMPLIANCE READILY ACHIEVABLE</b></p> <p>A review of the plans indicates that the dimensions of the egress paths appear to comply with the relevant clause requirements. Confirmation of compliance is to be provided through detailed documentation in the Construction Certificate plans and specifications.</p>	<p>CRA</p>
<p><b>D2D12</b> Travel via fire-isolated exits</p>	<ul style="list-style-type: none"> <li>(1) A doorway from a room must not open directly into a stairway, passageway, or ramp that is required to be fire-isolated unless it is from— <ul style="list-style-type: none"> <li>(a) a public corridor, public lobby, or the like; or</li> <li>(b) a sole-occupancy unit occupying all of a storey; or</li> <li>(c) a sanitary compartment, airlock, or the like.</li> </ul> </li> </ul>	<p><b>PERFORMANCE SOLUTION</b></p> <p>The services plant on Level 9 opens into the fire-stair and an airlock is not provided. A performance solution will be required to address this non-compliance at the CC stage.</p>	<p>PS</p>

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
	<p>(2) Each fire-isolated stairway or fire-isolated ramp must provide independent egress from each storey served and discharge directly, or by way of its own fire-isolated passageway—</p> <ul style="list-style-type: none"> <li>(a) to a road or open space; or</li> <li>(b) to a point—               <ul style="list-style-type: none"> <li>(i) in a storey or space, within the confines of the building, that is used only for pedestrian movement, car parking, or the like and is open for at least 2/3 of its perimeter; and</li> <li>(ii) from which an unimpeded path of travel, not further than 20 m, is available to a road or open space; or</li> </ul> </li> <li>(c) into a covered area that—               <ul style="list-style-type: none"> <li>(i) adjoins a road or open space; and</li> <li>(ii) is open for at least 2/3 of its perimeter; and</li> <li>(iii) has an unobstructed clear height throughout, including the perimeter openings, of not less than 3 m; and</li> <li>(iv) provides an unimpeded path of travel from the point of discharge to the road or open space of not more than 6 m.</li> </ul> </li> </ul> <p>(3) Where a path of travel from the point of discharge of a fire-isolated exit necessitates passing within 6 m of any part of an external wall of the same building, measured horizontally at right angles to the path of travel, the following applies:</p> <ul style="list-style-type: none"> <li>(a) That part of the wall must have—               <ul style="list-style-type: none"> <li>(i) an FRL of not less than 60/60/60; and</li> <li>(ii) any openings protected internally in accordance with C4D5; and</li> </ul> </li> <li>(b) The protection required by (a) must extend for a distance of 3 m above or below, as appropriate, the level of the path of travel, or for the height of the wall, whichever is the lesser.</li> </ul> <p>(4) If more than 2 access doorways, not from a sanitary compartment or the like, open to a required fire-isolated exit in the same storey—</p> <ul style="list-style-type: none"> <li>(a) a smoke lobby in accordance with D3D7 must be provided; or</li> <li>(b) the exit must be pressurized in accordance with AS 1668.1.</li> </ul>	<p>At Upper Ground / Level 1, both the fire-isolated stairways—serving the descending residential levels and ascending basement levels—discharge into a shared fire-isolated passageway, rather than providing independent discharge paths as required by Clause D2D12(2).</p> <p>This configuration does not comply with the Deemed-to-Satisfy provisions, which require each fire-isolated stairway or ramp to discharge directly to open space, or via its own fire-isolated passageway. A Performance Solution will be required to justify this non-compliance</p>  <p>Additionally, the fire-isolated passageway discharged into a covered area that does not have an unobstructed clear height throughout, including the perimeter openings, of not less than 3 m. A Performance Solution will be required to justify this non-compliance</p> 	

