

**OBJECTION PURSUANT TO SECTION 74B OF THE ENVIRONMENTAL PLANNING & ASSESSMENT REGULATION 2021****Project: The Gopher - 40 The Corso, Manly NSW 2095**

1. We note that the base building standards of performance as per Fire Safety Schedule for the following fire safety measures are:

Fire Safety Measure	Existing Minimum Standard of Performance as per latest AFSS
Automatic Smoke Detection and Alarm System	AS1670 - 2004 BCA E2.2
Portable Fire Extinguishers	AS2444 - 2001
AUTOMATIC SMOKE DETECTION AND ALARM SYSTEM	AS1670 - 2004 BCA E2.2

2. We also note that these standards of performance are different from the standards specified under the requirements of the latest NCC BCA 2022 Amendment 1.

3.

Fire Safety Measure	Standard of Performance
Automatic Smoke Detection and Alarm System	NCC 2022 ADMT. 2, CLAUSE E2D3, SPECIFICATION 20 (S20C4) & AS 1670.1-2018 AMENDMENT 1 (SPACING AND LOCATION);
Building Occupant Warning System	NCC 2022 ADMT. 2, CLAUSE E2D3, SPECIFICATION 20 (S20C7) & AS 1670.1-2018 AMENDMENT 1 (PERFORMANCE);
Portable Fire Extinguishers	NCC 2022 ADMT. 2, CLAUSE E1D14 & AS 24442001;

4. We further note that the base building infrastructure for each of these systems complies with the technical requirements of base building and performance standard as listed on the AFSS but not the technical requirements of the latest codes and standards.

5. We recommend that the Owner lodge an objection with the Certifying Authority that compliance with the specified provisions of the latest NCC (BCA) and Australian Standards that relate to the operational performance of the systems listed in item 1 is unreasonable and unnecessary.

6. The grounds of the objection are as follows:

**Automatic Fire Detection and Alarm System:** The system will provide the same coverage with detectors having the same sensitivity rating as those currently installed within the building. The operational performance of the detectors installed will be compliant with the base building system.

**Building Occupant Warning System:** The system will provide fire alarm tones within the tenancy consistent with the tones delivered to the remainder of the building. The operational performance of the audio / visual alarms installed will be compliant with the base building system.

7. Reference Documents:

Drawing Number	Revision	Date
F00 – Drawing List, Legend & Specification	1	26.08.2025
F01 – The Gopher- FIRE SERVICES DESIGN	1	26.08.2025

In conclusion based on the sections 1-5, it is our opinion that it is unreasonable and unnecessary to comply with the latest BCA requirements in view of the minor nature of the works. The operational performance of the existing fire safety systems serving the fit-out area would not adversely impact the fire safety of the building occupants from the existing fire systems installed throughout the building and thus is acceptable from a fire safety perspective.

Competent Fire Safety Practitioner (**FPAS: F040472D**) who endorsed the drawings and specifications: Mason Truong

Signed:



Date: 27.08.2025

Competent Fire Safety Practitioner (**NSWBPB: BDC 2194**) who endorsed the proposed noncompliance: Nick Lim S H

Signed:



Date: 27.08.2025