



30 May 2024

Our Ref: SYD224-093-2 (ConsultantsAdvice) RD

David Payne Constructions  
**Sent via Email**

Attention: Charlie Boutros

**CRAGO MILL PRECINCT YASS VALLEY COUNCIL  
BCA CAPABILITY STATEMENT**

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**1. INTRODUCTION**

This statement has been prepared by Design Confidence on behalf of David Payne Constructions . It accompanies the Section 4.55 application for the proposed Crago Mill Precinct located at the 209-223 Comur Street Yass NSW 2582.

The proposed development and can be summarised as follows –

- (i) Four (4) storey Mill Community Hub
- (ii) Single storey Yass Valley Library
- (iii) Single storey Civic Administration Centre
- (iv) Two (2) storey commercial building.

The purpose of this statement is to provide the consent authority with a level of confidence that the proposed amendments are capable of complying with the relevant performance requirements of the BCA.

**2. BACKGROUND**

Design Confidence has been engaged to provide building regulatory advice regarding the compliance status of the proposed development when assessed against the relevant requirements as contained within the Building Code of Australia 2022 – Volume 1.

A broad assessment has been undertaken of the proposed design (as detailed within the documentation listed in Table 1 below). The assessment undertaken was in the context of the relevant provisions of the BCA excluding the accessibility provisions (Part D4 - Access for People with a Disability, Clause E3D7 & E3D8 - Passenger Lifts and Clause F4D5, F4D6, & F4D7 - Accessible Sanitary Facilities) as applicable to this development.

The correspondence contained herein relates solely to the works proposed / depicted in the architectural documentation listed in **Table 1** below.

**Table 1** – Architectural documentation

DRAWING	REV	TITLE	DATE
A01	C	COVER SHEET AND 3D IMAGE	22/05/2024

DRAWING	REV	TITLE	DATE
A02	C	LOCATION PLAN	22/05/2024
A03	C	SITE PLAN - DEMOLITION	22/05/2024
A04	C	SITE PLAN -NEW WORKS	22/05/2024
A06	C	SITE PLAN -ROOF PLAN	22/05/2024
A07	C	CIVIC ADMINISTRATION LEVEL 1 PLAN	22/05/2024
A08	C	LIBRARY LEVEL 1 PLAN	22/05/2024
A09	C	CRAGO MILL LEVEL 1 PLAN	22/05/2024
A10	C	CRAGO MILL -BASEMENT,LEVEL 2 AND	22/05/2024
A11	C	COMMERCIAL LEVEL 1 PLAN	22/05/2024
A13	C	CONTEXT ELEVATIONS 1 2 3	22/05/2024
A14	C	LIBRARY ELEVATIONS 4 5 6	22/05/2024
A15	C	LIBRARY ELEVATIONS 7 8	22/05/2024
A16	C	CIVIC ADMIN ELEVATIONS 9 10	22/05/2024
A17	C	CIVIC ADMIN ELEVATIONS 11 12	22/05/2024
A18	C	COMMERCIAL ELEVATIONS 13 14	22/05/2024
A19	C	SECTIONS 1 AND 2	22/05/2024
A20	C	SECTION 3	22/05/2024
A22	C	EXTERNAL MATERIAL	22/05/2024
A08	C	LIBRARY LEVEL 1 PLAN	22/05/2024
A09	C	CRAGO MILL LEVEL 1 PLAN	22/05/2024

### 3. DEVELOPMENT DESCRIPTION

Within the context of the BCA, a brief outline of the building's characteristics

**Table 2** – Building description

	DESCRIPTION	
Building Classification:	Office	Class 5
	Retail	Class 6
	Library/Exhibition spaces	Class 9b
Storeys Contained	Crago Mill	Four (4)
	Civic Administration Centre	One (1)
	Commercial Building	Two (2)
	Yass Valley Library	One (1)
Rise in Storeys	Crago Mill	Four (4)
	Civic Administration Centre	One (1)
	Commercial Building	Two (2)
	Yass Valley Library	One (1)
Type of Construction	Crago Mill	Type A
	Civic Administration Centre	Type C
	Commercial Building	Type C

