



STEVE WATSON  
& PARTNERS

**Proposed Warehouse and Distribution Centre**  
**221 – 235 Luddenham Road, Orchard Hills**

**BCA Statement of Compliance**  
Reference 2024/3153 R1.3

**HBB Property**  
5<sup>th</sup> June 2025



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## Project Contacts

**Client:** HBB Property

**Architect:** Nettletontribe Architects

## SWP Quality System

Job Number/Ref: 2024/3153      Revision Number: R1.3      Issue Date: 5<sup>th</sup> June 2025

## Revision History

Rev No	Date	Revision Details	Author	Verifier
R1.0	23/03/25	Short form BCA Statement of compliance for submission to accompany the SSDA application to the Department of Planning	Joshua Hawke	Mathew Kanaan
R1.1	16/04/25	Updated and final report to reflect the SSDA submitted design and Stakeholder Comments	Joshua Hawke	Mathew Kanaan
R1.2	24/04/25	Updated and final report to reflect the SSDA submitted design and Stakeholder Comments	Joshua Hawke	Mathew Kanaan
R1.3	05/06/25	Final Report for SSDA Submission	Joshua Hawke	Mathew Kanaan

### Disclaimer:

This report is based on a desktop audit of preliminary DA documentation only.

Details contained in the report address issues of significance to broad BCA compliance relevant to this stage of design resolution.

This report is based on a review of the DA design documentation only. It represents a compliance report for “documentation to this point in time” and will be subject to amendment and further detailed assessment at the Construction Certificate stage.



## Introduction

Steve Watson & Partners has been commissioned by HBB Property to prepare this report in accordance with the technical requirements of the Secretary’s Environmental Assessment Requirements (SEARs), and in support of the State Significant Development Application (SSD-81434988) for a new Storage and Distribution Warehouse within the Alspec Industrial Business Park (AIBP) at 221-235 Luddenham Road, Orchard Hills (**the site**).

An assessment of the proposed design has been undertaken against the Deemed-to-Satisfy (DtS) provisions of the relevant sections of the Building Code of Australia 2022 (Amendment 1) and the applicable Building Regulations.

## Description of the site and locality

The site is located at 221-235 Luddenham Road, Orchard Hills within the Penrith Local Government Area (LGA). The existing site is legally described as Lot 1 DP1293805 however the proposed warehouse will be designated as lot 11 in the new community subdivision plan (DP271602) following completion of the estate subdivision.

The site is identified in the figure below.



Source: Urbis 2025

It is important to note the broader site is known as the Alspec Industrial Business Park (AIBP) and is subject to another SSD and multiple DAs seeking approval for medium to large format industrial warehouses.

## Assessment Requirements

The Department of Planning and Environment (DPE) has issued Secretary’s Environmental Assessment Requirements (SEARs) to the applicant for the preparation of an Environmental Impact Statement (EIS) for the proposed development. This report has been prepared having regard to the SEARs as follows:

Environmental Assessment Requirement
<p><b>4. Built Form and Urban Design</b></p> <p>The EIS must:</p> <ul style="list-style-type: none"> <li>Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach.</li> <li>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.</li> <li>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.</li> <li>Assess how the development complies with the relevant accessibility requirements.</li> </ul>



## Purpose

The purpose of this report is for the purpose of, and to the extent necessary for, submission with the State Significant Development Application to the Department of Planning under Part 4 of the Environmental Planning and Assessment Act. The report provides an assessment of the proposed design against the Deemed-to-Satisfy (DtS) provisions of the relevant sections of the Building Code of Australia 2022 (Amendment 1) and the applicable Building Regulations.

## Limitations

This report and associated compliance advice is not intended or permitted to be relied on by any other party with respect to their obligations to ensure compliance, including but not limited to the issue of a Construction Certificate issued under Part 6 of the Environmental Planning and Assessment Act 1979.

## Overview of Proposed Development

The SSDA seeks consent for the design, construction and operation for a Storage and Distribution Centre. The project seeks to deliver a new a new Storage and Distribution Warehouse within the Alspeck Industrial Business Park (AIBP).

