



BCA Capability Statement

3 Brookhollow Ave, Norwest

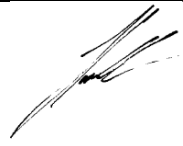
Prepared for: GreenSquare DC

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Contents

1	Executive Summary.....	4
2	Introduction	5
2.1	Purpose.....	5
2.2	Methodology.....	5
2.3	Limitations	5
3	Development Description.....	7
3.1	Proposed Development.....	7
3.2	Location.....	8
3.3	BCA Classification (Part A6)	8
3.4	Rise in Storeys (Clause C2D3)	9
3.5	Effective Heights (Part A1)	9
3.6	Type of Construction Required (Clause C2D2 / Table C2D2).....	9
3.7	Building Data Summary	9
4	Proposed Fire Safety Schedule.....	11
5	Assessment.....	14
5.1	Relevant BCA Edition	14
5.2	Compliance with the BCA.....	14
5.2.1	A2GA Compliance with the Performance Requirements.....	14
5.2.2	Design Details Required	17
6	Conclusion.....	19
7	Appendix A – Design Documentation.....	20

Authorisation

Revision	Comment / Reason for Issue	Issue Date	Prepared by	Reviewed by
01	SSDA Submission - Draft	11 December 2025		
			Angus Peters	Heath McNab

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1 Executive Summary

MBC Group have assessed architectural design documents prepared by Greenbox Architecture (refer appendix A) for compliance with the National Construction Code - Building Code of Australia Volume One 2022 Amendment 2 (referred to as the BCA).

The purpose of the assessment is to provide surety to the Consent Authority, The Hills Shire Council, that the proposed development has been assessed and is capable of complying with the BCA and that subsequent compliance with the provisions of Parts C, D and E of the BCA will not give rise to significant design amendments.

This statement does not consider Section 62 of the Environmental Planning and Assessment Regulation 2021, this clause is a consent authority consideration.

The application for Construction Certificate shall be assessed under the relevant provisions of the Environmental Planning & Assessment Act 1979 (As Amended) and the Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021.

2 Introduction

2.1 Purpose

The purpose of this statement is to assess the current design proposal against the Deemed-to-Satisfy (DtS) provisions of Sections C, D and E of the National Construction Code Series 2022 Amendment 2 (Volume 1) – Building Code of Australia (referred to as BCA), and provide surety to the Consent Authority that the design is capable of compliance without significant design amendments.

The following MBC Group Team Members have contributed to this assessment:

- Angus Peters – Senior Building Surveyor
- Heath McNab – Managing Director

This Capability Statement is not intended to identify all issues of compliance or non-compliance with the BCA with such other issues to be appropriately addressed prior to issue of the Construction Certificate.

2.2 Methodology

The methodology applied in undertaking this assessment has included: -

- A desktop review of architectural plans, as listed in Appendix A
- Assessment of the architectural plans against the following relevant codes:-
- Sections C, D & E (as applicable / relevant) of the National Construction Code Series (Volume 1) Building Code of Australia 2022 Amendment 2 (BCA)
- Environmental Planning and Assessment Act 1979 (EPAA)
- Environmental Planning & Assessment (Development Certification and Fire Safety) Regulation 2021 (EPAR)
- Discussions with the design development team to gain an understanding of the development proposed.

2.3 Limitations

This statement **does not include** or imply any detailed assessment for design, compliance or upgrading for:

- the structural adequacy or design of the building;
- the inherent derived fire-resistance ratings of any proposed structural elements of the building (unless specifically referred to); and
- the design basis and/or operating capabilities (including pressure & flows) of any proposed
 - electrical
 - mechanical
 - hydraulic
 - fire protection services.
- Section 62 of the Environmental Planning and Assessment Regulation 2021

This statement does not include, or imply compliance with:

- the National Construction Code – Plumbing Code of Australia Volume 3
- the Disability Discrimination Act 1992 including the Disability ((Access to Premises – Buildings) Standards 2010 – unless specifically referred to)
- The deemed to satisfy provisions of Part D4 and F4D5 of BCA 2022 Amendment 2
- The deemed to satisfy provisions of Sections B, F, G, H & J of BCA 2022 Amendment 2
- Demolition Standards not referred to by the BCA;
- Work Health and Safety Act 2011;
- An out of cycle change to the Building Code of Australia.
- Requirements of other Regulatory Authorities including, but not limited to, Telstra, Telecommunications Supply Authority, Water Supply Authority, Electricity Supply Authority, Work Cover, Roads and Maritime Services (RMS), Roads and Transport Authority, Local Council, ARTC, Department of Planning and the like; and
- Conditions of Development Consent issued by the Local Consent Authority.