DESCRIPTION		
	Yass Valley Library	Type C
Effective Height	All buildings less than 12 m	
Fire Compartment Size (Largest)	1,982 m <sup>2</sup> 8,047 m <sup>3</sup>	Within Limitation
Climate Zone	Zone 6	
Importance Level (AS1170.4)	Level 2	(Structural engineer to confirm)

**Table 3** – Floor areas and population

BUILDING OR PART	USE	FLOOR AREA (m <sup>2</sup> )	POPULATION
Crago Mill Basement	Exhibition hall	~133 m <sup>2</sup>	10
Crago Mill Level 1	Retail	~167 m <sup>2</sup>	76 patron and 3 staff
Crago Mill Level 2	Exhibition hall	~115 m <sup>2</sup>	15
Crago Mill Level 3	Exhibition hall	~114 m <sup>2</sup>	16
Commercial Level 1	Office	~576 m <sup>2</sup>	38
Commercial Level 2	Office	~598 m <sup>2</sup>	40
Library	Library	~1,215 m <sup>2</sup>	185
Civic building	Office	~1,982 m <sup>2</sup>	178

Notes: The populations for the civic (admin area), commercial building, library and retail space have been provided by the client. The populations for assembly areas of Crago Mill have been calculated using Table D2D18. The population of the Council Chambers area within the Civic building has been calculations based on number of seats.

#### 4. PERFORMANCE BASED ASSESSMENT

In addition to undertaking a detailed assessment of the design against the prescriptive requirements of the BCA a preliminary performance-based assessment has also been undertaken.

The implementation of a performance-based approach in lieu of compliance with the deemed-to-satisfy (DtS) provisions shall be in consultation with all relevant stakeholders and is subject to the approval of the certifying authority.

The adoption of performance solutions for fire safety matters may be subject to consultation with the NSW Fire Brigade as part of the Construction Certificate process under Section 25 - 29 of the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021.

The table below lists scenarios where we believe the adoption of a performance design may add value to development in-lieu of complying with the prescriptive (DtS) provisions—

**Table 4** – Performance Solutions

ITEM	PROPOSED PERFORMANCE SOLUTION	BCA DTS CLAUSE	PERFORMANCE REQUIREMENT
<b>FIRE SAFETY</b>			
1.	Justify external steel columns to library within 3 meters of boundary being provided with nil FRL.	C2D2 & Spec 5	C1P1 & C1P2
2.	Justify reduction of fire rating to intervening floors and all other structural members in Crago Mill to achieve Type A construction	C2D2 & Spec 5	C1P1 & C1P2

ITEM	PROPOSED PERFORMANCE SOLUTION	BCA DTS CLAUSE	PERFORMANCE REQUIREMENT
3.	Justify existing combustible attachments to external wall of Crago Mill (Timber infill window and Southern awning structure)	C2D14	C1P1 & C1P2
4.	Justify nil or reduced protection measures to openings that are exposed to fire source features in Library building	C4D3	C1P2
5.	Justify egress width on Level 2 of Crago Mill building being less than 1 m.	D2D8	D1P4
6.	Justify exit door to Tenancy 1 in Commercial building opening inwards in the opposite direction of egress.	D3D25	D1P4
<b>NON-FIRE SAFETY</b>			
7.	Unisex facilities are proposed to be provided within the Commercial building, whereby separate facilities for males and females should be provided.	F4D4	F4P1
8.	Justify reduced ceiling heights within Level 2 and 3 of Crago Mill building.	F5D2	F5P1

## 5. SUMMARY

We are of the opinion that the proposed works are capable of achieving compliance with the BCA, subject to building systems and services being designed and installed in accordance with the relevant design standards contained within the BCA.

Compliance can be achieved either by meeting the deemed-to-satisfy requirements of the BCA, or via a performance-based approach. Any performance solutions for the development will be developed as part of the ongoing design and consultation with the design team.

We trust that the above information is sufficient for the consent authority in assessing the merit of the architectural design from a regulatory perspective.

This statement should not be construed as relieving any other parties of their legislative or contractual obligations.

Design Confidence possess Indemnity Insurance to the satisfaction of the building owner.

Yours faithfully,



Ryan Dillon  
**Senior Building Regulations Consultant**  
 For Design Confidence (Sydney) Pty Ltd