Specifically, the project comprises the following:

- Construction of a new warehouse with a two-level ancillary office. The warehouse is predominantly 14.7 metres in height, with a high-bay warehouse component at the western portion of the building which achieves a maximum height of 39 metres.
- A total building area of 45,512sqm; broken down as follows:
  - Warehouse area: 43,607sqm
  - Office Area: 1,905sqm
- Loading areas at the north and south sides of the warehouse, with hardstand surrounding the perimeter of the warehouse. Hardstand and carpark areas are accessed via four new driveways from the AIBP internal estate road.
- Provision of vehicular parking onsite to accommodate cars, vans, semi-trailers and B-doubles. It is envisaged that approximately 329 spaces will be provided on site within the proposed hardstand and carparking areas.
- Perimeter landscaping and tree planting with a total area of 10,236sqm (10%).





## Summary of BCA Parameters

<b>Building Use:</b>	Office, Warehousing / Distribution and Ancillary Structures
<b>Class of Occupancy:</b>	Class 5, 7b & 10b
<b>Type of Construction required:</b>	Type B <i>Note – The building has been assessed as a Large Isolated Building</i>
<b>Rise in Storeys:</b>	3 Storeys
<b>Effective Height:</b>	8.1m (Mezzanine 2 (RL54.600) – Ground (RL46.500))
<b>Overall building height</b>	39.0m (Roof Ridge (RL85.500) – Ground (RL46.500))

## Assessment

Steve Watson and Partners have undertaken a review of the proposed design that forms part of the application to the Department of Planning. We confirm the design as shown on the drawings referenced at the end of this document can achieve compliance with the BCA2022 (AMENDMENT 1) and the Disability (Access to Premises – Buildings) Standards 2010.

Compliance is proposed to be achieved by satisfying the relevant DtS provisions and where necessary other aspects of the design may need to be addressed by way of Performance Solutions to meet the relevant Performance Requirements of the BCA. Such solutions proposed on this development will be provided by an Accredited Fire Engineer, BCA Consultant as well as an Accredited Access Consultant.

Further regulatory reviews will need to be progressively undertaken as the design develops to ensure compliance is achieved.

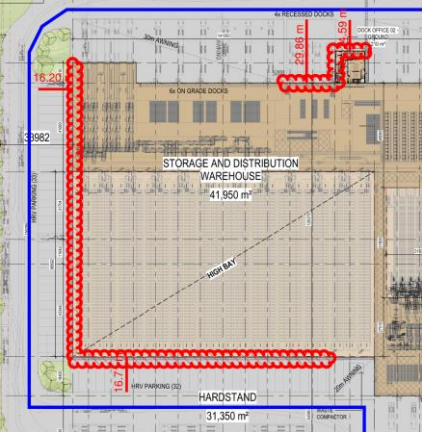
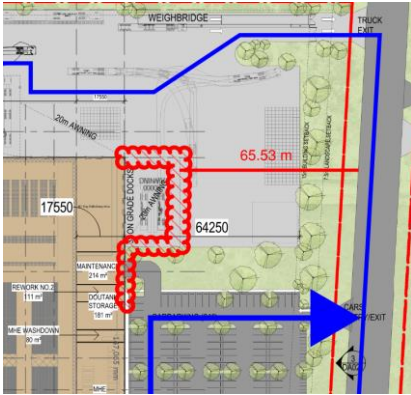
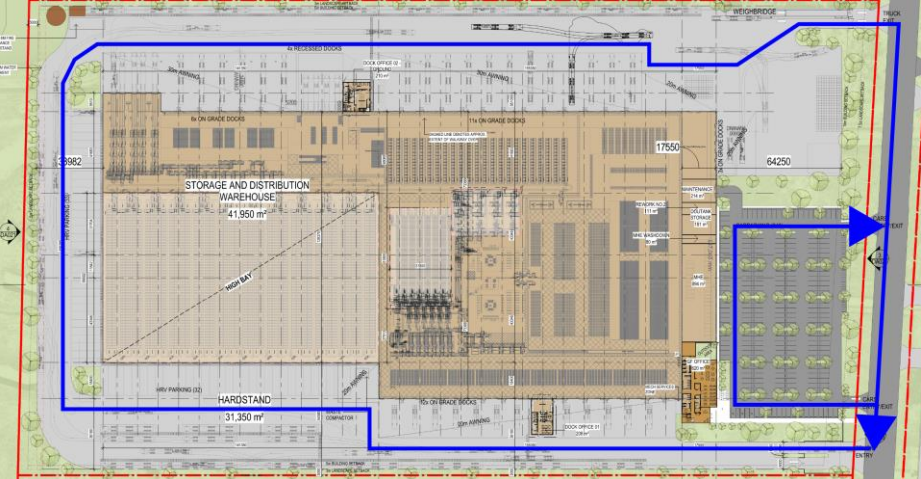
Further detailed reviews will be undertaken by Steve Watson and Partners to verify compliance through the design development phase of works including at the design issued prior to the issue of a Construction Certificate.