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
		Additionally, the path of travel from the rear fire-isolated exits necessitates passing within 6m of unprotected openings in the external wall. The openings in the external wall measured within the 6m must be protected in accordance with this clause and C4D5 or alternatively be addressed under a performance solution by the fire safety engineer. The external wall must achieve a minimum FRL of 60/60/60.	
<b>D3D14, D3D15, NSW D3D16, D3D20, D3D22</b> Stairways, Balustrades, and Handrails	(1) Stairways, balustrades, and handrails to comply with the current Building Code of Australia (BCA) and AS 1428.1-2009. (2) Floor finishes should meet the required slip resistance standards as per AS 4586, along with the associated handbooks HB197 and HB198. Compliance must be confirmed at the Occupation stage, so material selection should account for these requirements.	<b>COMPLIANCE READILY ACHIEVEABLE – FURTHER DESIGN REVIEW REQUIRED.</b> At this stage, the requirements of Part D3 of the BCA, specifically concerning stairways, balustrades, handrails and the like will be complied with at the CC stage. The spiral stairways serving the Level 8 residential units will need to be detailed at the CC stage to ensure that barrier heights and balustrades comply with the requirements of this Part.	CRA
<b>D3D25, D3D26</b> Doors and Latching	(1) Egress doorways must swing in the direction of egress. (2) Doors must be easily opened without a key from the side facing a person seeking egress. (1) Operation should require a single-handed downward or pushing action on a device positioned between 900mm and 1100mm from the floor.	<b>COMPLIANCE READILY ACHIEVEABLE</b> At this stage, specific details regarding the doors and latching have not been provided for our assessment. To confirm compliance, details are to be included in the Construction Certificate plans and specifications.	CRA
<b>SECTION E: SERVICES AND EQUIPMENT</b>			
<b>E1D2</b> Fire hydrants	(1) The building must have fire hydrant coverage as per AS2419.1-2021. Compliance with this standard is to be confirmed by the Design Consultant at the Construction Certificate stage.	<b>COMPLIANCE READILY ACHIEVEABLE</b> The building, due to its size exceeding 500m <sup>2</sup> , is required to have a fire hydrant system installed. The installation must be in accordance with AS2419.1-2021.  To meet the requirements of this Clause, a detailed plan of the fire hydrant system, including information on booster location, internal hydrants and other relevant details, must be submitted.	CRA
<b>E1D3</b> Fire hose reels	(1) Fire hose reel coverage is required for the basement car park levels only. Where provided, fire hose reels must comply with AS 2441 – 2005. Compliance is to be confirmed by the design consultant at the Construction Certificate stage.	<b>COMPLIANCE READILY ACHIEVEABLE</b> Fire hose reel coverage is required for all three basement carpark levels in accordance with the provisions of this clause. Full details confirming compliance must be documented in the Construction Certificate plans and specifications.	CRA
<b>E1D4</b> Sprinklers	(1) An automatic fire sprinkler system is required for the building, with the system design varying based on the number of storeys.	<b>COMPLIANCE READILY ACHIEVEABLE</b> Sprinkler protection is mandatory for buildings with an effective height exceeding 25 metres. Accordingly, a sprinkler system designed in accordance with AS 2118.1-2017 will be installed throughout the entire building. Full details of the compliant system, including plans and specifications, to be provided at the Construction Certificate stage.	CRA

