



DEVELOPMENT APPLICATION

To:	Northern Beaches Council	Project:	150238.00
Email:	council@northernbeaches.nsw.gov.au	Version:	A
Date:	2 October 2025		
Subject:	27 East Esplanade, Manly, NSW		

This letter is to advise that Holmes has been engaged by I.M. Advisory to provide fire engineering services for the proposed residential development, to be located at 27 East Esplanade, Manly, NSW.

1 INTRODUCTION

The project relates to the proposed Class 2 residential building to be located at 27 East Esplanade, Manly, NSW. The development's current concept design consists of three levels of basement carparking (Class 7a with ancillary storage and plant) connected by a car lift which is accessed from Ground Floor. Ground Floor to Level 6 contain luxury residential Class 2 Sole Occupancy Units (SOUs), with a single SOU on each floor, served by a lift and fire-isolated stair. Level 7 contains a Class 10b pool and upper portion of the Level 6 SOU.

A Building Code of Australia, 2022, Amendment 2 (BCA)¹ assessment (25-224106_BCACapStat_R02_250926) has been undertaken by Philip Chun Building Compliance, dated 26 September 2025. This report identified a number of non-compliances with the Deemed-to-Satisfy Provisions of the BCA that will be addressed by Holmes.

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 design approach will be in line with the Australian Fire Engineering Guidelines² 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.

- Clause C4D3 requires any opening in an external wall required to have an FRL that is located less than 3 m from a side or rear boundary to be protected in accordance with Clause C4D5. The subject building is to contain a number of openings to the east and west within 3 m of the side allotment

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.

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

boundaries and are not proposed to be protected in accordance with Clause C4D5. A Performance Solution using an absolute approach will be provided to address Performance Requirements C1P2 and C1P8 to allow for rationalised protection methods of the openings.

- Clause D2D6(b) requires exits that are required as alternative means of egress must be not less than 9 m apart. A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P4 and E2P2 to allow for alternative exits in basement carpark to be 8.4 m apart.
- Clause D2D12 requires fire-isolated stairs to discharge to a road, open space, or a covered area satisfying particular requirements. A Performance Solution using a comparative approach will be provided to address Performance Requirements D1P5 and E2P2 to allow the residential fire-isolated stairway to discharge into a non-compliant internal area.

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. Additional non-compliances may be identified as the design is further developed, however it is considered that there are no significant issues that would affect the building layout.

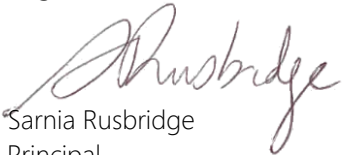
The information contained within this letter is based on the architectural drawings prepared by MHNDU, as listed below.

Dwg no.	Title	Date	Issue
DA 0000	COVERPAGE	24/09/2025	5
DA 1005	SITE PLAN	24/09/2025	5
DA 2000	LVL 03 BASEMENT PLAN	24/09/2025	5
DA 2001	LVL 02 BASEMENT PLAN	24/09/2025	5
DA 2002	LVL 01 BASEMENT PLAN	24/09/2025	5
DA 2003	GROUND FLOOR PLAN	24/09/2025	5
DA 2004	LEVEL 01 FLOOR PLAN	24/09/2025	5
DA 2005	LEVEL 02 FLOOR PLAN	24/09/2025	5
DA 2006	LEVEL 03 FLOOR PLAN	24/09/2025	5
DA 2007	LEVEL 04 FLOOR PLAN	24/09/2025	5
DA 2008	LEVEL 05 FLOOR PLAN	24/09/2025	5
DA 2009	LEVEL 06 FLOOR PLAN	24/09/2025	5
DA 2010	LEVEL 07 FLOOR PLAN	24/09/2025	5
DA 2011	ROOF PLAN	24/09/2025	5
DA 3000	ELEVATION NORTH	24/09/2025	5

Dwg no.	Title	Date	Issue
DA 3001	ELEVATION SOUTH	24/09/2025	5
DA 3002	ELEVATION EAST	24/09/2025	5
DA 3003	ELEVATION WEST	24/09/2025	5
DA 3100	SECTION AA	24/09/2025	5
DA 3101	SECTION BB	24/09/2025	5
DA 3102	SECTION CC	24/09/2025	5

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

Regards,

A handwritten signature in dark ink, appearing to read "Sarnia Rusbridge", written in a cursive style.

Sarnia Rusbridge
Principal
MEFire, BEMech (Hons), NER, CPEng,
Registered Certifier – Fire Safety (BDC0722)

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