## Proposed Performance Solutions

It is anticipated that the following Performance Solutions will need to be addressed and will require further input by the projects stakeholders such as Fire & Rescue NSW.

Item	Non-Compliance	DTS Clause	Description	Performance Requirement
1.	<b>Type of Construction</b>	<b>C2D2, C2D10, C2D14 &amp; Spec 5</b>	Performance based assessment to justify Type C construction Requirements in lieu of Type B requirements.	C1P1 & C1P2
2.	<b>General Floor and Volume limitations &amp; large isolated building</b>	<b>C3D3 &amp; C3D4</b>	The fire compartment sizes exceed the requirements of C3D3 and the building is being treated as a large isolated building under a wholistic fire engineered performance solution.	Note
3.	<b>Requirements for open spaces and vehicular access</b>	<b>C3D5</b>	The following departures associated with the perimeter vehicle access are as follows: <ul style="list-style-type: none"> <li>The vehicular perimeter access road is greater than 18m from the building <ul style="list-style-type: none"> <li>Western elevation to the high bay warehouse - Up to 22.5m when inclusive of the 6m perimeter path.</li> </ul> </li> </ul>	C1P9



Item	Non-Compliance	DTS Clause	Description	Performance Requirement
			<ul style="list-style-type: none"> <li>○ Southern elevation to the high bay warehouse - Up to 22.5m when inclusive of the 6m perimeter path.</li> <li>○ Northern elevation to the high bay warehouse - Up to 36m when inclusive of the 6m perimeter path.</li> </ul>  <ul style="list-style-type: none"> <li>○ Eastern elevation to the Keg Palletising Area - Up to 72m when inclusive of the 6m perimeter path.</li> </ul>  <ul style="list-style-type: none"> <li>● Security gates are also proposed to cross the vehicular access path where the vehicular access road connects to the public road.</li> </ul>	
				