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
<b>E2D4, E2D5, E2D11, E2D12, E2D13</b> Smoke Hazard Management	(1) Installation of the following smoke hazard management systems throughout the building: (a) Automatic Fire Detection and Alarm System compliant with AS 1670.1 – 2018 and grid specifications (5m and 10m). (b) Stairway Pressurisation systems compliant with AS 1668.1 – 2015 for designated stairs. (c) Zone Smoke Control System meeting AS 1668.1 – 2015 standards. (d) Smoke and Heat Vents as per Specification 22 and AS 2665 – 2001. (e) Automatic shutdown of mechanical air handling systems on fire trip per AS 1668.1 Sections 5 and 6. (f) E2D20 compliance required for smoke detection and exhaust.	<b>COMPLIANCE READILY ACHIEVABLE</b> The following provisions are required in accordance with the relevant clause requirements and must be clearly documented in the Construction Certificate plans and specifications: <ul style="list-style-type: none"> <li>• Air pressurisation of fire-isolated stairways</li> <li>• Automatic smoke detection and alarm systems</li> <li>• Mechanical ventilation for the Class 7a car parking spaces</li> </ul>	<b>CRA</b>
<b>E2D21</b> Provision for special hazards	(1) Additional smoke hazard management measures may be required based on: (a) Unique characteristics of the building. (b) Specific function or purpose of the building. (c) Type or quantity of materials stored, displayed, or used. (d) Mix of classifications within a building or fire compartment not covered by E2D4 to E2D20 standards.	<b>NOT APPLICABLE</b>	<b>NA</b>
<b>PART E3</b>	(1) At least one emergency lift complying with (4) must be installed in— (a) a building which has an effective height of more than 25 m; (2) An emergency lift may be combined with a passenger lift and must serve those storeys served by the passenger lift so that all storeys of the building served by passenger lifts are served by at least one emergency lift. (3) Where two or more passenger lifts are installed and serve the same storeys, excluding a lift that is within an atrium and not contained wholly within a shaft— (a) at least two emergency lifts must be provided to serve those storeys; and (b) if located within different shafts, at least one emergency lift must be provided in each shaft.	<b>COMPLIANCE READILY ACHIEVABLE</b> At this stage, details regarding the passenger lifts and emergency lifts have not been provided. These must be documented during the Construction Certificate stage to confirm compliance with the relevant requirements.	<b>CRA</b>
<b>E4D2 – E4D8</b> Emergency Lighting and Exits Signs	(1) Requirements for emergency lighting and exit signage must adhere to E4D2 - E4D5 specifications as per AS 2293.1 – 2018.	<b>COMPLIANCE READILY ACHIEVABLE</b> At this stage, emergency lighting details compliant with clauses E4D2-E4D5 and AS 2293.1 have not been provided. Specifications and details are to be provided at the Construction Certificate stage.	<b>CRA</b>
<b>E4D9</b> Emergency warning and	(1) An emergency warning and intercom system complying with AS 1670.4 must be installed: (a) Buildings with an effective height exceeding 25 m.	<b>COMPLIANCE READILY ACHIEVABLE</b> Details of an AS 1670.4 compliant emergency warning and intercom system has not been provided. Specifications and details are to be provided at the Construction Certificate stage.	<b>CRA</b>

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
intercom systems			
<b>SECTION F: HEALTH AND AMENITY</b>			
<b>PART F1</b> Damp and weatherproofing	(1) Damp and weatherproofing must comply with the prescriptive requirements outlined in clauses F1.1 through F1.13.	<b>COMPLIANCE READILY ACHIEVABLE</b> At this stage, details for damp and weatherproofing have not been provided. Detailed plans and specifications to be provided at the Construction Certificate stage.	CRA
<b>PART F4</b> Sanitary and other facilities	(1) Sanitary facilities must be provided in accordance with the requirements specified in Table F2.3 for the subject part.	<b>COMPLIANCE READILY ACHIEVABLE</b> A review of the plans indicates that sanitary facilities have been provided in accordance with the relevant clause requirements. To confirm compliance, details are to be provided in the Construction Certificate plans and specifications.	CRA
<b>F5D2</b> Height of rooms and other spaces	(1) Minimum ceiling height requirements: (a) Class 2 / 3 / 4 Buildings: (i) Kitchen, laundry, or similar areas: 2.1m (ii) Corridor or passageway: 2.1m (iii) Habitable rooms (excluding kitchen): 2.4m (b) Class 5 / 6 / 7 / 8 Buildings: (i) General areas: 2.4m (ii) Corridors, passageways, or similar areas: 2.1m (c) Class 9a Buildings: (i) Patient care areas: 2.4m (ii) Operating theatres or delivery rooms: 3m (iii) Treatment rooms, clinics, waiting rooms, passageways, corridors, or similar areas: 2.4m (d) Class 9b Buildings: (i) School classrooms or assembly parts accommodating ≤ 100 persons: 2.4m (ii) Theatres, public halls, or assembly parts accommodating > 100 persons: 2.7m (e) Class 9c Buildings: (i) Kitchen, laundry, or similar areas: 2.1m (ii) Corridors, passageways, or similar areas: 2.4m (iii) Habitable rooms (excluding kitchen): 2.4m (iv) Community buildings: 2.4m	<b>COMPLIANCE READILY ACHIEVABLE</b> The minimum ceiling height requirements for various room types must comply with the measurements specified in this clause. Detailed plans and specifications to be provided at the Construction Certificate stage.	CRA

