



State Significant Development Application (SSDA) Access Report

Norwest Data Centre Stage 2, 3 Brookhollow Avenue, Baulkham Hills NSW 2153

Prepared for: Green Square DC
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Report Revision

Revision	Comment / Reason for Issue	Issue Date	Prepared by	Reviewed by
01	State Significant Development Application (SSDA) Access Report – DRAFT	03/12/2025	David Choe Senior Access Consultant ACA Associate Member No. 574	Dennisse Bonanno Team Leader ACA Accredited Member No. 504

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1 Executive Summary

MBC Group has been appointed as the access consultancy to assess the State Significant Development Application (SSDA) architectural design documents prepared by Greenbox Architecture Pty Ltd (refer to Appendix A) for compliance with the relevant parts of National Construction Code – Building Code of Australia Volume One 2022 Amendment 2 (BCA) and Disability (Access to Premises- Buildings) Standards 2010 (DAPS), relevant Australian Standards (AS1428) suite, as these relate to access to premises under the intent of 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 BCA and relevant standards are achieved.

1.1 Mandatory Spatial Compliance Capability Matters – Accessibility

The assessment of the design documentation has revealed that the following areas or items are spatial compliance departures from the BCA and DAPS requiring design modifications and/or further information. These are as follows:

DTS Clause	Description of Non-Compliances and/or Requiring Further Information	Performance Requirement/s
D3D22 & D4D4	For each fire-stairs 01 to 06 proposed for The Development, provide an offset tread width at all bases and intermediate landings of all fire-stairs to prevent inner rail with an abrupt change in height such as a diagonal or vertical drop section.	D1P2
F4D5	The development is proposed with two WCs on levels 05 and 06, which are rooms that are sufficiently sized (i.e. circa 2.7m wide by 3.3m long) for use as unisex accessible WCs. Confirm finalised proposed use (e.g. cleaner's WCs or unisex accessible WCs) on the drawings. If confirmed to be unisex accessible WCs, ensure a balance of Left Hand vs Right Hand transfer accessible toilet pans (throughout the building i.e. alternate between LH vs RH).	F4P1

NB: For a comprehensive visual assessment of mandatory spatial compliance capability issues, please refer to Appendix B – Mark Ups.

1.2 Performance Solutions – Accessibility

The assessment of the design documentation has revealed that the following areas or items are technically departures from the BCA, however, can be potential opportunities for performance-based solutions by a third-party access consultancy subject to certifier's concurrence, post-DA.

DTS Clause	Description of Non-Compliances and/or Requiring Further Information	Performance Requirement/s
-	Nil at current stage.	-

NB: For a comprehensive visual assessment of areas requiring potential performance solutions, please refer to Appendix B – Mark Ups.

1.3 Exemption Area(s)/Room(s) Under BCA (D4D5)

The assessment of the documentation has revealed that the following area(s) or room(s) 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 are not required to comply with the prescriptive accessibility provisions of the BCA.

DTS Clause	Description	Performance Requirement
D4D5	<u>Building B – Levels 05 to 06</u> • Airlocks into Data Hall • Mech Corridor • FLEX • SCR • ICT Riser • Riser • Fire Panel Cupboard <u>Building C – Levels 05 to 06</u> • Airlocks into Data Hall • Mech Corridor • FLEX • SCR • ICT Riser • Riser • Fire Panel Cupboard <u>Building D – Levels 05 to 06</u> • Airlocks into Data Hall • Mech Corridor • FLEX • SCR • ICT Riser	D1P1

	• Riser • Fire Panel Cupboard Level 08 – Mechanical Deck	
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This generally applies to plant rooms and other areas used occasionally by maintenance personnel. It should not be used for exempting 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.

2 Introduction

2.1 Purpose

The purpose of this report is to provide a high-level assessment of the spatial compliance capability of the current architectural design documentation at State Significant Development Application (SSDA) stage with respect to the accessibility provisions of that are principally contained within Parts D4, E3 and F4 of NCC BCA 2022 Volume One Amendment 2 (BCA) and Disability (Access to Premises- Buildings) Standards 2010 Compilation No.3 (DAPS) and the relevant 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 spatial compliance capability with BCA and DAPS,
- Areas that are opportunities for potential-performance based solutions under BCA – subject to certifier’s concurrence and via Performance Based Design Brief (PBDB) process with relevant stakeholders.

