Building Code of Australia 2022 and DDA Premises Standards Review - Accessibility Report For SSDA

132 McCredie Rd, Guildford West NSW 2146

Data Centre

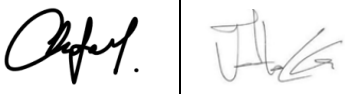
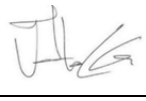
Prepared for: Goodman Property Services

Our Ref: 25000050 | Issue date: 28 February 2025

MBC GROUP

Contents

Report Revision

Revision	Comment / Reason for Issue	Issue Date	Prepared by	Reviewed by
03	Access Report for SSDA Submission – Final update	28-Feb-25	 Jhoana Colorado Access Consultant	 Jhoana Colorado Senior Access Consultant

Revision History

Revision	Comment / Reason for Issue	Issue Date	Prepared by
01	Access Report for SSDA Submission	10-Feb-25	Jhoana Colorado
02	Access Report for SSDA Submission – Minor adjustments	26-Feb-25	Jhoana Colorado
03	Access Report for SSDA Submission – Final update	28-Feb-25	Ngoc Autran

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1 Executive Summary

We have reviewed the development application documentation for State Significant approvals (SSDA) provided for the new data centre located at 132 McCredie Rd, Guildford West, NSW 2164.

The documentation reviewed in this report has been prepared by Greenbox Architects. This report has taken into consideration all aspects of accessibility to the site and throughout the development and with reference to the National Construction Building Code of Australia (NCC BCA), DDA (Access to premises- Buildings) Standards 2010, relevant Australian Standards (AS1428) suite, as these relate to access to premises and the spirit and intent of the Disability Discrimination Act 1992 (Cth) (DDA).

The recommendations in this report are to be developed with the ongoing design development and should be audited and confirmed prior to construction certificate stage. As the design progresses, further review of documentation shall be undertaken to ensure that compliance with the accessibility provisions of the NCC/BCA and relevant standards are achieved.

1.1 Performance Solutions – Accessibility

The assessment of the design documentation has revealed that the following areas or items are departures from the NCC BCA 2022 and are required to be assessed against the relevant Performance Requirements of the NCC BCA 2022. These are as following:

DTS Clause	Description of Non-Compliance	Performance Requirement
D4	There is a lack of compliant access from the allotment boundary to the data centre building principal pedestrian entrance (PPE) in accordance with AS1428.1 required by BCA. This deviation from the NCC/BCA must be addressed through a Performance-Based Solution via provision of accessible car parking bay adjacent to data centre building principal pedestrian entrance (PPE). This is to be detailed at a later stage.	D1P1

The above Performance Based Solution will be subject to consultation and approval by relevant stakeholders as part of the CC process via the performance-based design process (PBDB).

1.2 Exemption Area(s)/Room(s) Under NCC BCA D4D5

The assessment of the documentation has revealed that the following area(s) or room(s) shown in purple colour require further documentation to demonstrate that these areas are inappropriate due to their specific use and present a health risk to people with disabilities. Therefore, they do not comply with the prescriptive provisions of the BCA.

DTS Clause	Location	Exemption Clause
D4	Ground Floor 	D4D5
	Ground Floor 	
	Roof Platform Level 	

This generally applies to plant rooms and other areas used occasionally by maintenance personnel. It should preclude wheelchair access from these areas. Where the above is applicable the client must provide a letter detailing why this is applicable (e.g. store of heavy equipment, furniture, hazard substances, etc) to this building and clearly note locations. Letter to be assessed as part of this OC sign off.
The documentation will need further detailing such as door hardware, construction specifications, services design and manufacturer's details.

Jhoana Colorado
Access Team Lead I Senior Access Consultant

2 Introduction

MBC Group has been engaged by Greenbox Architects to conduct an Accessibility Report.

2.1 Purpose

The purpose of this report is to assess the development documentation at State Significant approvals (SSDA) stage with respect to the accessibility provisions of the National Construction Code – Building Code of Australia Volume 1, Edition 2022), as are principally contained within Parts D4, F4, E2 and DDA (Access to premises- Buildings) 2010 Standards and the Australian Standards suite (AS) as this prescribes the minimum requirement for access to a building. The report is therefore to assess the current design proposal against the above provisions and to outline those areas, if any, where:

- Compliance is not achieved,
- Areas may warrant redesign to achieve compliance.

2.2 Assessment Methodology and BCA

The methodology applied in undertaking this assessment has included the following statutory requirements:

- A review of architectural plans, as listed in listed above, in the report revision section.
- NCC BCA 2022 Detailed assessment of Parts D4, E3 and F4.