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	<ul style="list-style-type: none"> <li>(v) Offices, hairdressers, consultation rooms, etc.: 2.4m</li> <li>(f) General requirements for any building:               <ul style="list-style-type: none"> <li>(i) Bathrooms, sanitary compartments, tea preparation rooms, pantries, store rooms, or similar areas: 2.1m</li> <li>(ii) Commercial kitchens: 2.4m</li> <li>(iii) Areas above stairways, ramps, landings, or similar areas: 2m</li> </ul> </li> </ul>		
<b>PART F6</b> Light and ventilation	<ul style="list-style-type: none"> <li>(1) Artificial lighting systems: Must comply with Clause F4.4 and AS 1680.</li> <li>(2) Mechanical or air-conditioning installations: Must comply with Clause F4.5(b) and AS 1668.2-2012.</li> <li>(3) Natural lighting: Required for all bedrooms in Class 2 sole-occupancy units.</li> </ul>	<b>COMPLIANCE READILY ACHIEVABLE</b> A review of the plans suggests that natural lighting provisions appear to comply with the relevant clause requirements. However, artificial lighting systems and mechanical ventilation or air-conditioning installations have not yet been specified. To confirm full compliance, detailed documentation for all systems must be provided in the Construction Certificate plans and specifications.	<b>CRA</b>
<b>PART F7</b> Sound transmission and insulation	<ul style="list-style-type: none"> <li>(1) Floors and walls bounding Class 3 parts must comply with the prescriptive provisions of Part F5, pertaining to sound transmission and insulation.</li> </ul>	<b>COMPLIANCE READILY ACHIEVABLE</b> At this stage, details for sound transmission and insulation have not yet been provided. To confirm compliance with the relevant clauses, details are to be provided in the Construction Certificate plans and specifications.	<b>CRA</b>
<b>SECTION G: ANCILLARY PROVISIONS</b>			
<b>NSW G1D2</b> Swimming pools	<ul style="list-style-type: none"> <li>(1) For Class 2 or 3 buildings, or Class 4 parts of buildings, swimming pools with a water depth over 300 mm must have barriers to restrict young children's access, in accordance with:               <ul style="list-style-type: none"> <li>(a) AS 1926.1 and AS 1926.2, or</li> <li>(b) for spa pools:                   <ul style="list-style-type: none"> <li>(i) the requirements of (a), or</li> <li>(ii) clause 9 of the Swimming Pools Regulation 2018.</li> </ul> </li> </ul> </li> </ul>	<b>COMPLIANCE READILY ACHIEVABLE</b> At this stage, details for barrier around the indoor lap pool has not been provided. The barrier must be constructed in accordance with AS 1926.1 and AS 1926.2. To confirm compliance, details must be provided in the Construction Certificate plans and specifications.	<b>CRA</b>
<b>PART G6</b> Occupiable outdoor areas	<ul style="list-style-type: none"> <li>(1) Occupiable outdoor areas, such as communal rooftop spaces, must comply with the following provisions of the Building Code of Australia (BCA), treating them as internal building parts:               <ul style="list-style-type: none"> <li>(a) Fire hazard property</li> <li>(b) Provision for escape</li> <li>(c) Construction of exits</li> <li>(d) Firefighting equipment</li> <li>(e) Lift installations</li> <li>(f) Visibility in an emergency</li> <li>(g) Exit signs and warning systems</li> </ul> </li> </ul>	<b>NOT APPLICABLE</b>	<b>NA</b>

