

2026

**THE LEGISLATIVE ASSEMBLY FOR THE
AUSTRALIAN CAPITAL TERRITORY**

ELEVENTH ASSEMBLY

**Burrangiri Existing Building Assessment – GHD Design Report June 2026 – in response to
Respite Care Services – Improvement – Assembly Resolution of 26 March 2026**

**Presented by
Rachel Stephen-Smith MLA
Minister for Health
10-12 June 2026**

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Technical memorandum

June 10, 2026

To	Director of Facilities and Service Planning, Health and Community Services Directorate
From	GHD Pty Ltd – ACT, Southern NSW, and PNG Region
Project name	Burrangiri Building Analysis
Project no.	12699650
Subject	Building classification summary

1. Purpose of this Memorandum

The Legislative Assembly passed a motion in 2026 which called for the ACT Government to confirm through an independent and transparent process the appropriate National Construction Code (NCC) classification of the Burrangiri facility, located at 1–7 Rivett Place, Rivett. The purpose of this memorandum is to assist the ACT Government provide their response to the Legislative Assembly. This includes a general outline of Class 3 and Class 9c buildings, and a building classification assessment of the Burrangiri facility.

2. Outline of Class 3 and Class 9c buildings

Background to the National Construction Code (NCC)

The NCC is the main set of rules used in Australia for designing and constructing buildings. It establishes the minimum standards buildings must meet for safety, health, comfort, access and sustainability. The NCC also sorts buildings into different types (classifications) based on their intended use. Classifications help people understand the risks of buildings depending on how they will be used.

The NCC is adopted by each State and Territory through their respective building acts. For the ACT, the *Building Act 2004* applies.

Class 3 buildings

Class 3 buildings provide accommodation for unrelated people. These types of buildings are often the residential aspects of hotels and motels, bed & breakfast accommodation, backpackers' accommodation, and workers' quarters. A building which houses elderly people or other people who require special care can also be considered Class 3.

In Class 3 buildings, each bedroom or group of rooms with sleeping areas must be well separated from others. This helps give people privacy, comfort, and better protection in an emergency. Because of this, the building needs strong soundproofing and fire safety measures. However, these rules can make it harder to leave bedroom doors open, which may be difficult for people who need regular support. Class 3 buildings also usually assume that people can move around on their own and leave the building safely with limited help.

Class 9c buildings

Class 9c buildings provide residential accommodation for people who require ongoing personal care services and assistance. These types of buildings are typically residential aged care facilities where occupants may have reduced mobility, cognitive impairment, or other conditions that limit their ability to live independently. Staff are present to help with everyday tasks such as washing, getting dressed, taking medicine, and staying safe, especially in an emergency.

In Class 9c buildings, the layout and construction are designed to support people who may not be able to move or respond independently. Bedrooms are often grouped into smaller areas so staff can monitor residents and handle emergencies one part at a time, instead of evacuating the whole building at once. These buildings need strong fire safety features such as separation, smoke alarms, and fire sprinklers, but they should also be easy for staff and residents to see through, move through, and use. Doors are often set up to make it easier for staff to observe and help residents, rather than to separate rooms completely. Unlike Class 3 buildings, Class 9c buildings assume that many people will need help to evacuate, so they depend on staff support and carefully planned emergency procedures.

Summary comparison

The table below provides a high-level comparison between the two building classifications.

Table 1 Comparison table

Consideration	Class 3	Class 9c
Intended use	Residential	Residential care
Typical users	Workers, tourist, students	Aged care residents
Mobility and independence	Occupants are considered independent and can typically self-evacuate a building	Dependant occupants who are likely to require assistance to evacuate a building
Infrastructure	Lower levels of infrastructure required, with the fire strategy related to individual rooms	Higher levels of infrastructure, including fire protection e.g. fire sprinklers

3. Building classification assessment

CBS Certifier's prepared a report which outlines the building classification assessment. Refer to Attachment 1.