2.3 Regulatory Framework

National Legislation

- Disability Discrimination Act, 1992, Government of Australia, https://www.legislation.gov.au/Details/C2022C00367
- Disability (Access to Premises – Buildings) Standards 2010 (DAPBS), https://www.legislation.gov.au/Details/F2010L00668
- Disability (Access to Premises – Buildings) Amendment Standards 2020 Government of Australia, https://www.legislation.gov.au/Details/F2020L01245

Applicable Building Code of Australia (BCA)

The proposed development will be subject to compliance with the relevant requirements of the BCA as in force at the time that the application for the Construction Certificate is made.

In this regard it is assumed that the Construction Certificate application will be made prior to the 1st March 2025, as such this report is based upon the Deemed-to-Satisfy provisions of BCA 2022.

Should the application for Construction Certificate be made after 1st March 2025, this report will be required to be updated to reflect any changes made and now required by the BCA.

Should an out of cycle change occur to the Building Code of Australia, then this report is required to be updated to reflect any applicable changes made and now required by the BCA.

Australian Standards series for Access, Mobility Specific and Guidelines

- AS1428.1:2009 - General Requirements for Access – New Building Work
- AS1428.4.1:2009 - Means to Assist the Orientation of People with Vision Impairment
- AS1428.2:1992 - Design for Access and Mobility- Enhanced and additional requirements – Buildings and Facilities
- AS1735.12:1999 - Lift Facilities for People with Disabilities

NCC BCA – Building Australian Code - 2022 Specific

- Part D4 - Access for People with Disability
- Part F4 - Sanitary and other Facilities
- Part F2 – Passenger Lifts

Reference and Guidelines

- Cumberland Council – DCP
- Guide to the BCA, Current Version, Australian Building Codes Board, www.abcb.gov.au
- Guideline on the Application of The Premises Standards, 2013, Australian Human Rights Commission,

  https://humanrights.gov.au/our-work/disability-rights/guidelines-application-premises-standards
- AS1428.2:1992 Enhanced and Additional requirements

  https://www.saiglobal.com/PDFTemp/Previews/OSH/as/as1000/1400/14282.pdf

- AS1428.4.1 Draft Way-finding Standard
  https://store.standards.org.au/reader/as-1428-4-2-2018?preview=1
- Advisory Note February 2013 on streetscape, public, outdoor areas, fixtures, fittings and furniture, https://humanrights.gov.au/our-work/disability-rights/publications/advisory-note-streetscape-public-outdoor-areas-fixtures

This report aims to provide achievable recommendations related to the provision of access to premises based on current legislation and best practice options, enabling independent, equitable and functional access for all.

The Access is paramount in providing an inclusive environment for all users within the community. The Access Code is focused on ensuring that all users are equally catered for in society.

It is recommended to use the Universal Design principles in all projects as this will ensure a holistic approach in the provision of access for all members of society.

Universal Design Principals (x7)

These principals are recommended to be taken in consideration from the outset of the project and are as follows:

1. **SIMPLE AND INTUITIVE USE** – Use of the design is easy to understand by the users, regardless of the user's experience, knowledge, language skills, or current concentration level. No manuals or protocols are required to achieve this principal. Example: Control buttons on specific equipment for common use (staff and visitors) are labelled with text and symbols that are simple and intuitive to understand.
2. **FLEXIBILITY IN USE** - The design accommodates a wide range of users, preferences and abilities, regardless of the user's physical abilities, age, experience, knowledge, language skills, etc.
   Example: A civic facility that allows a visitor to choose to read or listen to a description of the contents of a display case employs this principle.
3. **EQUITABLE USE** - The design is useful and caters to people with diverse abilities.
   Example: Online content that is designed so that it is accessible to everyone, including visitors, players, spectators; who are blind and using text-to-speech software.
4. **SIZE AND SPACE FOR APPROACH AND USE** - The design provides a clear line of sight to important elements for all users. The design is to be reachable, with all of its components able to be reached comfortably for any seated or standing user. Furthermore, the design requires accommodating a variation for hand and grip size and suitable space/areas for use of assistive devices or personal assistance.
   Example: Adjustable workbenches for visitors, users and adjustable joinery for staff.

5. **LOW PHYSICAL EFFORT** - The design can be used effortlessly.
   Example: Automated doors, windows, lighting, air-conditioning, etc. Sensor doors and basin and sink taps/water mixers.
6. **TOLERANCE FOR ERROR** - The design is useful and can cater to people with diverse abilities, regardless of the user's physical abilities, age, experience, knowledge, language skills, etc.
   Example: Online content that is designed to be accessible to everyone, including students/teachers who are blind or partially blind or visitors/users using text-to-speech software.
7. **PERCEPTIBLE INFORMATION** - The design is efficient in communicating the necessary information successfully to the user.
   Example: Broadcasting television closed captions for user (staff and players) with hearing loss.

2.4 Current National Legislation

The applicable legislation governing the design of buildings in NSW is the Environmental Planning and Assessment Act 1979.

Applicable Building Code of Australia (BCA)
The proposed development will be subject to compliance with the relevant requirements of the BCA 2022 as in force at the time that the Development Application is made.