2.2 Assessment Methodology and BCA

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

- A high-level spatial review of architectural plans, as listed in listed above, in the report revision section.
- A high-level spatial compliance capability assessment against BCA 2022 Volume One Amendment 2 (Parts D4, E3, F4).
- A high-level spatial compliance capability assessments of NCC BCA 2022 Volume One Amendment 2 (BCA) and Disability (Access to Premises- Buildings) Standards 2010 Compilation No.3 (DAPS) (Parts D4, E3, 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 2020 Compilation No. 3 (DAPS), Government of Australia,
<https://www.legislation.gov.au/F2010L00668/latest/text>

Australian Standards series for Access, Mobility Specific and Guidelines:

- AS1428.1:2021 - General Requirements for Access – New Building Work
- AS1735.12:1999 - Lift Facilities for People with Disabilities

Building Code of Australia 2022 Volume One Amendment 2 and more specifically:

- Part D4 - Access for People with Disability
- Part E3 - Lift Installations
- Part F4 – Sanitary Facilities

Disability (Access to Premises) Standards 2010 Compilation No. 3 and more specifically:

- Part D4 - Access for People with Disability
- Part E3 - Lift Installations
- Part F4 – Sanitary Facilities

Reference and Guidelines

- 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>
- Guide to the BCA, Current Version, Australian Building Codes Board, www.abcb.gov.au

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 Principles (x7)

These principles 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 students 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 desks 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 visitors) with hearing loss.

Legislative Provisions for the Upgrade of Existing Buildings

Any new work shall comply with the BCA, that being BCA 2022 Volume One Amendment 2.

The consent authority, when assessing the development application, may require that the existing building be brought into partial or full compliance with the current provisions of the BCA. The triggers for upgrade include:

- *Where the building works, together with any other works completed or authorised within the previous 3 years, represents more than half the total volume of the building; or*
- *The Local Council are not satisfied that the measures contained within the building are adequate for the purposes of life safety or the prevention of the spread of fire to adjacent buildings.*

2.4 Report Limitations and Exclusions

This report is based upon, and limited to, the information depicted in the documentation provided for assessment and does not make any assumptions regarding design intention or the like.

This assessment does not contain comments regarding detailed design issues such as (but not limited to): luminance contrast, slip resistance, handrail design, door schedules and door hardware specifications, hearing augmentation systems, location of fittings within sanitary compartments and lift specifications. This assessment will be done at Construction Certificate stage.

This report does not include, or imply compliance with:

- Work Healthy & Safety Act 2011 and Regulations;
- Work Cover Authority requirements;
- Structural and Services Design Documentation;
- Any parts of the BCA or any standards other than those directly referenced in this report.
- Drawings that are not in the report revision above.
- Detailed set outs and selections of ramps, stairs, lifts, walls, doors, finishes, fittings, equipment and fixtures.
- Crossfalls and floor levels that are not included into the documentations will be excluded from this review.

2.5 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 NCC BCA 2022 Volume One Amendment 2.

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 unfavourable 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.

2.6 Affected Part

Definitions under the Premises Standards

The Premises Standards states:

(3) A building is a **new building if:**

- (a) it is not a part of a building; and
- (b) either:
 - (i) an application for approval for its construction is submitted, on or after 1 May 2011, to the competent authority in the State or Territory where the building is located; or
 - (ii) all of the following apply:
 - (A) it is constructed for or on behalf of the Crown;
 - (B) the construction commences on or after 1 May 2011;
 - (C) no application for approval for the construction is submitted, before 1 May 2011, to the competent authority in the State or Territory where the building is located.