3 Development Description

3.1 Proposed Development

The site is known as 3 Brookhollow Avenue, Norwest (Lot 2021 DP 831173) and is in the Norwest locality, which forms part of the Hills Local Government Area (LGA). Development surrounding the site comprises of a mix of commercial, retail and residential land uses as described below:

- To the north of the site is Norwest Boulevard, commercial office buildings, an early learning centre, 'Castle Pines' retirement community and Castle Hill Country Club Golf Course;
- To the east of the site is Windsor Road, commercial office buildings, small pockets of residential development and industrial development;
- To the south of the site is Brookhollow Avenue, commercial developments, a hotel and medium density residential development; and
- To the west of the site is commercial development, including a shopping centre (Norwest Markettown), various retail offerings and the Norwest Metro Station.

The site is well serviced by public transport including bus and Metro. Norwest Metro Station provides connections to Tallawong in the northwest and Sydney CBD to the southeast. Bus stops along Norwest Boulevard provide connections through to Parramatta, Seven Hills and Rouse Hill. As shown in the below mapping, the site is in proximity to Strangers Creek and Brookhollow Reserve, located at the site's southwestern border. Norwest Lake is located approximately 90m northwest of the site.

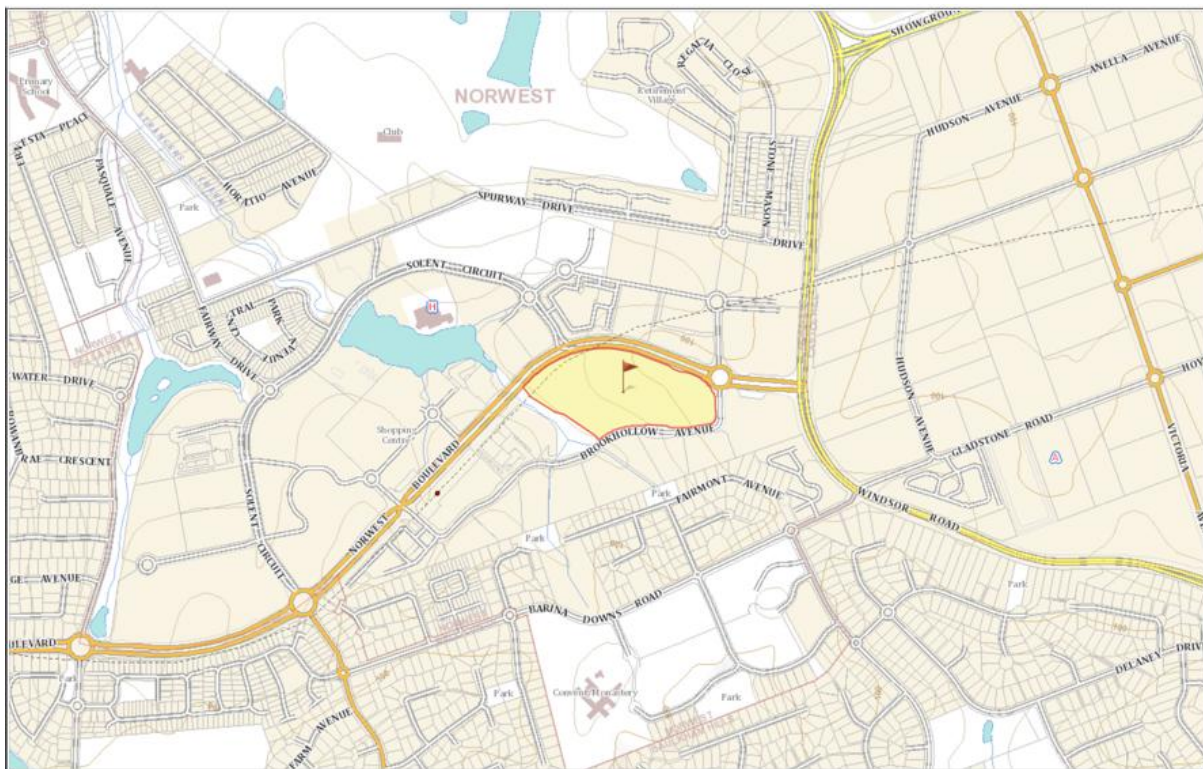


Figure 1. Site Context Map
Source: Six Maps

3.2 Location

The subject site is legally described as Lot 2021 of Deposited Plan (DP) 831173. The site can be described as irregularly shaped and has a total land area of approximately 51,867sqm. A portion of the site currently comprises an existing 4MW data centre that was approved under D93/318, dated 21 June 1993.

The site is bound by Brookhollow Avenue to the south and east, Brookhollow Reserve and the Hills Corporate Centre to the west and Norwest Boulevard to the North. The primary frontage of the site is to Brookhollow Avenue, where vehicular access is provided.

Based on a review of topographical mapping, the site appears to fall from east to west from a maximum height of RL104 in the northeastern corner of the site to RL82m along the western portion of the site.

The site is located approximately 500m to the east of the Norwest Metro station, with the metro line running under the north / northwest boundary of the site.

The site is heavily vegetated, however, none of the vegetation is mapped on the biodiversity values mapping prepared under the *Biodiversity Conservation Act 2016* (BC Act).

Refer to aerials of the site at **Error! Reference source not found.** below.

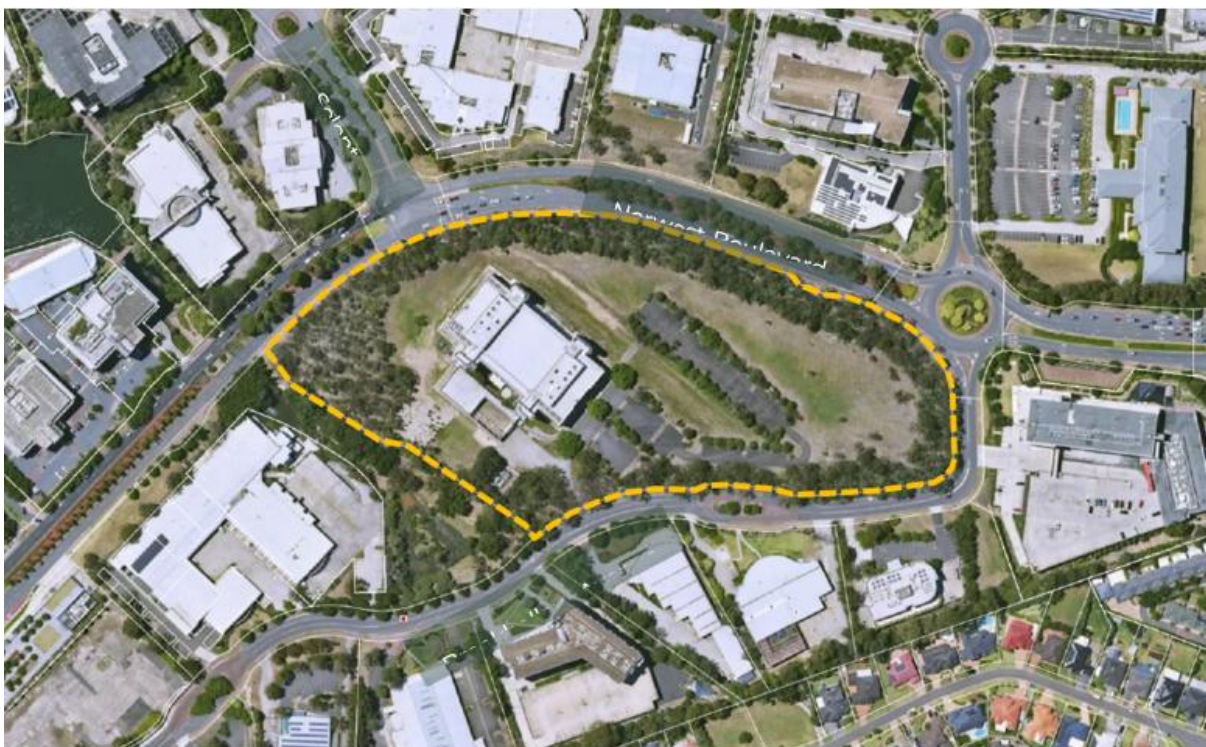


Figure 2. Aerial of the Site

Source: Metro Map, 2024 (modified by Patch)