BCA CLAUSE	RELEVANT DEEMED-TO-SATISFY REQUIREMENTS	COMMENT	STATUS
	(h) Light and ventilation provisions		
<b>SECTION I: SPECIAL USE BUILDINGS</b>			
<b>PART I1</b> Class 9b buildings	(1) For a Class 9b building that is an entertainment venue, NSW Part I4 applies instead of Part I1.	<b>NOT APPLICABLE</b>	<b>NA</b>
<b>NSW PART I4</b> Entertainment venues	(1) Classified as an Entertainment Venue under the Environmental Planning and Assessment Regulations 2021, the building must comply with the requirements of this part. A detailed review shall be conducted before the Construction / Crown Certificate stage.	<b>NOT APPLICABLE</b>	<b>NA</b>
<b>SECTION J: ENERGY EFFICIENCY</b>			
<b>PART J</b> Class 9b buildings	<p>(1) New building works must comply with the Energy Efficiency Provisions of BCA 2022 Section J, specifically:</p> <ul style="list-style-type: none"> <li>(a) J1: Energy Efficiency Performance Requirements</li> <li>(b) J2: Energy Efficiency</li> <li>(c) J3: Elemental Provisions for a Class 2 Building and a Class 4 Part</li> <li>(d) J4: Building Fabric</li> <li>(e) J5: Building Sealing</li> <li>(f) J6: Air-Conditioning and Ventilation</li> <li>(g) J7: Artificial Lighting and Power</li> <li>(h) J8: Heated Water Supply and Swimming Pool and Spa Pool Plant</li> <li>(i) J9: Energy Monitoring and On-Site Distributed Energy Resources</li> </ul> <p>(2) The Construction/Crown Certificate documentation from the architect, mechanical, electrical, and hydraulic engineers must include details demonstrating compliance with these provisions as applicable to their respective disciplines.</p>	<b>NOT APPLICABLE</b>	<b>NA</b>

## 5.0 CONCLUSION

This report assesses the referenced architectural documentation in the Appendix section for the proposed development at **16-20 MIDDLE HARBOUR RD, LINDFIELD NSW 2070** against the Deemed-to-Satisfy provisions and Performance Requirements of the National Construction Code Series (Volume 1) Building Code of Australia 2022.

Based on this assessment, we confirm that compliance with the BCA provisions is achievable, provided that the project design team appropriately addresses the identified measures. Additionally, these matters can be resolved in the Construction Certificate documentation without conflicting with the Development Approval.

If you have any questions or would like to discuss any matter in more detail, please feel free to contact me at 02 9121 5070 or via email at [roland@allcertgroup.com.au](mailto:roland@allcertgroup.com.au).

Regards,



Roland Allam  
Director | Building Surveyor – Unrestricted (BDC3372)  
AllCert Pty Ltd

## 6.0 APPENDIX – REFERENCED DOCUMENTATIONS

### 6.1 ARCHITECTURAL AND SERVICE PLANS

The findings published in the report is based on a desktop assessment of the architectural and service plans, prepared by **PTI Architecture**, Project No. **P774**, drawings:

DRAWING TITLE	DRAWING NO.	REVISION	DATED
Architectural – <b>PTI Architecture</b> Project No. – <b>P774</b>			
Cover Sheet	00	-	-
Site Analysis – Proposed Site Plan	10	B	30/07/2025
Basement 3 Plan	11	B	30/07/2025
Basement 2 Plan	12	B	30/07/2025
Basement 1 Plan	13	B	30/07/2025
Lower Ground Floor Plan	14	B	30/07/2025
Upper Ground / Level 1 Floor Plan	15	B	30/07/2025
Level 2 Floor Plan	16	B	30/07/2025
Level 3 Floor Plan	17	B	30/07/2025
Level 4 Floor Plan	18	B	30/07/2025
Level 5 Floor Plan	19	B	30/07/2025
Level 6 Floor Plan	20	B	30/07/2025
Level 7 Floor Plan	21	B	30/07/2025
Level 8 Floor Plan	22	B	30/07/2025
Level 9 Floor Plan	23	B	30/07/2025
Roof Plan	24	B	30/07/2025

Sections A & B	25	B	30/07/2025
Sections C & D	26	B	30/07/2025
Sections E & F	27	B	30/07/2025
Sections G & H	28	B	30/07/2025
Sections I & J	29	B	30/07/2025
Section K	30	B	30/07/2025
Elevations – South & East	32	B	30/07/2025
Elevations – North & West	33	B	30/07/2025
Elevations – Internal North & South	34	B	30/07/2025
External Finishes	35	B	30/07/2025

