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Is a Building used to Store Cars a Carpark?

Purpose

The purpose of this Newsflash is to provide advice as to whether a building used to store cars is defined under the Building Code of Australia (BCA) as a carpark, a storage building, or some other use, and whether a building storing over 40 cars (long or short term) should be sprinklered in accordance with the carpark provisions of the Code.

The Australian Building Codes Board (ABCB) has assisted in the preparation of this Newsflash.

Building Code of Australia (BCA) requirements

The BCA defines a "carpark" as a building "used for the parking of motor vehicles but is neither a private garage nor used for the servicing of vehicles, other than washing, cleaning or polishing". The dictionary defines "park" as "to stop and leave (a vehicle) temporarily" and "to manoeuvre (a motor vehicle) into a space for it to be left". The BCA Guide advises a carpark is "any building not associated with a Class 1 building and accommodates more than 3 vehicles on one storey".

These definitions do not clarify whether a building used to store cars is a carpark or not, therefore it is necessary to refer to the common use definition of carpark.

The BCA treats a building used for public or private parking (open deck or closed) associated with a shopping centre, airport, residential accommodation etc where the public can enter, park their car while they shop, go to work etc, as a carpark. However, a building used to store cars (eg RACQ car storage) is used to store goods that just happen to be cars, and therefore such a building is more appropriately classified as a Class 7 storage or warehouse building.

Likewise, BCA A3.2 classifies a car dealer showroom as Class 6. Most showrooms would typically contain much more than a typical carpark or warehouse in the way of promotional material, displays, combustibles and the like. Also, a museum for the display of vintage cars would be Class 9b.

Whether a car storage building is called a warehouse or carpark has an effect on other BCA requirements besides fire safety. Is it appropriate for a building where cars are stationary to be subjected to the same requirements for ventilation as would a building where cars are constantly moving and producing carbon monoxide? Is it appropriate for carparking spaces in the storage area to comply with AS 2890.1?

There are 3 possible FRL scenarios (except for a Type C building, in which case there is no scenario no. 2):

- 1. Highest FRLs if the building is Class 7 (used for storing cars) but not considered a carpark.
- 2. Midrange FRLs if the building is considered a carpark.
- 3. Lowest FRLs if the building is called a carpark and is open deck or sprinklered.

Research conducted by BHP on open deck and sprinklered carparks for the ABCB justified reduced the FRLs as described in scenario 3. In respect of the difference between scenario 1 and 2, it could be argued that scenario 1 could even be safer and have lower FRLs than scenario 2 because the chance of ignition is less (the cars are stationary and there are less people around, and cars are usually stored with minimal or no fuel). However, the higher FRLs for scenario 1 do permit the storage of goods other than cars (the higher FRLs are the price the building owner pays for increased flexibility in the future use of the building).

On the basis of fire load alone, it would probably be relatively simple to build a case for an alternative solution whereby a building for car storage is a Class 7 non-carpark but has the FRLs allowed for a carpark (provided the goods stored will always be cars).

If the building was used as a "carpark", sprinklers would be required (under the deemed-tosatisfy BCA provisions) where more than 40 vehicles are accommodated. Under Clause C 2.7 (b), however, a part of a building separated from the remainder of the building by a "firewall", may be treated as a separate building for the purposes of the deemed-to-satisfy provisions of Sections C, D and E of the BCA. Hence, each such compartment may be considered a separate "building" not requiring sprinklers if used for parking not more than 40 vehicles. However, each compartment would need to function as a separate building with its own exits, fire fighting facilities, other emergency features and the like.

Should you require further information, please contact Ron de Veer on ph (07) 3237 1232.