

31 July 2026

Our Ref: PRO-09547-S5Z0

32 Kent Street Pty Ltd
Suite 12, 27-31 Crinan Street,
Hurlstone Park NSW 2193

Attention: Mirwan Hanna
Email: mirwan@multiform.net.au

Dear Mirwan,

32-34 Kent Street, Belmore NSW 2192
Re: Fire Engineering Supporting Letter for DA Lodgement

This letter, as a result of a review of architectural plans detailed in *Appendix A*, determines capability of compliance with the Performance Requirement provisions of the Building Code of Australia (BCA) 2022 Volume One, suitable for Development Application (DA) lodgement purposes.

As a result of a review of architectural plans detailed in *Appendix A*, compliance with the Performance Requirement provisions of the Building Code of Australia (BCA) 2022 Volume One within the scope has been determined for the lodged DA subject to the use of appropriately tested systems and correct construction methodology.

Upon review, it has been established that, of the variations to the Deemed-to-Satisfy (DTS) Provisions of the BCA identified within the Building Code of Australia Report (New 250718) Issue 3 prepared by New Crown Consulting Services Pty Ltd dated 22nd July 2026, the following DTS variations will comply with the relevant Performance Requirements of the BCA and the intent of the applicable Australian Standards subject to a Fire Engineering Performance Solution undertaken prior to the issue of the Construction Certificate (CC):

- **Clause C3D7** – to permit vertical spandrels less than minimum required by Clause C3D7 of the BCA. Upon completion of the Performance Solution, the proposed design will comply with Performance Requirement(s) C1P2 and therefore comply with the BCA. The following provisions are proposed as part of the performance solution assessment, including but not limited to:
 - Enhanced sprinkler system with fast-response sprinkler heads and additional drencher protection to the subject openings. Alternatively, an AS 2118.1-2017 sprinkler system is proposed for the subject building and as such, compliance with Clause C3D7 would not be required in this scenario.

- **Clause D2D5** – to permit extended travel distances to a single exit of up to 28m at the ground floor common open space in lieu of BCA DTS 20m. Upon completion of the Performance Solution, the proposed design will comply with Performance Requirement(s) D1P4 & E2P2 and therefore comply with the BCA. The following provisions are proposed as part of the performance solution assessment, including but not limited to:

 - Enhanced sprinkler system with fast-response sprinkler heads, non-combustible wall and floor coverings, enhanced fire-rated construction provisions (walls and doors), increased thickness of tempered glazing, no combustibles storage signage, enhanced visual and audible alerts (strobes and speakers).

- **Clause D2D5** – to permit the extended travel distances to an exit of up to 18m (in lieu of BCA DTS 6m) on Level 1, Level 2, Level 3, Level 4 and Level 5. Upon completion of the Performance Solution, the proposed design will comply with Performance Requirement(s) D1P4 & E2P2 and therefore comply with the BCA. The following provisions are proposed as part of the performance solution assessment, including but not limited to:

 - Enhanced sprinkler system with fast-response sprinkler heads, non-combustible wall and floor coverings, enhanced fire-rated construction provisions (walls and doors), no combustibles storage signage, enhanced audible alerts (additional thermal detection and speaker provisions).

- **Clause D2D5 & G6D4** – to permit the extended travel distances to an exit of up to 35 m (in lieu of BCA DTS 20m) Ground area. Upon completion of the Performance Solution, the proposed design will comply with Performance Requirement(s) D1P4 & E2P2 and therefore comply with the BCA. The following provisions are proposed as part of the performance solution assessment, including but not limited to:

 - Enhanced sprinkler system with fast-response sprinkler heads, non-combustible wall and floor coverings, enhanced fire-rated construction provisions (walls and doors), no combustibles storage signage, enhanced visual and audible alerts (strobes and speakers).

- **Clause D1P5** – to permit unprotected opening in external wall along discharge egress path along discharge from fire isolated stair. Upon completion of the performance solution, the proposed design will comply with performance requirement(s) D2D12 and therefore comply with the BCA. The following provisions are proposed as part of the performance solution assessment, including but not limited to:

 - Enhanced sprinkler system with fast-response sprinkler heads, non-combustible wall and floor coverings, enhanced fire-rated construction provisions (walls and doors), no combustibles storage signage, enhanced visual and audible alerts (strobes and speakers).

- **Clause D1P4** – to permit unprotected opening in external wall along discharge egress path along discharge from fire isolated stair. Upon completion of the performance solution, the proposed design will comply with performance requirement(s) D3D25 and therefore comply with the BCA. The following provisions are proposed as part of the performance solution assessment, including but not limited to:
 - Enhanced sprinkler system with fast-response sprinkler heads, non-combustible wall and floor coverings, enhanced fire-rated construction provisions (walls and doors), no combustibles storage signage, enhanced visual and audible alerts (strobes and speakers).

With respect to the abovementioned proposed Fire Engineering Performance Solutions and fire safety measures, we are confident that any modifications and advancement in level of details required to the proposal in order to satisfy the Performance Requirements of the BCA (in force at the time the Construction Certificate application is lodged) will not necessitate the need for any significant design changes that in turn would necessitate the submission of an application under Section 4.55 (formerly Section 96) of the Environmental Planning and Assessment Act 1979.

It is the opinion of this office that, upon the completion of a Fire Engineering Performance Solution prior to the issue of the Construction Certificate (CC), the subject abovementioned variations to the DTS Provisions of the BCA will comply with the relevant Performance Requirements of the Building Code of Australia (BCA) 2022 Volume One and is suitable for DA lodgement purposes.

Yours Faithfully,



Mardiros Tatian
BCA and Fire Engineering Consultant
BCA Innovations Pty Ltd

*M.Fire.Eng (Master of Fire Engineering)
Grad.Dip.Bld.Survey (Graduate Diploma of Building Surveying)
B.Med.Sci (Bachelor of Medical Science)
Building Professionals Board, NSW- A1 Accredited Certifier BPB 2572
Building Professionals Board, NSW- C10 Accredited Certifier BPB 2572*

***Liability limited by a scheme approved under
Professional Standards Legislation.***

Appendix A: Referenced Documentation

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

Drawing No.	Title	Project No.	Rev.	Date	Drawn By
200	SITE PLAN	510	P3	19/6/2026	Ross Howieson Architects
201	BASEMENT B1 PLAN	518	P3	19/6/2026	Ross Howieson Architects
202	GROUND FLOOR PLAN	518	P3	19/6/2026	Ross Howieson Architects
203	LEVEL 1 PLAN	518	P3	19/6/2026	Ross Howieson Architects
204	LEVEL 2 PLAN	518	P3	19/6/2026	Ross Howieson Architects
205	LEVEL 3 PLAN	518	P3	19/6/2026	Ross Howieson Architects
206	LEVEL 4 PLAN	518	P3	19/6/2026	Ross Howieson Architects
207	LEVEL 5 PLAN	518	P3	19/6/2026	Ross Howieson Architects
208	ROOF PLAN	518	P3	19/6/2026	Ross Howieson Architects
301	WEST ELEVATION	518	P3	19/6/2026	Ross Howieson Architects
302	NORTH ELEVATION	518	P3	19/6/2026	Ross Howieson Architects
303	EAST ELEVATION	518	P3	19/6/2026	Ross Howieson Architects
304	SOUTH ELEVATION	518	P3	19/6/2026	Ross Howieson Architects
401	SECTION AA	518	P3	19/6/2026	Ross Howieson Architects
402	SECTION BB	518	P3	19/6/2026	Ross Howieson Architects