3.3 BCA Classification (Part A6)

The proposed development shall contain the following classifications: -

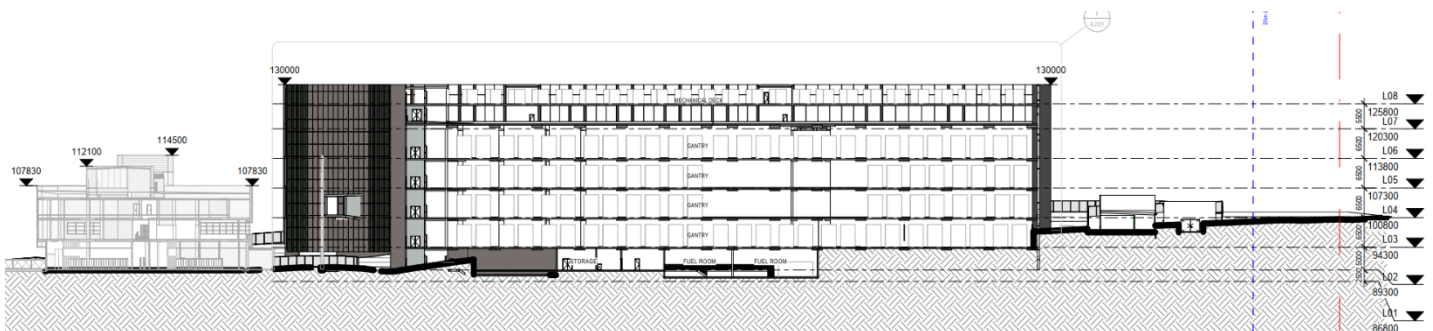
- Class 7b: being a warehouse building or part
- Class 7a: being a carpark building or part

3.4 Rise in Storeys (Clause C2D3)

The proposed development is within a building that has been assessed to have a rise in storeys of 6. This is a result of the topmost storey (L07), including only plant and the mech deck being open to the sky.

3.5 Effective Heights (Part A1)

The proposed development has been assessed to have an effective height of 33.5m (approx.), this is measured from floor level L01 (RL86.8) to floor level L07 (RL120.3).



The BCA now defines effective height as: -

“Effective height means the vertical distance between the floor of the lowest storey included in a determination of rise in storeys and the floor of the topmost storey (excluding the topmost storey if it contains only heating, ventilating, lift or other equipment, water tanks or similar service units).”

3.6 Type of Construction Required (Clause C2D2 / Table C2D2)

The proposed development is required to be Type A Construction. Specification 5 outlines the fire resistance required by certain building elements.

3.7 Building Data Summary

Part of Development	Use	Class	Floor Area (approx.) m ²	Population (using D2D18) *
L01/L02	Data Centre, Carpark	7b, 7a	6,619	165
L03	Data Centre	7b	8,909	297
L04	Data Centre	7b	10,605	354
L05	Data Centre	7b	10,610	354
L06	Data Centre	7b	10,617	354
L07 (roof)	Plant	ancillary	-	-

L08 deck)	(mech	Plant	ancillary	-	-
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Summary of Construction and Building				
Use(s)	Data centre, carpark			
Classifications(s)	7b, 7a			
Number of Storeys contained	6			
Rise in Storeys	6			
Type of Construction	Type A			
Effective Height	33.5m			
Largest Fire Compartment	Area	TBC	Volume	TBC
Climate Zone	6			
Importance Level	Structural Engineer is to determine importance level in accordance with BCA and AS1170 Part 0-2002, this must be specified in their design certificate			

4 Proposed Fire Safety Schedule

The following is a draft Fire Safety Schedule for the proposed building, listing the likely measures and standards of performance required, this schedule shall be subject of further development and review as part of the Performance Solutions assessment:

Fire Safety Schedule

Section 78 of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021

Premises: GreenSquareDC Data Centre Expansion
Address: 3 Brookhollow Avenue, Norwest NSW 2153, Lot 2021 DP 831173

The following essential fire safety measures shall be implemented in the whole of the building premises and each of the fire safety measures must satisfy the standard of performance listed in the schedule which, for the purposes of Section 78 of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021, is deemed to be the current fire safety schedule for the building.