Disability Discrimination Act 1992 (Cth) (DDA)
The accessibility assessment process covers all aspects of the infrastructure (premises), to the extent required to meet the objectives of the Disability Discrimination Act 1992 (Cth), including, however not limited to, Section 23 which relates to access to premises and facilities which the public may enter or use.

The act is enforced primarily through a complaints mechanism, which allows individuals who have directly or indirectly experienced unlawful discrimination to seek a conciliated outcome through the Australian Human Rights Commission and in the instance of unsuccessful conciliation, to bring an action in the Federal Magistrates Court or the Federal Court of Australia.

The Disability Discrimination Act (DDA) ensures consistent protection against unjust and unfavorable treatment for individuals with disabilities in Australia. It also makes it illegal to discriminate against an "associate" of a disabled person, such as a friend, carer, or family member.

The DDA's broad definition of disability encompasses various conditions, including physical, intellectual, psychiatric, neurological, cognitive, sensory (such as low vision, deafness, or hearing reduction), learning difficulties, physical disfigurement, and the presence of disease-causing organisms in the body. This inclusive definition ensures that all individuals with disabilities are safeguarded by the Act, promoting the principle of

equal fundamental rights for people with disabilities, just like any other member of the community.

The Act applies to a wide range of life activities, spanning access to premises, education, provision of goods and services, employment, and administration of Commonwealth laws and programs.

Whenever a person with a disability wishes to utilize premises, including buildings, outdoor spaces, car parking areas, pathways, and facilities, it is essential to provide equitable and dignified access. The DDA mandates appropriate adjustments to be made to ensure accessibility. If adequate access is not provided, a complaint can be filed under the DDA.

Notably, the DDA takes precedence over State legislation, Standards, and Guidelines concerning disability access matters, reinforcing its pivotal role in upholding accessibility rights for people with disabilities across Australia.

Disability (Access to Premises- Buildings) Standards 2010 – General

The Disability (Access to Premises – Buildings) Standards 2010 were implemented in conjunction with a revised version of the Building Code of Australia (BCA) on May 1st, 2011. As of now, these standards have become legally binding, setting the baseline access criteria for new constructions and major upgrades of buildings throughout Australia.

Part 1, Clause 1.3 Objects

a. "to ensure that dignified, equitable, cost effective and reasonably achievable access to buildings, and facilities and services within buildings, is provided with a disability; and
b. to give certainty to building certifiers, building developers and building managers that, if access to buildings is provided in accordance with these standards, the provision of that access, to the extent covered by these Standards, will not be unlawful under the Act."

In contrast to building regulations, the DDA is not prescriptive. The implementation of the Premises Standards in 2010, and corresponding changes to the BCA, is a significant step towards achieving equal access to premises and is crucial to justice and social inclusion for people with disabilities.

It is noted that the Premises Standards are limited in scope, covering aspects of building compliance applicable under the BCA. It is acknowledged that the Premises Standards could address a broader range of accessibility issues including considerations to accessibility of parkland, playgrounds, transport vehicles, interior fit-out of buildings, and fixtures and fittings. As such, there are features which fall beyond the scope of the standards which may be subject to the general complaint's provisions of the DDA.

According to the Guidelines on the Application of the Premises Standards (produced by the Australian Human Rights Commission, 2011), the Premises Standards serve two primary purposes:

1. To ensure equitable and dignified access for new buildings and areas of existing buildings that undergo renovation or upgrade requiring building approval.

2. To provide clarity to those involved in the design, construction, certification, and management of buildings, outlining the required level of access for buildings falling under the scope of the Premises Standards.

The Premises Standards, outlined in the Access Code within Schedule 1, establish a set of nationally applicable Performance Requirements to enable non-discriminatory access and use of the buildings and areas they cover. They also provide technical Deemed-to-Satisfy Provisions to meet these Performance Requirements.

While the Premises Standards largely align with the BCA and reference various Australian Standards related to access and other relevant matters, they aim to offer certainty to the building industry in fulfilling access requirements for new and upgraded buildings, specifically concerning elements covered by the Premises Standards. However, it's important to note that not all elements and components within buildings and premises fall within the scope of the Premises Standards. The DDA has a broader scope, encompassing more aspects related to accessibility beyond what is covered by the Premises Standards or the BCA.

2.5 SEARS

Section 4 of SEARS has been considered as part of this assessment in relation to BCA compliance and all applicable referenced Australian Standards only.