(4) A part of a building is a new part of the building if it is an extension to the building or a modified part of the building about which:

- (a) an application for approval for the building work is submitted, on or after 1 May 2011, to the competent authority in the State or Territory where the building is located; or
- (b) all of the following apply:
 - (i) the building work is carried out for or on behalf of the Crown;
 - (ii) the building work commences on or after 1 May 2011
 - (iii) no application for approval for the building work is submitted, before 1 May 2011, to the competent authority in the State or Territory where the building is located.

(5) **An affected part is:**

- (a) the principal pedestrian entrance of an existing building that contains a new part; and

(b) any part of an existing building, that contains a new part, that is necessary to provide a continuous accessible path of travel from the entrance to the new part.

If a building owner or the only lessee of a building applies for a building or construction approval, the new part and affected part must comply with the Premises Standards.

However, if one, of a number of lessees in a building applies for a building or construction approval, the new part must comply with the Premises Standards. There is no onus on the lessee applying for the approval to upgrade the affected part. Refer to the Premises Standards and the Guidelines on the Application of the Premises Standards for more details.

3 Building Characteristics

3.1 Location and Description

The Development is addressed 3 Brookhollow Avenue, Norwest 2153 and is legally defined as Lot 2021 DP 831173. The Development also known as Norwest Data Centre and is proposed to be located at the corner of Brookhollow Avenue and Norwest Boulevard with both vehicular and pedestrian access linkage available off the same road to the north of the site as shown in Figure 1 below.



Figure 1. Site Location – Courtesy of SIX Maps.

3.2 Use and Building Class – Accessibility

In the context of this report and the BCA the building use can be classified as per the following:

Part of Development	Use	Class	Access Requirements
Ground to Level 8	Data Centre	7b	Access to and within all areas normally used by the occupants.

3.3 Building Data Summary

In the context of this report and the BCA the building data can be summarised as per the following:

Summary of Construction and Building	
Use(s)	Data centre
Classifications(s)	7b
Rise in Storeys	TBC
Type of Construction	TBC

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 Accessibility Compliance (Affected Part)

Premises Standards 2010 - Part 2.1 Clause 5 mandates:

Access for People with Disabilities – Affected Part Upgrade

Commonwealth Disability (Access to Premises- Buildings) Standards 2010 (DAPS)

Clause 2.1 (a) and (b) of the Access to Premises Standard states that the following must comply with the Access Standards:

- Any new building (an application after 1 May 2011)
- Any new part (new works) and
- Any affected part of an (existing) building.

An affected part (as defined in the Premises Standards) is:

- a) The principal pedestrian entrance of an existing building that contains a new part; and
- b) Any part of an existing building that contains a new part, that is necessary to provide a continuous accessible path of travel from the entrance to the new part including ramps and lifts as necessary.
- c) Compliance with the affected part upgrade should be assessed to the satisfaction of the Certifying Authority at CC stage.
- d) Should the applicant for the works be the lessee in a multi-leased building, the affected part upgrade requirements are not applicable to the subject development under concession 4.3 of the Premises Standard.

Assessment Comments
Not applicable as the data centre is a brand-new building.

5 Assessment of Mandatory Requirements for Accessibility

The following assesses the accessibility compliance of the proposed development. The assessment is limited to the spatial compliance capability 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.

Spatial Compliance Capability Matters

5.1 BCA Clause D4D3 / DAPS Clause D3.2 – 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.

Assessment Comments
Current architectural documentation from Greenbox does not include external domain drawings, there is a link bridge connecting the Stage 1 and Stage 2 buildings on level 04 of The Development.
Provide external domain drawings for assessment.
<u>Refer to Appendix B – Mark Ups for further comments.</u>

5.2 BCA Clause D4D3 / DAPS Clause D3.2 – 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 500m², a pedestrian entrance which is not accessible must not be located more than 50m 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 850mm 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 850mm 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.

Assessment Comments
The Principal Pedestrian Entrance (PPE) is currently not shown on the architectural design documentation. Please confirm the location of the PPE on the drawings for assessment.
<u>Refer to Appendix B – Mark Ups for further comments.</u>

5.3 BCA Clauses D4D2 & D4D4 / DAPS Clauses D3.1 & D3.3 – 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 850mm 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.
- The distance between successive doorways in a vestibule serving an area required to be accessible is to be 1450mm (excluding the swing doors).
- 1800mm W x 2000mm L (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.