Item	Non-Compliance	DTS Clause	Description	Performance Requirement								
4.	Exit Travel Distances & Distance Between Alternative Exits	D2D5 & D2D6	<p>The following areas have been identified with distances exceeding 20m / 40m / 60m in lieu of the permissible distances required under DTS provisions:</p> <table border="1"> <thead> <tr> <th>Level</th> <th>Distance</th> </tr> </thead> <tbody> <tr> <td>Warehouse</td> <td><b>30 / 100 / 200 in lieu of 20 / 40 / 60</b></td> </tr> <tr> <td>Office Ground Floor</td> <td><b>DTS at 20 / 40 / 60</b></td> </tr> <tr> <td>Office Level 1</td> <td><b>25 / 45 / 60 in lieu of 20 / 40 / 60</b></td> </tr> </tbody> </table>	Level	Distance	Warehouse	<b>30 / 100 / 200 in lieu of 20 / 40 / 60</b>	Office Ground Floor	<b>DTS at 20 / 40 / 60</b>	Office Level 1	<b>25 / 45 / 60 in lieu of 20 / 40 / 60</b>	D1P4 & E2P2
Level	Distance											
Warehouse	<b>30 / 100 / 200 in lieu of 20 / 40 / 60</b>											
Office Ground Floor	<b>DTS at 20 / 40 / 60</b>											
Office Level 1	<b>25 / 45 / 60 in lieu of 20 / 40 / 60</b>											
5.	Width of exits and paths of travel to exits	D2D8 & D2D10	Zones throughout the mechanical plant contain areas in which the required path for maintenance personnel to be down to widths of 600mm in lieu of 1000mm.	D1P4, D1P6 and E2P2								
6.	Travel by non-fire-isolated stairways or ramps	D2D14	<p>The following departures affiliated with the use of the non-fire isolated stairs are to be addressed through means of a performance basis:</p> <ul style="list-style-type: none"> <li>A travel distance where a point of choice is available at the bottom of the non-fire isolated exit exceeds 40m to reach the road / open space</li> <li>An overall travel distance from the mezzanine levels exceeds 80m to reach the road / open space</li> <li>A discontinuous means of travel is applicable via each the non-fire isolated stairs serving the mezzanine where occupants need to traverse to an additional non-fire isolated exit in lieu of directly discharging to a road or open space;</li> </ul>	D1P4, D1P5 & E2P2								
7.	Fire Hydrants	E1D2	<p>The following departures associated with the hydrant design are to be addressed through means of a performance basis:</p> <ul style="list-style-type: none"> <li>Hydrants located under the roofed awnings over are to be considered as external hydrants for the purpose of fire hydrant coverage.</li> <li>The provision and use of internal fire hydrants which are additional to the initial attack are not permitted under AS2419.1-2021. Clause 3.6.3 of AS2419.1-2021 only provides a concession for class 2, 3 &amp; part 4 buildings. As such a performance solution needs to be used to address the use of any additional internal fire hydrants where coverage is not achieved from the external dual pillar outlets.</li> <li>As the building contains a total volume of more than 108,000m<sup>3</sup> then the provisions associated with Appendix C of AS2419.1-2021 need to be assessed</li> <li>Consideration of other requirements that the Services Engineer may require that falls short of meeting DTS requirements are to also be discussed and considered through the projects fire engineer.</li> </ul>	E1P3								
8.	Fire Hose Reel	E1D3	A performance solution is proposed for the use of 50m Fire Hose Reels in lieu of 36m fire hose reels due to the large floor areas of each warehouse tenancy and the central dispatch hardstands, hose to ensure coverage is achieved.	E1P1								



Item	Non-Compliance	DTS Clause	Description	Performance Requirement
9.	<b>Sprinklers</b>	<b>E1D4</b>	<p>The following departures associated with the sprinkler design are to be addressed through means of a performance basis:</p> <ul style="list-style-type: none"> <li>• BCA Clause E1.5 requires that the fire sprinklers to be installed in accordance with AS2118.1:2017 of which under Clause 4.14.1 and 4.14.2, the fire sprinkler booster assembly and tank suction connection respectively must be in accordance with the requirements of the fire hydrant standard being AS2419.1:2021. The sprinkler booster is installed to the South-East of the building and not: <ul style="list-style-type: none"> <li>○ Located on the site boundary; and</li> <li>○ Adjacent to the principal vehicle access; and</li> <li>○ Within sight of the building main entrance; and</li> </ul> </li> <li>• Omission of sprinklers to the MSB located on the ground floor.</li> </ul>	E1P4
10.	<b>Smoke Hazard Management - Buildings not more than 25 m in effective height: large isolated buildings subject to C3D4</b>	<b>E2D10</b>	<p>The following performance solutions to be addressed by the fire engineer projects apply to the warehouse associated with the site:</p> <p><u>Main Offices, Dock Offices, Warehouse Amenities and other Ancillary Areas</u></p> <ul style="list-style-type: none"> <li>• Automatic smoke exhaust is to be omitted from the Main Offices, Dock Offices, Warehouse Amenities and other Ancillary Areas.</li> <li>• No smoke detection will be provided to the Main Offices, Dock Offices, Warehouse Amenities and other Ancillary Areas.</li> </ul> <p><u>Warehouse Areas</u></p> <ul style="list-style-type: none"> <li>• An automatic smoke exhaust system shall be provided to the warehouse areas of the building in accordance with the DTS provisions and AS1668.1:2015 with the following exceptions: <ul style="list-style-type: none"> <li>○ A smoke extraction rate of 1 air change per hour shall be achieved in lieu of extraction rates defined in BCA Specification 21.</li> <li>○ The warehouse shall form a single smoke reservoir resulting in a zone exceeding 2,000m<sup>2</sup>.</li> <li>○ The automatic smoke exhaust system shall initiate from sprinkler activation in lieu of smoke detector activation.</li> <li>○ No smoke detection will be provided to the warehouse areas.</li> </ul> </li> <li>• Consideration of other requirements that the Services Engineer may require that falls short of meeting DTS requirements are to also be discussed and considered through the projects fire engineer.</li> </ul>	E2P2
11.	<b>Design and operation of exit signs</b>	<b>E4D8 &amp; AS2293.1-2018</b>	<p>A performance solution is required to be obtained through the projects fire engineer to address having exit signage installed to a height greater than 2.7m from the finished floor level within the warehouses.</p>	E4P1 & E4P2