SCHEDULE – Base Building BCA Year 2022 Amendment 2

Type of Construction A

Effective height = 33.5m

	Measure	Status	Existing Performance Standard
1.	Access panels, doors and hoppers to fire-resisting shafts	N	BCA 2022 Amendment 2 Clause C4D14, AS 1905.1-2015, AS1905.2-2005 & Manufacturer's specifications
2.	Self-closing, automatic closing and latching mechanisms	N	BCA 2022 Amendment 2 Clause C4D5, C4D6, C4D9, Spec 12, AS 2118.1-2017, AS 1670.1-2018
3.	Automatic fail-safe devices: Operation of Latch	N	BCA 2022 Amendment 2 Clause D3D26, D3D27, AS 2118.1-2017, AS 1670.1-2018
4.	Automatic fail-safe devices: powered doors	N	BCA 2022 Amendment 2 Clause D3D24, AS 1670.1-2018
5.	Automatic fire detection and alarm system	N	BCA 2022 Amendment 2 Clause E2D3, E2D4, E2D6, E2D21 Spec 20 Clause S20C2, S20C4, S20C6, S20C7 AS 1670.1-2018,
6.	Automatic fire suppression system	N	BCA 2022 Amendment 2 Clause E1D4, Spec 17 AS 2118.1-2017, AS 2118.6-2012 (Combined System)

	Measure	Status	Existing Performance Standard
7.	Emergency lift	N	BCA 2022 Amendment 2 Clause E3D5, AS 1735.1-2016 AS 1735.2-2001, AS1735.11-1986, AS1735.12 1999
8.	Emergency lighting	N	BCA 2022 Amendment 2 Clause E4D2, E4D3 E4D4, AS 2293.1-2018
9.	Exit and directional signage	N	BCA 2022 Amendment 2 Clause E4D5, NSW E4D6 & E4D8, Spec 25 AS 2293.1-2018
10.	Emergency warning and intercommunication systems	N	BCA 2022 Amendment 2 Clause E4D9 AS 1670.4-2018
11.	Fire alarm monitoring system	N	BCA 2022 Amendment 2 Spec 20 Clause S20C8, AS 1670.3-2018
12.	Fire control centres and rooms	N	BCA 2022 Amendment 2 Clause E1D15, Spec 19
13.	Fire & Smoke dampers	N	BCA 2022 Amendment 2 Clause E2D3, C4D13, C4D15, Spec 19 AS/NZS 1668.1-2015, AS 1682.2-2015, Manufacturer's specifications
14.	Fire doors	N	BCA 2022 Amendment 2 Clause C3D13, C3D14, C4D5, C4D9, Spec 12, AS 1905.1-2015
15.	Fire hose reel systems	N	BCA 2022 Amendment 2 Clause E1D3, AS 2441-2005
16.	Fire hydrant systems	N	BCA 2022 Amendment 2 Clause E1D2, AS 2419.1-2021, AS 2118.6-2012 (Combined System)
17.	Fire seals (protecting openings and service penetrations in fire resisting components of the building)	N	BCA 2022 Amendment 2 Clause C4D15, Spec 13, AS 4072.1-2005, AS 1530.4-2014, Manufacturer's specifications
18.	Lightweight construction	N	BCA 2022 Amendment 2 Clause C2D9, Spec 6, AS 1530.4-2014, Manufacturer's specifications
19.	Mechanical air handling systems	N	BCA 2022 Amendment 2 E2 and NSW Part E2, Spec 19, Spec 22, Spec 24 AS/NZS 1668.1-2015, AS 1668.2-2012
20.	Openings in fire-isolated lift shafts	N	BCA 2022 Amendment 2 Clause C3D11 AS 1735.11-1986
21.	Occupant warning system	N	BCA 2022 Amendment 2 Clause E2D3, S17C8, Spec 20 Clause S20C7, AS 1670.1-2018
22.	Path of travel for stairways, passageway and ramps	N	Section 107-109 of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021
23.	Portable fire extinguishers	N	BCA 2022 Amendment 2 Clause E1D14, AS 2444-2001
24.	Pressurising systems	N	BCA 2022 Amendment 2 Clause E2D6, AS 1668.1-2015