Assessment Comments
The new data centre building can readily accommodate all the required corridor widths, turning and passing spaces complying with AS1428.1-2021 for areas required to be accessible.
Finer details of compliance can readily be developed during subsequent detailed design development stages.
<u>Refer to Appendix B – Mark Ups for further comments.</u>

5.4 BCA Clause D4D5 / DAPS Clause D3.4 – Exempt Areas

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.

Assessment Comments
Please confirm proposed use of WC rooms on levels 05 and 06.
For a full visual indication of all areas considered inappropriate and unsafe for people with disabilities, please refer to Appendix B – Mark Ups for further comments.

5.5 BCA Clause D4D6 / DAPS Clause D3.5 - Accessible Carparking

For a Class 7 building, accessible car parking spaces need to be provided at a rate of 1x accessible space for every 100 carparking spaces or part thereof.

Accessible car parking spaces shall be made compliant with AS2890.6-2009.

Assessment Comments
Not applicable – no new car parking spaces proposed for The Development.
<u>Refer to Appendix B – Mark Ups for further comments.</u>

5.6 BCA Clauses D3D22 & D4D4 Fire-Isolated Stairway (Common Use)

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

- for a fire-isolated stairway, Clause 11.1(f) and (g) of AS 1428.1 ; and
- Stairs middle landings are to ensure an off-set tread is provided

Assessment Comments
For each fire-stairs 01 to 06 proposed for The Development, provide an offset tread width at all bases and intermediate landings of all fire-stairs to prevent inner rail with an abrupt change in height such as a diagonal or vertical drop section.
<u>Refer to Appendix B – Mark Ups for further comments.</u>

5.7 BCA Clause D4D12 / DAPS Clause D3.11 – Ramps

On an *accessway* -

- A series of connected ramps must not have a combined vertical rise of more than 3.6m; and
- A landing for a step ramp must not overlap a landing for another step ramp or ramp.

Assessment Comments
Not applicable – as there are no new internal ramps proposed within the data centre building.

5.8 BCA Clauses E3D7 and D3D8 / DAPS Clause E3.6 – Passenger Lifts

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 wide by 1400mm long. 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.g. Wheelchairs, prams, large goods, etc.).

Assessment Comments
There is a proposal for two (2x) goods lifts serving the ground floor and up to level 08 of the new data centre building. Both goods lifts are generously sized and have demonstrated spatial compliance capability with AS1735.12-1999.
Finer details can readily be coordinated and detailed to comply with AS1735.12-1999 during subsequent design development stages.
<u>Refer to Appendix B – Mark Ups for further comments.</u>

5.9 BCA Clause F4D5 / DAPS F2.4 – Sanitary and other Facilities

Unisex Accessible Toilets (USAT) and Ambulant Facilities

- 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.
- Left-hand (LH) and right-handed (RH) mirror image facilities to be even where two or more accessible unisex facilities provided. Balance is to be provided between consecutive floor with the same user.
- 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).

Assessment Comments
The development is proposed with two WCs on levels 05 and 06, which are rooms that are sufficiently sized (i.e. circa 2.7m wide by 3.3m long) for use as unisex accessible WCs.
Confirm finalised proposed use (e.g. cleaner's WCs or unisex accessible WCs) on the drawings.

Assessment Comments
If confirmed to be unisex accessible WCs, ensure a balance of Left Hand vs Right Hand transfer accessible toilet pans (throughout the building i.e. alternate between LH vs RH). <u>Refer to Appendix B – Mark Ups for further comments.</u>

Detailed Compliance Matters

5.10 BCA Clauses D4D7 – Signage, D4D8 – Hearing augmentation, D4D9 – Tactile indicators & D4D13 – Glazing on an accessway

Assessment Comments
Finer and detailed accessibility requirements pertaining to signage, hearing augmentation, tactile indicators and glazing on an accessway can readily be coordinated, detailed and addressed to comply during subsequent detailed design development stages/construction documentation or shop drawings stages under additional engagement.