### Clarification required within the Fire Engineering Report

Item	Non-Compliance	DTS Clause	Description
1.	Special Hazards	E1D17 & E2D21	<p>The proposed development contains EV charging stations &amp; Solar Panels. The Fire Engineer is to specify specific requirements within the Fire Engineering Report as agreed through consultation with FRNSW.</p> <p>The projects Fire Engineer needs to ensure that the EVs and Solar Panels are considered within the required assessments as a fire hazard and any results or conclusions take into account the hazards they present.</p>

### Performance Solutions required – BCA Consultant

Item	Non-Compliance	DTS Clause	Description	Performance Requirement
1.	Thresholds	D3D16	<p>The following performance solutions are to be considered and documented where they occur onsite:</p> <ul style="list-style-type: none"> <li>Should steps be proposed within proximity of the door thresholds within the development specifically considering the plant rooms; and</li> <li>Where internal threshold ramps are proposed within door thresholds</li> </ul> <p>The performance solution is required to be provided and justified by an accredited BCA Consultant</p> <p><i>(Note –The project Architect is to document any locations where this issue occurs).</i></p>	D1P2
2.	Height of rooms and other spaces	F5D2	<p>Should any ceiling heights or zones be proposed throughout the development that do not conform with the heights listed to the left then a performance solution will need to be documented to address the non-compliance.</p> <p>The performance solution is required to be provided and justified by an accredited BCA Consultant</p> <p><i>(Note – The projects architect is to document any locations where this issue occurs as this will allow a consolidated performance solution to be provided to address all areas identified within the 1 report).</i></p>	F5P1



## Referenced Drawings

The following documentation issued by Nettletontribe Architects were used in the preparation of this report:

SHEET NO.	SHEET NAME	REV.	DATE
DA000	COVER PAGE	P3	23/05/25
DA001	MASTER PLAN	P4	23/05/25
DA003	SITE ANALYSIS	P3	23/05/25
DA010	GENERAL ARRANGEMENT PLAN - WAREHOUSE	P5	23/05/25
DA011	GENERAL ARRANGEMENT PLAN - MEZZANINE	P5	23/05/25
DA015	GENERAL ARRANGEMENT PLAN - ROOF	P5	23/05/25
DA016	OFFICE LAYOUTS	P3	23/05/25
DA017	DOCK OFFICE LAYOUT	P3	23/05/25
DA021	ELEVATIONS	P4	23/05/25
DA025	OFFICE ELEVATIONS	P3	23/05/25
DA031	BUILDING SECTIONS	P4	23/05/25
DA080	SIGNAGE LOCATION & FENCE PLAN	P3	23/05/25
DA081	SIGNAGE DETAILS	P3	23/05/25
DA090	BUILDING PERSPECTIVES	P2	23/05/25
DA091	BUILDING PERSPECTIVES	P2	23/05/25



## Fire Rating Requirements – Type C Construction

**Table 1 S5C24a: Type C construction: FRL of parts of external walls**

Distance from a fire-source feature	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	<del>Class 2, 3 or 4 part</del>	Class 5, 7a or 9	<del>Class 6</del>	Class 7b or 8
Less than 1.5 m	90/90/90	90/90/90	90/90/90	90/90/90
1.5 to less than 3 m	<del>---</del>	60/60/60	<del>60/60/60</del>	60/60/60
3 m or more	<del>---</del>	<del>---</del>	<del>---</del>	<del>---</del>

**Table 2 S5C24b: Type C construction: FRL of external columns not incorporated into an external wall**

Distance from a fire-source feature	FRL (in minutes): <i>structural adequacy / Integrity / Insulation</i>			
	<del>Class 2, 3 or 4 part</del>	Class 5, 7a or 9	<del>Class 6</del>	Class 7b or 8
Less than 1.5 m	90/ <del>---</del>	90/ <del>---</del>	90/ <del>---</del>	90/ <del>---</del>
1.5 to less than 3 m	<del>---</del>	60/ <del>---</del>	<del>60/<del>---</del></del>	60/ <del>---</del>
3 m or more	<del>---</del>	<del>---</del>	<del>---</del>	<del>---</del>