4. Scope and limitations

This report: has been prepared by GHD for the ACT Government and may only be used and relied on by the ACT Government for the purpose agreed between GHD and the ACT Government as set out in section 1 of this report.

GHD otherwise disclaims responsibility to any person other than the ACT Government arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

Attachment 1

Building classification assessment

EXISTING BUILDING ASSESSMENT & FIRE SAFETY REPORT

NATIONAL CONSTRUCTION CODE VOLUME ONE: BUILDING CODE OF AUSTRALIA
CLASS 2 TO 9 BUILDINGS

BURRANGIRI EXISTING BUILDING ASSESSMENT

Block 9 Section 28 Rivett

PREPARED FOR:

GHD Design

ISSUED: 02/06/2026 REV: 0.1
REF: C250076-01



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1.1. General

CBS Building Surveyors have been engaged by GHD Design to provide an Existing Building Assessment of the current use of the Burrangiri Building located Unit 1, 7 Rivett Place (Block 9, Section 28) Rivett.

1.2. Scope and Purpose

This report has been prepared to assist the design team in identifying existing building non-compliances when reviewed against the *National Construction Code 2022 Volume One: Building Code of Australia Class 2 to Class 9 Buildings* (BCA).

Further CBS were requested to provide recommendations of significant life health safety elements.

The purpose of this document is not to assist or direct design but inform the project team of project specifics in relation to interpreting the BCA and identifying non-compliances or areas where more information is required.

1.3. Existing Building Summary

Our understanding of the existing buildings use is it is currently used as a respite centre operated by The Salvation Army and described on their [website](#) as -

“Burrangiri Aged Care Respite Centre is an ACT health site operated by The Salvation Army Aged Care. The centre specialises in providing respite (short-term) care for older Australians. This is beneficial for both the carer and the person being cared for. The carer can take a break or attend to other tasks, while the person being cared for can enjoy a change of scene in a supported, restorative environment. It is perfect for carer respite as well as emergency respite and post hospitalisation care.

Clients can come for just a few hours or stay for up to 3 weeks. Our model of care is holistic, flexible, and personalised. There is plenty of opportunity to socialise with other clients, participate in group or individual programs or just chill in the garden with a cup of tea and your favourite novel.”

It is noted that the facility is not considered a hospital and care is related to short term carer respite compared to inpatient treatment. Occupants can book in regular, occasional or one-off care.

Facilities include care facilities such as rooms, lounge rooms, kitchen meal preparation & nurse care. Additionally, occupants have access to onsite hairdressing, laundry, library and visiting specialists.

1.4. Existing Building Classification Assessment

The building was constructed around 1987 & 1988. The applicable building regulations at the time of construction were likely derived from the ACT Building Manual 1986 edition. The building was constructed for the Australian Government as a Community Aged Care Centre (institutional building – Class XIA). This predates changes in the BCA 1996 Amendment 11 version which adopted a new building classification of Class 9c Aged Care Building which would be applicable if classified today.