6 Conclusion

This report has reviewed the architectural design documentation submitted for the State Significant Development Application (SSDA) of proposed data center building.

The proposed design has the potential to meet all requirements, provided that the aforementioned spatial compliance capability aspects matters contained within Executive Summary and are duly addressed prior to final State Significant Development Application (SSDA) submission.

It is anticipated that further design refinement will take place throughout the detailed design development phase and before obtaining Construction Certification (CC).

7 Best Practice Recommendations

The following recommendations do not have impact on the building sign off under the BCA and DAPS. The following items are related to AS1428.2:1992, Assessment required by client.

7.1 Luminance Contrast

- Ensure poles, columns stanchions, bollards and fixtures do not protrude into an accessway.
- Ensure any obstacles located in the accessway have a minimum luminance contrast of 30% to its background.
- Ensure furniture contrast against the background.

7.2 Lighting

- Provide minimum illumination in accordance with AS 1428.2 CL.19.1 notes.

7.3 Joinery

- Table, bench and counter dimensions and clearances to comply with AS1428.2 CL. 24.1.

8 Appendix A – Architectural Documentation Reviewed

The following State Significant Development Application (SSDA) design documentation, prepared by Greenbox was used in the assessment and preparation of this report.

Drawing No.	Title	Date	Drawn By	Issue
A104	LEVEL 05 – FLOOR PLAN	28/11/2025	Greenbox	3
A105	LEVEL 06 – FLOOR PLAN	28/11/2025	Greenbox	3
A107	LEVEL 08 – MECH DECK – ROOF PLAN	28/11/2025	Greenbox	3

9 Appendix B – Mark Ups

The following mark ups are to be used for indicative spatial compliance capability design coordination only.

MBC Access Review Mark Ups

MBCGROUP

Date of review: 03.12.2025
Reviewed by: David Choe
Review stage: Schematic Design

LEGEND:

Statutory Requirement Comment BCA/AS

Best Practice Comment (advice)

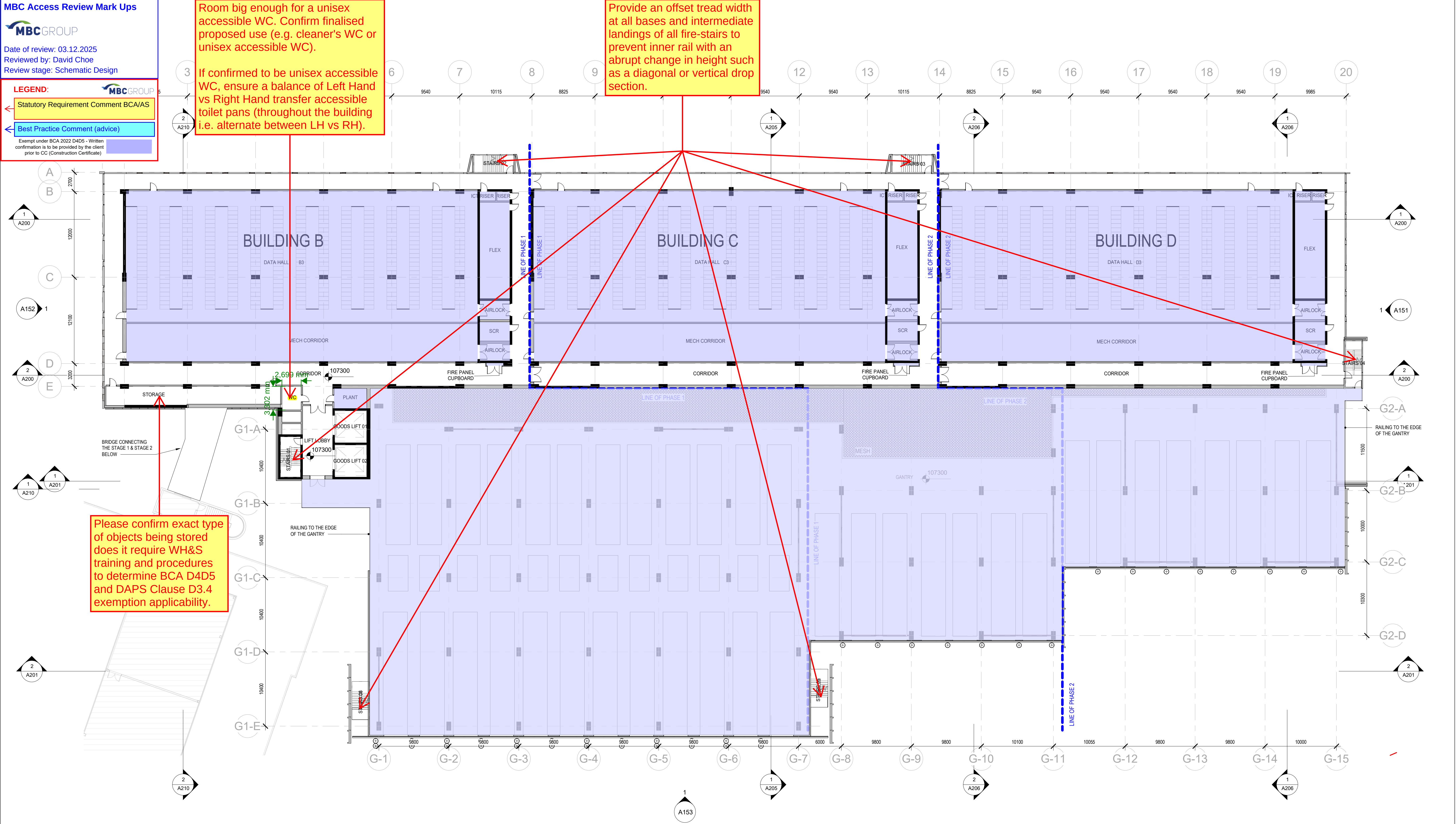
Exempt under BCA 2022 D4D5 - Written confirmation is to be provided by the client prior to CC (Construction Certificate)