## 6.2 SPECIFICATION 7 (TABLES S7C3, S7C4, AND NSW S7C7)

**Table S7C3 of Specification 7– Critical Radiant Flux of Floor Linings and Floor Coverings**

Class of building	Building not fitted with a sprinkler system (other than a FPAA101D or FPAA101H system)	Building fitted with a sprinkler system (other than a FPAA101D or FPAA101H system)	Fire-isolated exits and fire control rooms
Class 2, 3, 5, 6, 7, 8 or 9b	2.2 kW/m <sup>2</sup>	1.2 kW/m <sup>2</sup>	2.2 kW/m <sup>2</sup>

**Table S7C4 of Specification 7 – Wall and Ceiling Lining Materials (Materials Groups Permitted)**

Class of building	Fire-isolated exits and fire control rooms	Public corridors	Specific areas	Other areas
Class 2 or 3, unsprinklered, excluding accommodation for the aged, people with disabilities and children	Walls: 1; Ceilings: 1	Walls: 1, 2; Ceilings: 1, 2	Walls: 1, 2, 3; Ceilings: 1, 2, 3	Walls: 1, 2, 3; Ceilings: 1, 2, 3
Class 2 or 3, sprinklered <sup>1</sup> , excluding accommodation for the aged, people with disabilities and children	Walls: 1; Ceilings: 1	Walls: 1, 2, 3; Ceilings: 1, 2, 3	Walls: 1, 2, 3; Ceilings: 1, 2, 3	Walls: 1, 2, 3; Ceilings: 1, 2, 3
Class 5, 6, 7, 8 or 9b schools, Unsprinklered	Walls: 1; Ceilings: 1	Walls: 1, 2; Ceilings: 1, 2	Walls: 1, 2, 3; Ceilings: 1, 2, 3	Walls: 1, 2, 3; Ceilings: 1, 2, 3
Class 5, 6, 7, 8 or 9b schools, Sprinklered	Walls: 1; Ceilings: 1	Walls: 1, 2, 3; Ceilings: 1, 2, 3	Walls: 1, 2, 3; Ceilings: 1, 2, 3	Walls: 1, 2, 3; Ceilings: 1, 2, 3

*"Specific areas" means within— for Class 2 and 3 buildings, a sole-occupancy unit; for Class 5 buildings, open plan offices with a minimum floor dimension/floor to ceiling height ratio > 5; and for Class 6 buildings, shops or other building with a minimum floor dimension/floor to ceiling height ratio > 5;*

**Table NSW Table S7C7 of Specification 7 – Other Materials**

Material or Assembly Location	Flammability Index	Spread-of-Flame Index (SoF)	Smoke-Developed Index
Fire control rooms subject to Specification 19 and fire-isolated exits, other than a sarking-type material used in a ceiling or used as an attachment or part of an attachment to a building element.	N/A	0	2
Class 9b buildings used as an entertainment venue, a material used to cover closed back upholstered seats in any part available to the public—where smoking is permitted; or flame is exposed in connection with the preparation of meals	N/A	6	5
Class 9b buildings used as an entertainment venue, a material used as a curtain, blind or similar decor in any part available to the public.	6	N/A	N/A
Class 9b buildings used as an entertainment venue, a material used to form a cinematograph screen.	12	0	7
Class 9b buildings used as a public hall or the like: A proscenium curtain required by Specification 32.	N/A	0	3
Escalators, moving walkways or non-required non fire-isolated stairways or pedestrian ramps subject to Specification 14.	N/A	0	5
Sarking-type materials: In a fire control room subject to Specification 19 or a fire-isolated exit used in the form of an exposed wall or ceiling.	0	N/A	N/A
Sarking-type materials other than in a fire control room subject to Specification 19 or a fire-isolated exit used in the form of an exposed wall or ceiling.	5	N/A	N/A
Other materials or locations and insulation materials other than Sarking-type materials.	N/A	9	8 (if SoF > 5)

<sup>1</sup> *"Sprinklered" means a building fitted with a sprinkler system (other than a FPAA101D or FPAA101H system) complying with Specification 17.*