4. Built Form and Urban Design • Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. • Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. • Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, materials, finishes, colours, any signage and integration of services. • Assess how the development complies with the relevant accessibility requirements.	• Architectural drawings • Design Report • Survey Plan • Building Code of Australia Compliance Report • Accessibility Report

3 Development Description & Assessment Information

3.1 Proposed Development

A State Significant Development Application (**SSDA**) has been prepared in support of a proposed data centre at 132 McCredie Road, Guildford West NSW 2161.
The site is zoned E4 General Industrial and has a road frontage to McCredie Road.
The developable site area is approximately 71,710 sqm.
The proposed development comprises:

- Site preparation works including bulk excavation and removal of existing hard standing and structures on the site, tree and vegetation clearing, and bulk earthworks;
- Construction, fit out and operation of a data centre with an approximate building height of 25.77m and total gross floor area of approximately 29,444 m^2 comprising:
  - At-grade parking for 53 car parking spaces and 2 accessible car parking spaces
  - Two (2) loading dock spaces.
  - Two (2) levels of technical data hall floor space with incorporating a total of nine (9) data halls
  - Ancillary office space
- Provision of required utilities, including:
  - Fuel storage
  - Two (2) Switch-rooms
  - Four (4) industrial water storage tanks
- Vehicle entry and egress driveways located along McCredie Road
- Internal access road
- Associated landscaping and site servicing
- Installation of services and drainage infrastructure.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (**SEARs**) and accompanying cover letter issued for the Project Pluto Data Centre (SSD-69223466) dated 4 April 2024.

Specifically, this report has been prepared to respond to the SEARs requirement issued below:

Item	Description of requirement	Section reference (this report)
Item 4: Built Form and Urban Design	• Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. • Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. • Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, materials, finishes, colours, any signage and integration of services. • Assess how the development complies with the relevant accessibility requirements	Section 4

3.2 The Site

The site is located on Gandangara Land and is in the Smithfield Industrial Area within the Cumberland Local Government Area (LGA). It is bounded by McCredie Road to the north.

The front part of the site adjoins the Guildford Transmission Substation, which is located immediately to the east and fronts onto McCredie Road. Other industrial uses are located further east, with residential properties beyond.

The Guildford West Sports Ground, which comprises several playing fields, is located to the south of the Guildford Transmission Substation. The playing fields bound the southern part of the site to the east. The playing fields / public recreation area also abut the southern boundary of the site.

Prospect Creek is located to the south of the public recreation area and is zoned C2 Environmental Protection. The area to the south of Prospect Creek is predominately characterised by low density single storey residential housing.

The site is located in the south eastern corner of the Smithfield Industrial Estate and is within close proximity of the Cumberland Highway (A28) and M4 and M7 motorways, which provide access to Sydney CBD, western Sydney and the south. A range of large format industrial uses are located to the west and north west of the site. The Smithfield Industrial Estate extends across the A28 to Gipps Road (approximately 3km west of the site). It forms part of the broader Smithfield Wetherill Park industrial area, which is one of the largest of its kind in the Southern Hemisphere and makes a significant contribution to the New South Wales and Australian economies.

The site has a net developable area of 71,710 sqm and is currently vacant. It previously operated as a Castrol Lubricants facility. However, the majority of the site has now been cleared and subject to category 1 remediation works. A single storey office building is located on the northern portion of the site fronting McCredie Road. The building is vacant.

Staging

The proposal seeks consent for development to be constructed and operated in two phases to reflect the staged availability power supply. The proposed stages involve the following:

Stage 1: Construction of the main data centre building as well as the car park, perimeter access road, site access/exit driveways and landscaping. Stage one will involve the fit-out and operation of five of the 9 proposed data halls at levels 1 and 2 as well as the associated electrical rooms, generators, storage and office rooms.

Stage 2: Completion of the ultimate development scheme involving the extension of the building to the south with an additional four data halls, associated electrical rooms and generators, and associated landscaping and external works. The electrical substations will also be constructed in the north of the site during this phase.

The works are to be completed in four (4) construction stages, as per below:

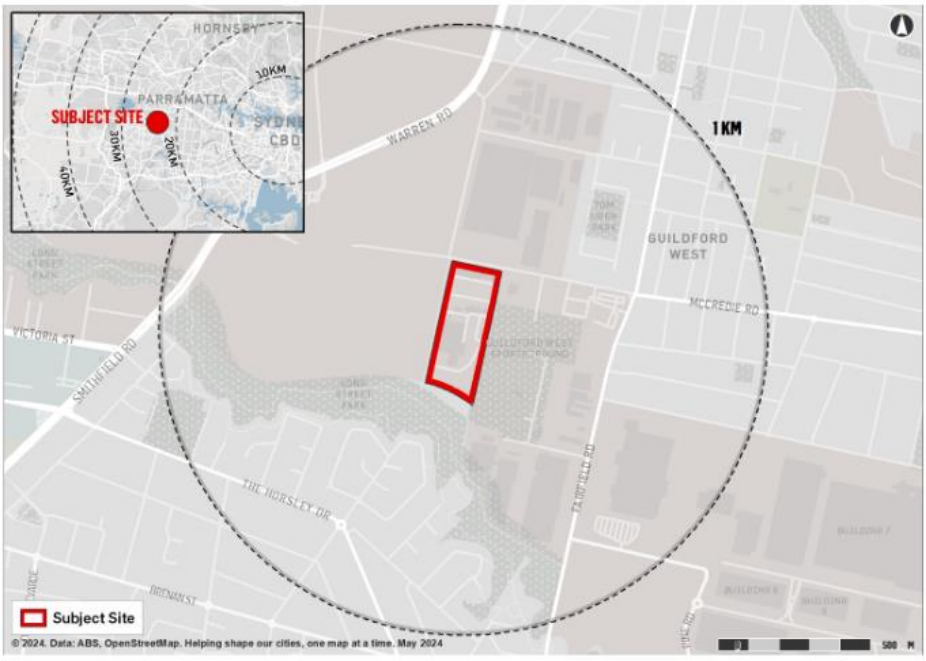
Stage 1:
- CC1 – Site Preparation works (including but not limited to vegetation removal, earthworks & piling, installation of footings, retaining walls)
- CC2 – Inground services installation, structural works
- CC3 – Façade construction, installation of services, fit out
- CC4 – Landscaping and external works