Room big enough for a unisex accessible WC. Confirm finalised proposed use (e.g. cleaner's WC or unisex accessible WC).

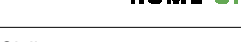
If confirmed to be unisex accessible WC, ensure a balance of Left Hand vs Right Hand transfer accessible toilet pans (throughout the building i.e. alternate between LH vs RH).

Provide an offset tread width at all bases and intermediate landings of all fire-stairs to prevent inner rail with an abrupt change in height such as a diagonal or vertical drop section.

Please confirm exact type of objects being stored does it require WH&S training and procedures to determine BCA D4D5 and DAPS Clause D3.4 exemption applicability.



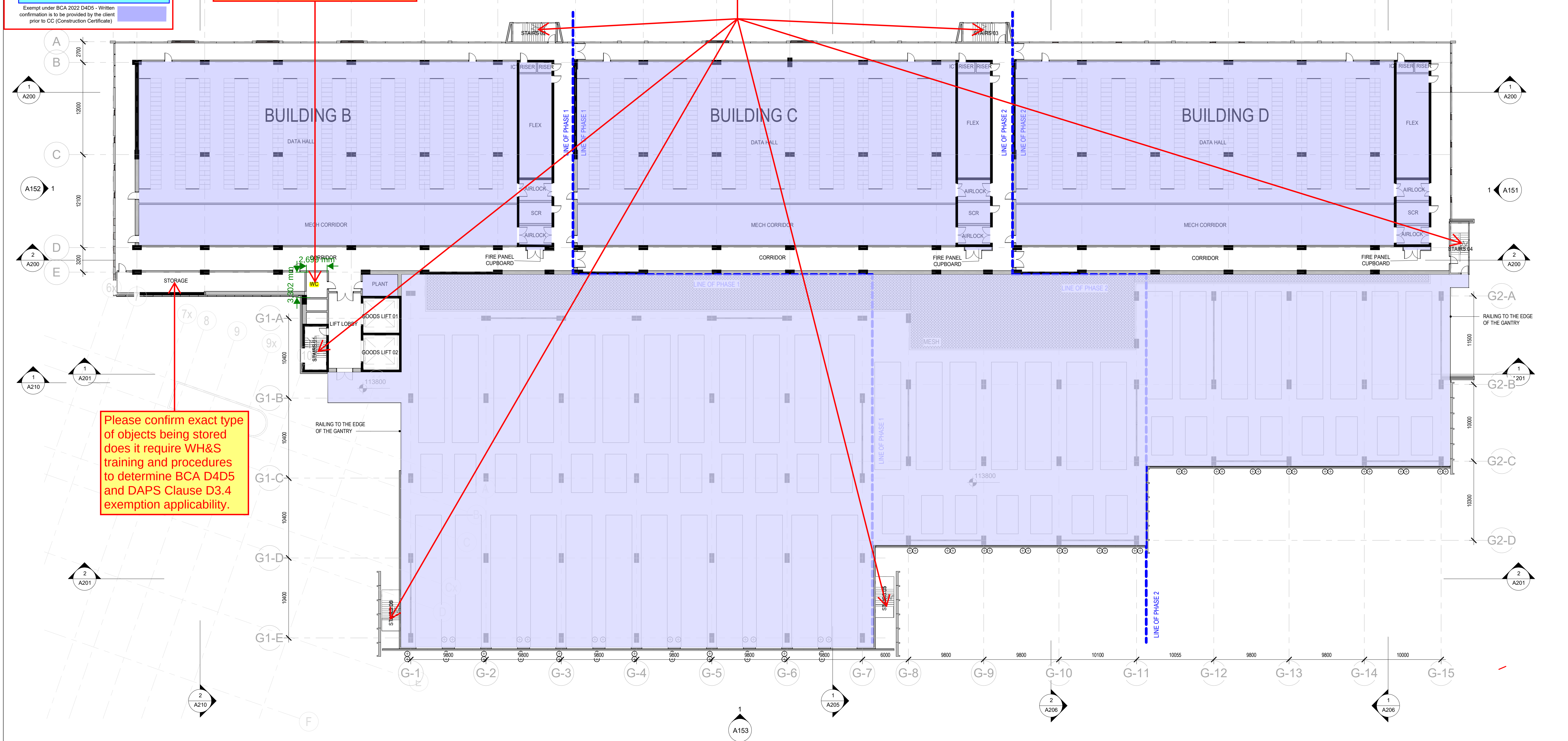
Noted.

N 	Issue		Date	Description	Key Plan	Project Manager  A BGIS Company	Client  HOME OF AI Structural and Civil 	 A WOOLPERT COMPANY +61 2 8069 8930 LEVEL 22 68 PITT STREET SYDNEY NSW 2000 AUSTRALIA GREENBOX ARCHITECTURE PTY LTD ABN: 79 139 779 098 ISO 9001 CERTIFIED QUALITY SYSTEM	Notes		Client GreenSquareDC™ Project Norwest DC 3 Brookhollow Avenue Baulkham Hills NSW	Scale	Sheet	Scale Bar	Project Status	
	1	2	3	ISSUED FOR INFORMATION ISSUED FOR INFORMATION ISSUE FOR INFORMATION					Use written dimensions only Do not scale from drawing Contractors shall confirm all dimensions on-site prior to commencing any work or producing any shop drawings All materials to be used in accordance with the manufacturer's specifications and instructions and shall comply with the relevant Australian Standards Copyright of this drawing and design remain the property of Greenbox Architecture Pty Ltd Nominated Architect - Gerard Page; NSW reg No.7247, Vic reg No.17664, QLD reg No.4538							
	1	2	3	28/11/2025											Drawing By SP, BC	Drawing Title LEVEL 05 - FLOOR PLAN

Room big enough for a unisex accessible WC. Confirm finalised proposed use (e.g. cleaner's WC or unisex accessible WC).

If confirmed to be unisex accessible WC, ensure a balance of Left Hand vs Right Hand transfer accessible toilet pans (throughout the building i.e. alternate between LH vs RH).

Provide an offset tread width at all bases and intermediate landings of all fire-stairs to prevent inner rail with an abrupt change in height such as a diagonal or vertical drop section.



Noted.