	Measure	Status	Existing Performance Standard
25.	Required automatic exit doors	N	BCA 2022 Amendment 2 Clause D3D24, D3D26, NSW D3D26
26.	Add in performance solution requirement e.g. Storage of XXXX materials on storey XXXX must be less than XXXX above finished floor level	N	Performance Solution Report XXXXX, prepared by XXXX dated XXXX

Notes

* Indicate whether the measure is new (N), existing (E) or Modified (M)

5 Assessment

5.1 Relevant BCA Edition

The proposed development will be subject to compliance with the relevant provisions of the Building Code of Australia (BCA) as in force at the time the application for a Construction Certificate is made.

As the Construction Certificate is expected to be lodged after 1 May 2025, the applicable version of the BCA will be NCC 2022, incorporating Amendment 2, in accordance with the transitional provisions set by the Australian Building Codes Board (ABCB).

At the time of this report, the adoption date for NCC 2025 has not been confirmed. Should the CC application occur after the commencement of NCC 2025, this report will require review and potential amendment to address any updated or additional requirements that become applicable at that time.

It is the responsibility of the applicant and design team to monitor the timing of the CC submission and to ensure alignment with the applicable version of the NCC at the time of lodgement.

5.2 Compliance with the BCA

A desktop assessment was carried out against the technical provisions of the BCA and compliance matters will be addressed in the Construction Certificate documentation. It is noted that the proposed development must comply with the relevant requirements, and this can be achieved by complying with the Performance Requirements of the BCA:

5.2.1 A2GA Compliance with the Performance Requirements

1. A Performance Solution
2. A Deemed-to-Satisfy Solution
3. A combination of (1) and (2)

Upon assessment of architectural plans, MBC Group can verify that the proposed design can readily achieve compliance with the performance requirements of the BCA.

Departures from the Deemed to Satisfy Provisions of the BCA are identified below and will need to be addressed during design development:

DTS Clause	Description of Non-Compliance	Performance Requirement
	<u>Type of construction required</u>	
C2D2	A performance solution is proposed to justify rationalisation of required FRL's within the data centre building.	C1P2

DTS Clause	Description of Non-Compliance	Performance Requirement
<u>General floor area and volume limitations</u>		
C3D3	Compartmentation strategy to be confirmed and finalised with the Fire engineer and the design team for rationalisation of oversized floor areas and compartmentation for Type A Construction	C1P1 & C1P2
<u>Exit travel distances</u>		
D2D5, D2D6	L01 (Hyd Plant) Up to 47m to an exit in lieu of 40m Up to 90m between alternative exits in lieu of 60m.	D1P4 E2P2
	L02 Up to 44m to an exit in lieu of 40m. Up to 47m to an exit in lieu of 40m (fuel rooms) Up to 97m between alternative exits in lieu of 60m. Up to 78m between alternative exits in lieu of 60m (fuel rooms).	
	L03 Up to 30m to a POC in lieu of 20m. Up to 64m to an exit in lieu of 40m. Up to 113m between alternative exits in lieu of 60m Up to 111m between alternative exits in lieu of 60m (gantry)	
	L04 Up to 30m to a POC in lieu of 20m. Up to 64m to an exit in lieu of 40m. Up to 113m between alternative exits in lieu of 60m Up to 110m between alternative exits in lieu of 60m (gantry)	
	L05 Up to 30m to a POC in lieu of 20m. Up to 64m to an exit in lieu of 40m. Up to 113m between alternative exits in lieu of 60m Up to 110m between alternative exits in lieu of 60m (gantry)	
	L06 Up to 30m to a POC in lieu of 20m Up to 64m to an exit in lieu of 40m. Up to 113m between alternative exits in lieu of 60m Up to 111m between alternative exits in lieu of 60m (gantry)	
	L07	