Stage 2:
- CC1 – Site Preparation works (earthworks & piling, installation of footings)
- CC2 – Inground services installation, structural works
- CC3 – Façade construction, installation of services, fit out
- CC4 – Landscaping and external works

Figure 1 Site Aerial

Source: Urbis, 2024

Figure 2 Local Context



Source: Urbis, 2024

Methodology

The methodology section is to describe how the consultant has undertaken their assessment. This section can naturally be adapted to suit the requirements of the technical assessment and nature of the specific consultant report, however the methodology used should be clear enough for the planning authority to understand and consider.

Assessment and findings
Outline results of the technical assessment. e.g. compliance with the relevant standards or performance measures, exceedances of the cumulative noise impact standards, potentially serious and irreversible impacts on a specific fauna species, significant economic benefits for the region.

Cumulative impacts
Each report for the SSDA should 'stand on its own' in terms of merit assessment. However, the VIA, Traffic, Air Quality, Acoustic and Flooding / Stormwater reports (and any other reports where considered necessary) must also address the cumulative impacts of the proposal with other nearby development. A section in these reports must be provided that addresses the cumulative impacts of the proposal.

Urbis has identified the projects in the table below as potentially of relevance to the cumulative impact assessment. Each of the aforementioned consultants must consider these developments and any other projects that may be relevant to the cumulative impact assessment. The cumulative impact assessment must be undertaken in accordance with DPHI's Cumulative Impact Assessment Guidelines.

Site	Development Application Reference No.	Development Description	Decision	Decision Date
Smithfield Recycling Centre – 132 - 144 Warren Road, Smithfield	SSD-19425495	Use of an existing warehouse (operating 24 hours 7 days a week) to receive up to 150,000 tonnes per annum of domestic and commercial recyclable materials and sort these materials into categories for transportation to dedicated reprocessing facilities	Approved	20/12/24
Smithfield Battery Energy Storage System – 6 Herbert Place, Smithfield	DA94/165-Mod-3	Removal of disused combined cycle gas turbine infrastructure including the steam turbine generator and four cell cooling towers. Installation and operation of new replacement of cooling system.	Approved	09/04/2024
250 Victoria Street, Wetherill Park (Woolworths WDC Wetherill Park	SSD-15221509	Construction and operation of a warehouse and distribution facility in Wetherill Park for handling chilled and fresh products	Awaiting determination (response to submissions stage)	NA
Cobra Waste Solutions Resource Recovery Facility	SSD-9320662	Operation of a Resource Recovery Facility to process up to 150,000 tonnes per annum of general solid waste (non-putrescible) consisting of construction and demolition waste and commercial and Industrial waste.	Approved	17/11/2023
68 Victoria Street, Smithfield	PPSSWC-390	Waste or resource transfer station	Under Assessment	NA
81 Byron Road, Yennora	SSD-59076719	The project seeks approval to facilitate the future transformation of the current facility into a modern multistorey warehouse and distribution facility. It is currently at the EIS preparation stage. Through this application, the applicant seeks to amend the existing consent under DA 264-09-01.	Preparation of EIS.	NA
15-21 Britton Street & Amp; 28-54 Percival Road, Smithfield	SSD-67368956	Demolition of on-site structures, construction and 24/7 operation of a multi-level warehouse and distribution centre, comprised of 3 buildings connected by hardstand, 2-3 storeys in height, gross floor area of 108,896 m2, and ancillary offices.	Awaiting Determination (response to submissions stage)	NA
7 Long Street, Smithfield	SSD-72775222	Upgrade to an existing Sludge Dewatering Plant to increase the processing capacity from	Preparation of EIS	NA

Site	Development Application Reference No.	Development Description	Decision	Decision Date
		46,720 tpa of drill mud to 300,000 tpa of sludge, groundwater, GSW soils, virgin excavated natural material (VENM) and excavated natural material (ENM).		