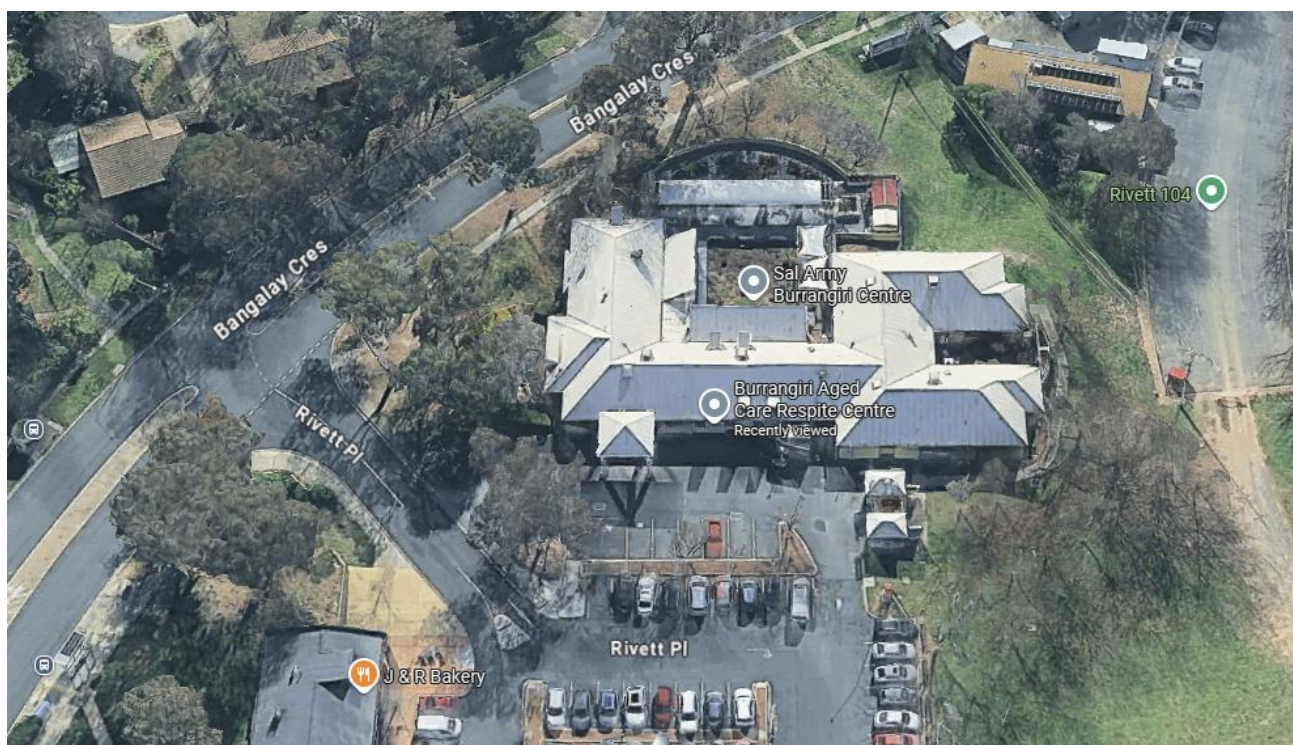
Documentation is limited and no completion document or Certificate of Occupancy and Use has been located so this assessment is subject to change.

The existing buildings has been assessed and classified under the current BCA and at the time of construction.

Table 1 – Building Characteristics

Characteristic	Existing - At Time of Construction	Current – If Constructed Today
Relevant Document	ACT Building Manual 1986 Edition (Assumed)	National Construction Code 2022 Volume One: Building Code of Australia Class 2 to Class 9 Buildings

Description	Community Aged Care Building	Burrangiri Existing Building Assessment (if constructed today)
Number of Units (If Applicable)	Whole of Building Tenancy	Whole of Building Tenancy
Building Classification	Class IXA Institutional building. Class 9a equivalent. (Pre Class 9c application)	Class 9c
Type of Construction	C (Equivalent)	C
Fire Compartment	Yes	Existing. Building would be separated into smoke compartments maximum 500m2
Rise in Storeys	1	1
Number of Storeys	1	1
Effective Height	<12m	<12m
Area of Works (Approx)	1010m2	1010m2



*Picture accessed maps.google.com.au on 01/06/2026

1.5. Identification of Active Fire Services

The following active and passive fire elements have been identified as applicable to this project. The table below includes a comparison of the existing services and what would be applicable if constructed today.

Australian Standards are referenced to current versions, existing compliance of elements may not need to be updated to comply with current requirements.