DTS Clause	Description of Non-Compliance	Performance Requirement
	Up to 60m to the nearest exit in lieu of 40m Up to 120m between alternative exits in lieu of 60m	
	<u>Travel via fire-isolated exits</u>	
D2D12	Discharge of fire isolated stairway 1 requires passing within 6m of unprotected openings. Fire engineered performance solution is proposed.	D1P4, D1P5
	<u>External stairways or ramps in lieu of fire-isolated exits</u>	
D2D13	A performance solution is proposed to justify external stairways in lieu of fire isolated stairways serving a storey at an effective height >25m.	D1P4, D1P5
	<u>Travel by non-fire-isolated stairways or ramps</u>	
D2D14	A fire engineered performance solution is proposed to address the required non-fire isolated stairway connecting L01 Hyd Plant to L02 BOH area discharges at a point >20m (25m) from a doorway providing egress to a road or open space.	D1P4,D1P5
	<u>Fire hydrants</u>	
E1D2, AS 2419.1- 2021	Insufficient fire hydrant coverage across all levels, necessitates the use of two hose lengths to achieve adequate coverage. AS2419.1-2021 – The standard applies to a building with a total volume not more than 108,000m ³ .	E1P3
	<u>Fire hose reels</u>	
E1D3	To allow for the exclusion of fire hose reels from the entire building excluding loading dock, fuel rooms receiving, staging and waste room areas.	E1P1
	<u>Sprinklers</u>	
E1D4, Spec 20C6 AS2118.1	Proposed omission of sprinklers in various sections of the data centre. Confirmation required from the fire services engineer.	E1P3,E1P4
E1D2, AS 2419.1- 2021, E1D4, Spec 20 AS2118.1	<u>Sprinkler & Hydrant Boosters</u> The sprinkler & hydrant booster are not within sight of the main building entrance.	E1P3, E1P4
E2D4	<u>Fire-isolated exits</u>	D1P4,D1P5

DTS Clause	Description of Non-Compliance	Performance Requirement
	A performance solution is proposed to omit stair pressurisation to Fire Stair 1, giving it serves a storey at an effective height >25m.	
	<u>Zone Pressurisation</u>	
E2D6	A performance solution is proposed to omit zone pressurisation to the proposed data centre building.	D1P4,D1P5
	<u>Weatherproofing</u>	
Part F	A weatherproofing performance solution report is required for the building. This shall be provided by façade engineer	F1P1
	<u>Energy Efficiency</u>	
Part J	A part J consultant shall provide an energy efficiency report for the building.	J1P1

5.2.2 Design Details Required

The assessment of the design documentation has revealed that the following areas require further details to demonstrate compliance with the prescriptive provisions of the BCA as the design develops.

DTS Clause	Description
	<u>Non-combustible building elements</u>
C2D10	An external wall disclosure statement will be required prior to issuing the relevant approval for these works
	<u>Construction joints</u>
C4D16	Any proposed joint construction is to comply with the provisions of C4D16 and in accordance to AS 1530.4 to achieve the required FRL.
	<u>Separation in fire walls</u>
C3D8	Compartmentation strategy to be confirmed and finalised with the Fire engineer and the design team. Specifically focusing on the fire wall separation at the link bridge connecting Stage 1 & Stage 2.
	<u>Protection of openings in external walls</u>
C4D3	Please confirm if any inter-allotment boundaries are situated on the site. These appeared to be present in an earlier revision of plans and not illustrated on the SSDA set.
	<u>Openings in floors and ceilings for services</u>
C4D13	Services consultants to confirm whether any services penetrations are proposed to have rationalised or omitted protection.
	<u>Security zones</u>
D2D5, D2D6	