Mitigation measures

This should outline any mitigation measures required to manage any impacts resulting from the proposed development. All mitigation measures should be clearly understood and it should be clear whether the mitigation measures have been incorporated into the design, or would need to occur as a condition of consent during the detailed design phase.

Conclusion

There are not remaining impacts associated with DDA/Access the proposed development are appropriate and acceptable.

3.3 Use and Building Class – Accessibility

In the context of this report and the BCA the building use can be classified as follows;

Certification	Descriptions	Access Requirements
Class 5	Office	Access is required -to and within all areas normally used by the occupants.
Class 7a	Carpark	Access is required -to and within all areas normally used by the occupants.
Class 7b	Data Centre/Plant room	Access is required -to and within all areas normally used by the occupants.

4 Mandatory Requirements Accessibility Assessment & Recommendations for Access for People with a Disability

The following details the accessibility compliance of the proposed development. The assessment is limited to the significant issues ascertainable from the current level of design detail. Further detailed assessment will be required at the Detailed Design Stage/construction Certificate Stage to demonstrate full compliance with the relevant access provisions.

4.1 NCC BCA Part D4D3 –Access to Buildings (Site Connections)

An accessway to the building must be provided with a continuous accessible path of travel (CAPT) compliant with AS1428.1. Specific components are as follows:

- from the main points of a principal pedestrian entry (PPE) to the allotment boundary; and
- from another accessible building (new or existing) connected by a pedestrian link; and
- from any required accessible carparking space (new or existing) on the allotment.

Compliance Comments
○ All new/existing floor finishes will provide transitions 3-5mm maximum. ○ All new pathways are to ensure 1:40 maximum gradient and cross falls. ○ If new areas provide floor level differences, ensure step ramp is provided in accordance with AS1428.1. ○ There is a lack of access from the allotment boundary. This is a departure to be address under a Performance Solution. Refer to item 1.1 for further information. ***The proposal can readily achieve compliance with the BCA Accessibility provisions and DDA.***

4.2 NCC BCA Part D4D3 – Access to Buildings (Entrances)

In a building required to be accessible, an accessway compliant with AS1428.1 must be provided through the principal pedestrian entrance (PPE), and;

- through no less than 50% of all pedestrian entrances including the principal pedestrian entrance; and
- in a building with a total floor area more than 500 m2, a pedestrian entrance which is not accessible must not be located more than 50 m from an accessible pedestrian entrance, except for pedestrian entrances serving only areas exempted by D4D5 (service maintenance areas former D3.4 Clause).

Where a pedestrian entrance required to be accessible has multiple doorways, these are to be accessible and;

- if the pedestrian entrance consists of no more than 3 doorways — no less than 1 of those doorways must be accessible; and
- if a pedestrian entrance consists of more than 3 doorways — no less than 50% of those doorways must be accessible.

For the purposes of (3); an accessible pedestrian entrance with multiple doorways is considered to be one pedestrian entrance where—

- all doorways serve the same part or parts of the building must comply with AS1428.1; and
- the distance between each doorway is not more than the width of the widest doorway at that pedestrian entrance; and

A doorway is considered to be the clear, unobstructed opening created by the opening of one or more door leaves.

- Where a doorway on an accessway has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- A single door is to ensure a clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.

A ramp complying with AS 1428.1 or a passenger lift need not be provided to serve a storey or level other than the entrance storey in accordance with NCC BCA D4D4.

Where there are level differences between internal and external areas. Threshold ramp is to be provided in accordance with AS1428.1.

Compliance Comments
○ Ensure all new doors in the continuous accessible path of travel (CAPT) are in accordance with AS1428.1 Fig 31 and 32. This includes 530mm internal and 510mm external latch side clearances. ***The proposal can readily achieve compliance with the BCA Accessibility provisions and DDA.***

4.3 Continuous Accessible Path of Travel (CAPT)

A continuous accessible path of travel is defined as an uninterrupted pathway to and from within a premises or building environment which provides linkage to all programs, goods and services within a premises or building. Therefore, the following items are located via this pathway.

- All continuous accessible paths of travel are to ensure compliance with AS1428.1. Clause 7 with 1-metre minimum clear circulation and 2.1-metres above FFL.
- Where a manual doorway on an continuous accessible path of travel (CAPT) has multiple leaves, (except an automatic opening door) one of those leaves must have a clear opening width of not less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- Where manual door latch side cannot be achieved, the door is to be automated.
- A single manual door on an continuous accessible path of travel (CAPT) is to ensure a clear opening width of no less than 850 mm with standard 920mm door leaf in accordance with AS 1428.1 Figures 31 and 32.
- Doorway threshold ramp is to have a 1:8 gradient, 35mm max. height and 280mm max. length, compliant with AS1428.1. (Note: No threshold ramps are allowed inside of the building under the BCA unless open to a road, open space or are in a building class 9b)
- The distance between successive doorways in a vestibule serving an area required to be accessible is to be 1450mm (excluding the swing doors)
- 2000mm L x 1800mm W (passing bay) is to be provided where there is no line of sight (2-way corner/ L shape)
- 1500mm x 1500mm (+splay) clear circulation space is to be provided to achieve 90-degree turn.
- 2-metre length or over corridors are to provide 1540mm x 2070mm minimum clear circulation space to achieve 180-degrees.