**Table 3 S5C24c: Type C construction: FRL of common walls and fire walls**

Wall type	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	<del>Class 2, 3 or 4 part</del>	Class 5, 7a or 9	<del>Class 6</del>	Class 7b or 8
Loadbearing or non-loadbearing	90/90/90	90/90/90	90/90/90	90/90/90

**Table 4 S5C24d: Type C construction: FRL of internal walls**

Location	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	<del>Class 2, 3 or 4 part</del>	Class 5, 7a or 9	<del>Class 6</del>	Class 7b or 8
Bounding public corridors, public lobbies and the like	<del>60/60/60</del>	<del>---</del>	<del>---</del>	<del>---</del>
Between or bounding sole-occupancy units	<del>60/60/60</del>	<del>---</del>	<del>---</del>	<del>---</del>
Bounding a stair if required to be rated	<del>60/60/60</del>	60/60/60	<del>60/60/60</del>	60/60/60

**Table 5 S5C24e: Type C construction: FRL of roof**

Location	FRL (in minutes): <i>Structural adequacy / Integrity / Insulation</i>			
	<del>Class 2, 3 or 4 part</del>	Class 5, 7a or 9	<del>Class 6</del>	Class 7b or 8
Roofs	<del>---</del>	<del>---</del>	<del>---</del>	<del>---</del>



## Statutory Fire Safety Measures

### Schedule of Statutory Fire Safety Measures

Measure	Standard of Performance
Automatic Fire Detection And Alarm System (Smoke Detection System)	BCA 2022 S20C4 and AS 1670.1 - 2018
Automatic Fire Detection And Alarm System (Smoke Detection System To Automatically Shutdown Air-Handling System)	BCA 2022 S20C6 and AS 1670.1 - 2018
Automatic Fire Detection And Alarm System (Smoke Detection System To Activate Smoke Exhaust System)	BCA 2022 S20C6 and AS 1670.1 - 2018
Automatic Fire Suppression Systems (Sprinklers)	BCA 2022 Specification 17 and AS 2118.1 - 2017
Building Occupant Warning System	BCA 2022 S20C7 and AS 1670.1 - 2018
Emergency Lighting	BCA 2022 Clause E4D2, E4D4 and AS/NZS 2293.1 - 2018
Exit Signs	BCA 2022 Clause E4D5, NSW E4D6, E4D8 and AS/NZS 2293.1 - 2018
Fire Alarm Monitoring System	BCA 2022 S20C8 and AS 1670.3 - 2018
Fire Control Centre	BCA 2022 Specification 19
Fire Dampers	BCA 2022 Clause C4D15 and AS 1668.1 - 2015 (AS 1682.1 - 2015 and AS 1682.2 - 2015)
Fire Doors	BCA 2022 Specification 12 and AS/NZS 1905.1 - 2015
Fire Hydrants Systems	BCA 2022 Clause E1D2 and AS2419.1-2021
Fire Seals Protecting Opening In Fire Resisting Components Of The Building	BCA 2022 Clause C4D15, Specification 13, AS 1530.4 - 2014, AS 4072.1 - 2005 and installed in accordance with the tested prototype.
Hose Reel System	BCA 2022 Clause E1D3 and AS 2441 - 2005
Lightweight Construction	BCA 2022 Specification 6, Clause A2G3 and AS 1530.4 - 2014
Mechanical Air Handling System (Automatic Shut Down Of Air-Handling System)	BCA 2022 Clause E2D3 and AS 1668.1 - 2015
Mechanical Air Handling System (Automatic Smoke Exhaust System)	BCA 2022 Specification 21
Perimeter Vehicle Access For Emergency Vehicles	BCA 2022 Clause C3D5
Portable Fire Extinguishers	BCA 2022 Clause E1D14 and AS 2444 - 2001
Warning And Operational Signs	BCA 2022 Clauses D4D7, E3D4 and Specification 15

**Note the fire safety schedule will need to be amended subject to the inclusion of a fire engineered performance solution.**



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