DTS Clause	Description
	Security zones to be provided to enable further assessment of egress. It is understood some doors to certain zones will not fail open on general fire alarm which may result in egress distance matters.
	<u>Roof space</u> Confirmation of allocated egress paths to be provided for further assessment of egress from this level.
	<u>Latching mechanisms</u>
D3D26	Please confirm if drop bolts are proposed to service the doorways to the collocation halls.
	<u>Fire-resisting construction</u>
Spec 5	Detail FRL wall scheduled to be provided in line with Appendix B at the back on this report.
	<u>Number of persons accommodated</u>
D2D18	The design team are to provide occupancy level for the proposed project.
	<u>Provision for special hazards</u>
E1D17, E2D21	Fire engineer to review and set out the Provision for Special Hazards for the following: • The installation of photovoltaic panels (solar panels) on rooftop • Bulk fuel storage Battery Energy Storage Systems (BESS) using Lithium-Ion batteries (if proposed).

6 Conclusion

This statement outlines the findings of an assessment of the referenced architectural documentation for the proposed development against the Deemed-to-Satisfy provisions of the National Construction Code Series (Volume 1) Building Code of Australia 2022 Amendment 2.

As outlined in section 2.3 of this report excludes the design basis and/or operating capabilities proposed hydraulic and fire protection services. Mains water pressure and flows must be obtained and assessed by hydraulic engineer fire services engineers immediately to ascertain if mains are adequate or onsite water storage is required which can often be substantial in size and require modification of the development consent.

In view of this assessment we can confirm that compliance with the National Construction Code Series (Volume 1) Building Code of Australia 2022 Amendment 2 is readily achievable.

We trust that the above submission is of assistance to Council and should you wish to discuss any aspect of this advice, please do not hesitate to contact the undersigned.

Best regards,

A handwritten signature in black ink, appearing to read "Angus Peters", with a small dot at the end.

Angus Peters
Senior Building Surveyor
MBC Group

7 Appendix A – Design Documentation

The following documentation was used in the assessment and preparation of this statement:

Drawing No.	Title	Date	Drawn By	Revision
A000	COVER SHEET	5/12/2025	SP, BC	1
A010	LOCALITY & CONTEXT PLAN	5/12/2025	SP, BC	1
A011	SITE ANALYSIS	5/12/2025	SP, BC	1
A012	SITE PLAN	5/12/2025	SP, BC	9
A060	SHADOW DIAGRAMS - SUMMER SOLSTICE	5/12/2025	SP, BC	1
A061	SHADOW DIAGRAMS - WINTER SOLSTICE	5/12/2025	SP, BC	1
A062	GFA CALCULATION DIAGRAMS	5/12/2025	SP, BC	2
A065	PHASING DIAGRAM	5/12/2025	BC SP	1
A100	LEVEL 01 - HYD PLANT	5/12/2025	SP, BC	5
A101	LEVEL 02 - BOH FLOOR PLAN	5/12/2025	SP, BC	5
A102	LEVEL 03 - FLOOR PLAN	5/12/2025	SP, BC	4
A103	LEVEL 04 - FLOOR PLAN	5/12/2025	SP, BC	4
A104	LEVEL 05 - FLOOR PLAN	5/12/2025	SP, BC	4
A105	LEVEL 06 - FLOOR PLAN	5/12/2025	SP, BC	4
A106	LEVEL 07 - ROOF PLAN	5/12/2025	SP, BC	4
A107	LEVEL 08 - MECH DECK - ROOF PLAN	5/12/2025	SP, BC	4
A150	NORTH ELEVATION	5/12/2025	SP, BC	3
A151	EAST ELEVATION	5/12/2025	SP, BC	3
A152	WEST ELEVATION	5/12/2025	SP, BC	4
A153	SOUTH ELEVATION	5/12/2025	SP, BC	3
A155	SITE ELEVATIONS (NORWEST BLVD&BROOKHOLLOW AVE)	5/12/2025	SP, BC	1
A200	LONG SECTIONS SHEET 1	5/12/2025	SP, BC	3
A201	LONG SECTIONS SHEET 2	5/12/2025	SP, BC	4
A205	CROSS SECTIONS SHEET 1	5/12/2025	SP, BC	4
A206	CROSS SECTIONS SHEET 2	5/12/2025	SP, BC	4
A210	SITE SECTION SHEET 1	5/12/2025	SP, BC	1
A900	PERSPECTIVES	5/12/2025	SP, BC	1



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