Compliance Comments
The proposal can readily achieve compliance with the BCA Accessibility provisions and DDA.

4.4 Stairs (Common Use)

Every ramp and stairway, except for ramps and stairways in areas exempted by D4D5 (service maintenance areas former D3.4 Clause), must comply with—

- for a stairway, except a fire-isolated stairway, Clause 11 of AS 1428.1 ; and
- All stairs and ramps are to be 900mm offset from the allotment boundary in accordance with AS1428.1.
- All stairs are to allow suitable space for handrail extensions to be provided during a later stage. (No protrusion will be allowed at detail design stage).
- All stairs adjacent to doors are to ensure 1450mm front approach level landings.
- All stairways are to ensure a minimum 1200mm overall width and 1-metre minimum clear circulation in accordance with AS1428.1.
- Stairs middle landings are to ensure an off-set tread is provided.

Compliance Comments
○ Ensure all stairs provide at middle landing off-set tread. ***The proposal can readily achieve compliance with the BCA Accessibility provisions and DDA.***

4.5 Lifts – BCA Part E3D7 and D3D8 & AS1735.12

New lifts required to be accessible must comply with BCA E3D7 and D3D8 and relevant parts of AS1735.12.

Lift is to have floor minimum dimensions as follows:

- Passenger lifts which travel less than 12m requires floor size of 1100mm by 1400mm. Passenger lifts which travels 12m or above requires floor size of 1400mm by 1600mm.
- Lift lobbies are to ensure 2000mm x 1800mm minimum clear circulation space (to achieve passing bay that allows two users to pass each other, E.q Wheelchairs, prams, large goods, etc.

Compliance Comments
The proposal can readily achieve compliance with the BCA Accessibility provisions and DDA.

4.6 Sanitary and other Facilities F4D5

Unisex Accessible Toilets (USAT) and Ambulant Facilities

- Classes 6: Provide at least 1 unisex accessible toilet, adjacent to every bank of toilets on each storey, compliant with AS1428.1 under NCC BCA and DDA Premises Standards Part F4. If there is more than 1 toilet bank of toilets on each level, an accessible toilet is required at 50% min. of toilet banks on each level.
- An accessible unisex sanitary compartment must contain a closet pan washbasin, shelf or bench top and adequate disposal of sanitary towels.
- A minimum size of a combined unisex accessible toilet (USAT) and shower facility room is to be 2300mm X 2630mm, to accommodate circulation to the pan (1900mm x 2300mm) and the shower facility.
- Circulation spaces, fixtures and fittings of all accessible sanitary facilities must comply with AS1428.1
- Door circulation is to ensure compliance with AS1428.1 Fig.31 or 32 or door is to be automated.
- An accessible unisex facility must be located so that it can be entered without crossing an area reserved for one gender.
- Where male and female facilities are separate, a unisex facility is only required at one location.
- Accessible unisex sanitary compartment or shower need not be provided on a storey that is not required to be provided with a lift or ramp access

- The distance between successive doorways in a vestibule serving an area required to be accessible is to be 1450mm (excluding door swing)
- Accessible facilities must meet the requirements of Section 15 of AS1428.1
- At each bank of toilets where there is one or more toilets, in addition to an accessible unisex sanitary compartment provided at that bank, a sanitary compartment suitable for a person with an ambulant disability must also be provided for use by males and females.
- The ambulant facilities must comply with the requirements of Clause 16 of AS1428.1:2009. This includes 900mm x 900mm clear circulation spaces in front of the pan, outside of the cubicle and at the entry door (this is to exclude the door swing)

Compliance Comments
The proposal can readily achieve compliance with the BCA Accessibility provisions and DDA.

4.7 Communal and Exempted Areas – BCA D4D5

Under the DDA Premises Standards and BCA all common use rooms normally used by occupants of the building are to be accessible, except areas exempt under BCA D4D5 (former D3.4) Services /maintenance only use areas, which are areas where access would be inappropriate because of the particular purpose for which the area is used or that would pose a health or safety risk for people with a disability.

- Accessibility is required to common use terraces, open/outdoor spaces within buildings.