Table 2: Active Fire Services

<i>Item</i>	<i>Active Fire Service</i>	<i>Existing</i>	<i>Applicable if constructed today</i>	<i>Current Australian Standard and/or Specification</i>
1.	Fire Hydrants	Yes (May be via external street or attack hydrants)	Yes (May be via external street or attack hydrants)	AS2419.1-2021
2.	Fire Hose Reels	Yes	NA* Does not apply to a Class 9c building	AS2441-2005
3.	Automatic Smoke Detection and Alarm System	Yes	Yes	AS1670.1-2018, Specification 20
4.	Occupant Warning System	Yes	Yes	AS1670.1-2018
5.	Emergency Warning Intercom System	NA	NA	AS1670.4-2018
6.	Fire Extinguishers	Yes	Yes	AS2444-2001
7.	Exit & Emergency Lighting	Yes	Yes	AS/NZS2293.1-2018
8.	Fire Sprinklers	NA	Yes	AS2118.4-2012
9.	Automatic shutdown of air handling system	TBC	Yes	AS1668.1-2015
10.	Fire rated walls	Yes	Possible (NA to project)	Specification 11
11.	Smoke proof walls	NA	Yes	Specification 11

1.6. Fire Safety Review

The original building classification did not mandate the inclusion of fire sprinklers. Changes in the BCA have identified a substantial risk to the life health safety of occupants in buildings related to aged residential care following the Quakers Hill Fire in 2011. If the building was constructed today with its current use an AS2118.4 sprinkler system would be mandatory.

The NSW Government made automatic fire sprinkler systems mandatory in all residential aged care facilities and this applies retrospectively.

The same requirement does not apply retrospectively in ACT, however any new building works would trigger the requirement to demonstrate compliance with the *Building Act 2004* and the BCA. This would include the requirement to install a sprinkler system to ensure the works can demonstrate compliance with the NCC.

Building works is defined as work in relation to the erection, alteration or demolition of a building and includes works such as modification of fire services, mechanical services & ventilation, affecting a required exit or path to a required exit and any structural works.

1.7. Limitations

The following report has been assessed against the architectural requirements of the BCA and does not include nor imply compliance with:

- i. Structural adequacy or design
- ii. Fire-resistance levels for structural elements of the building unless specifically addressed/commented on.

- iii. Services design to compliance with Australian Standards including fire services, mechanical services, hydraulic, electrical services, vertical transportation, and civil design
- iv. Hydraulic design services including hydrant coverage
- v. Bushfire prone areas
- vi. Energy rating requirements
- vii. Assessment of proposals for Provision for Special Hazards under Clause E2D1
- viii. Compliance of the existing building including a site inspection of the existing building

1.8. Identification of Performance Solutions

At the time of writing this report there were no identified existing performance solutions provided.

1.9. Summary of findings

Based on our review it has been identified that the existing building has significant shortfalls when compared to the current BCA. Of concern is a lack of fire sprinklers to the existing building.

As a minimum it is recommended the building be upgraded to include –

- An automatic fire sprinkler system to AS2118.4-2012 is installed to comply with Clause E1D10 of the BCA.
- An upgrade of the smoke detection and alarm system to AS1670.1-2018
- Ensure all existing fire walls meet a minimum FRL of 90/90/90 (existing)
- Upgrade internal walls to ensure no smoke compartment exceeds 500m²
- A hydrant coverage assessment to be completed by a hydraulic engineer to ensure coverage to all areas of the building.
- Ensure all exits are free from obstructions and upgrade all door hardware to ensure free handle egress.

A comprehensive fire safety upgrade should be undertaken within 6-12 months to align with the findings of this report.

Appendix A: List of Documents Reviewed

<i>Drawing Number</i>	<i>Drawing Title</i>	<i>Revision</i>	<i>Dated</i>
AR-00100	Gen Arrangement Option 1	Po2	<i>11.03.2025</i>
F01	Fire Protection Services Gnd	1	<i>14.08.2006</i>
C476 - 881122	Domestic Water Supply Approved	Approved	<i>15.09.1988</i>
L05	Irrigation plan	NA	<i>May 1987</i>
Syd2228 -E100	Electrical Services Power Layout	P1	<i>May 2022</i>
Syd2228 9-M001	Mechanical Services – Demolition Layout	P1	<i>31.05.2022</i>
Syd2228 9-M001	Mechanical Services – New Works Layout	P1	<i>31.05.2022</i>