Compliance Comments
○ Ensure all commonly use admin areas are accessible in accordance with AS1428.1. ○ For exempted areas refer to ***The proposal can readily achieve compliance with the BCA Accessibility provisions and DDA.***

4.8 Carparking Spaces for People with Disabilities - BCA Part D4D6

Carparking Spaces for People with Disability are to be provided in accordance with Table D3.5 of the Disability (Access to Premises Standards) and NCC BCA, therefore:

- Class 9b – 1 space for every 100 carparking spaces

Compliant AS/NZS 2890.6 Accessible car parking bays must achieve:

- 2.4-metres W x 5.4-metres L, with shared area of 2.4-metres W x 5.4-metres l and rear shared area 2.4-metres.
- The overhead clearance of 2.5metres (parking bay and shared areas) and 2.2-metres overhead path of travel.
- Accessible car parking bay and shared areas are to ensure 1:40 maximum gradient or 1:33 if bitumen.

- Accessible car parking bay and shared areas are to ensure 1:40 maximum gradient or 1:33 where bitumen surface is provided.
- Accessible car parking bay is to be close to automated doors, principal pedestrian entrances (PPE) and passenger lifts. This is to minimise travel distance and potential hazard.
- Accessible car parking bay is to ensure the provisions of compliant continuous accessible path of travel (CAPT) in accordance with AS1428.1 Cl.7 to and from automated doors, principal pedestrian entrances (PPE) and passenger lifts.

Compliance Comments
○ If there is a level difference between proposed accessible path of travel and building entry lobby. Ensure this is address with an access ramp in accordance with AS1428.1. ***The proposal can readily achieve compliance with the BCA Accessibility provisions and DDA.***

5 Conclusion

This report has reviewed the documentation submitted for the new data centre at 132 McCredie Rd, Smithfield NSW 2164.

The evaluation was conducted in accordance with the development applicable provisions for "Access for People with Disabilities". Based on the proposed documentation provided, it has been identified that the current design effectively addresses the necessary accessibility requirements at this stage. The design demonstrates a high level of feasibility in achieving these accessibility goals. This is to be verify at the next stage for consistency.

6 Appendix A - Author Credentials

DDA/Accessibility Consultant
MBC Group

Access Team Lead I Senior Access Consultant

QUALIFICATIONS & MEMBERSHIPS

Bachelor of Architecture
Master of Advance Architecture in Design Technologies (MAdvArch) at UTS
Royal Australian Institute of Architects Associate Member - (RAIA) No.205445
Access Consultants Association Associate Member - (ACA) No.713

SPECIAL EXPERTISE

- Schematic/Concept Design
- Development Design
- Detailed Design & Documentation
- Construction Inspections
- Expert Reports
- Specialist DDA Audits

SELECTED DDA/ACCESSIBILITY AUDITS PROJECTS EXPERIENCE

- 2024 - Ausgrid Somersby Warehouse,
- 2024 - 2-8 Lanceley Place Artamon - Data Centre,
- 2024 - Glendernning Road- Data Centre,
- 2023 - Lot 104 Gimberts Road, Morrisset,
- 2023 - 38 Pine Road, Yennora NSW – DDA Audit,
- 2023 - 28 McPherson Street, Banksmeadow NSW,
- 2022 - 273-283 Hume Highway, Greenacre, NSW2
- 190-HeartlandHyundai,
- OC Signoff 2022 - 23-69 Grady Crescent, Erskine Park NSW,
- 2022 - 202 Euston Road, Alexandria - Industrial Park,
- 2022 - 74 Edinburgh Road, Marrickville and
- 2021 - Lot 2, 290-312 Annangrove Road - Rouse Hill, NSW - Industrial Development

EXPERIENCE

Jhoana is a Senior DDA/Access Consultant at MBC-Group, specializing deeply in the critical field of accessibility. With over 5 years dedicated to access consulting and a robust decade-long career in architecture, she brings a profound understanding of architectural principles and a comprehensive knowledge of accessibility legislation. Her keen insight into the foundational reasons behind access standards enables her to offer targeted, effective guidance throughout the planning, design, and construction phases of various projects.

Dedicated to ensuring universal accessibility in facilities for individuals with disabilities, Jhoana excels in incorporating practical access features throughout the built environment. Her strategy is rooted in the principles of Universal Design (UD) and inclusive design, emphasizing the seamless integration of accessibility into every aspect of the architectural process. Additionally, Jhoana is a specialist in DDA/Access audits for educational projects, ensuring that learning environments are inclusive and accessible to all.

EXPERIENCE

Jhoana is a Senior Access Consultant at MBC-Group, and her interest is mainly in accessibility, universal (UD) and inclusive design. Combined with her background in architecture, she ensures that access and architecture are integrated seamlessly and successfully in all her projects.

Jhoana has been featured in the ACA (Former ACAA) and ACCESS Insight Winter 2024. You can read her work in the article titled "Enhancing Accessibility: The 2022 Reform of Australia's Transport Accessibility Standards" here: ACCESS Insight Winter 2024.

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