



DA - Building Code of Australia 2022 Amendment 2 and DDA Premises Standards Review (Accessibility Report)

Mamre Road Data Centre Campus
Prepared for: Plan Project Management
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Report Revision

Revision	Comment / Reason for Issue	Issue Date	Prepared by
01	Revision/Issue: - For information.	21 Nov 2025	Dennisse Bonanno
	This Report is Based on Documentation Presented By: Greenbox		
	Issue to: Plan Project Management		
	Drawings assessed are as follows: Refer to Appendix 8		

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1 Executive Summary

We have reviewed the documentation provided for Plan Project Management for Development Application. The documentation reviewed in this report has been prepared by Warren and Mahoney Architects. Proposed development is located at Bronte Road, Bronte NSW. 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 BCA and relevant standards are achieved.

SEARS Compliance		
Section	Request Item	Page Reference
Built Form and Urban Design	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.	Refer to pages 15-21

1.1 Performance Solutions – Accessibility

The assessment of the design documentation has revealed that the following areas or items are departures from the BCA 2022 Amentment 2 and are required to be assessed against the relevant Performance Requirements of BCA 2022 Amentment 2. These are as follows:

DTS Clause	Description of Non-Compliance	Performance Requirement
D4D3	Access to Buildings Pedestrian access is not provided from the main entry, to be addressed as a performance solution	D1P1

1.2 Exemption Area(s)/Room(s) Under BCA (D4.D5)

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 do not comply with the prescriptive provisions of the BCA.

DTS Clause	Description of Non-Compliance	Performance Requirement
D4D5	This will be further developed at the detailed design stage	D3

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

MBC Group have been engaged by Plan Project Management to conduct an Accessibility Assessment Report of the architectural documentation for a development application submission (DA).

2.1 Purpose

The purpose of this report is to assess the current architectural design documentation at Development Application Stage with respect to the accessibility provisions of the Building Code of Australia Volume 1, Edition 2022, Amendment 2, as are principally contained within Parts D4, F2 and E3 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.
- BCA 2022 Amendment 2 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>
- Disability Standards for Accessible Public Transport 2002 (DSAPT 2002)
- Disability Standards for Accessible Public Transport Guidelines 2004 (No 3)

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 Amendment 2.

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

Local Council – Penrith City Council

- 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
- AS2890.1:2004 - Off-Street Car Parking
- AS2890.6:2009 - Off-Street Parking for People with Disabilities
- AS1735.12:1999 - Lift Facilities for People with Disabilities

Building Australian Code - 2022 Amentment 2 specifically

- Part D4 - Access for People with Disability
- Part E3 - Lift Installations
- Part F4 - Sanitary and other 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
- 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>
- Advisory Note on the streetscape, public outdoor areas, fixtures, fittings, and furniture (2013).
- BCA Part I2.

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 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.

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.
- Fittings and fixtures that have not been provided in the documentation provided by the architect or designer will be excluded from this review.
- 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 BCA 2022 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 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.

2.6 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 site is proposed for development under a State Significant Development Application (SSDA) as a data centre campus comprising:

- Approximately 26 shells across four-storeys data centre buildings (4x four shells and 2x five shells), including six technical office buildings, plus a campus office.
- Incoming and internal electrical substations and associated infrastructure
- Site preparation, including earthworks, stormwater, sewer, roads, and associated infrastructure.

The project area for the proposed development, 706-752 Mamre Road, Kemps Creek (Lot 10 DP 1280592), constitutes the main development site with areas across the shared boundaries to the east and south (described below) utilised to facilitate roadworks and bulk earthworks:

- Gibb Group site to the East known as 1-22 Bakers Lane, Kemps Creek (Lot 40 in DP 709347).
- GPT Group site to the South known as 754 Mamre Road, Kemps Creek (Lot 180 in DP 1290397).

Additionally, power supply lead-in from Sydney-West Substation is proposed as part of the development, which traverses through multiple landholdings

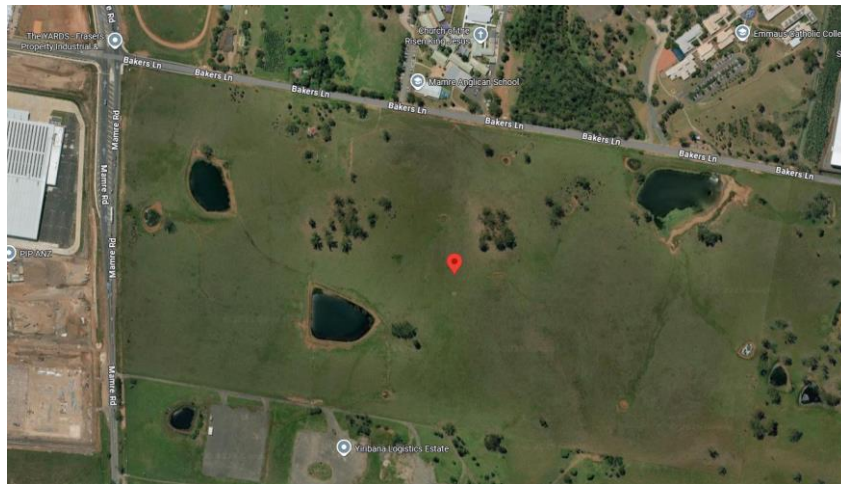


Figure 1. Site Location

3.2 Use and Building Class – Accessibility

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

Parcel A-E

Certification	Descriptions	Access Requirements
Ground Floor	Data Centre	Access is required -to and within all areas normally used by the occupants subject to areas proposed to be exempted.
Level 1	Data Centre	Access is required -to and within all areas normally used by the occupants subject to areas proposed to be exempted.
Level 2	Data Centre	Access is required -to and within all areas normally used by the occupants subject to areas proposed to be exempted.
Level 3	Data Centre	Access is required -to and within all areas normally used by the occupants subject to areas proposed to be exempted.
Level 4	Data Centre	Access is required -to and within all areas normally used by the occupants subject to areas proposed to be exempted.
Level 5	Data Centre	Access is required -to and within all areas normally used by the occupants subject to areas proposed to be exempted.
Level 6	Data Centre	Access is required -to and within all areas normally used by the occupants subject to areas proposed to be exempted.

COSH

Certification	Descriptions	Access Requirements
Ground Floor	Office, Warehouse, Food and Beverage	Access is required -to and within all areas normally used by the occupants.
Level 1	Office, Function Room	Access is required -to and within all areas normally used by the occupants.
Level 2	Office, Sleeping Accommodation	Access is required -to and within all areas normally used by the occupants.
Level 6	Data Centre	Access is required -to and within all areas normally used by the occupants subject to areas proposed to be exempted.

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)

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.

Compliance Comments
Not applicable

5 Mandatory Requirements Accessibility Assessment and 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.

5.1 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
Pedestrian access is not provided from the main entry to each building and accessible carparking.

5.2 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
Each building is capable of complying with an accessible entry

5.3 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 9a)
- 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.
- Turnstiles or revolving doors are to provide alternative doors (hinged or sliding) in accordance with AS1428.1.

Compliance Comments
Provided documentation has been reviewed:
SSDA submission architectural plans prepared by Greenbox, as design develops further assessment to be carried out.

5.4 Stairs, Ramps and Walkways (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 ramp, except a fire-isolated ramp, Clause 10 of AS 1428.1 ; and
- for a stairway, except a fire-isolated stairway, Clause 11 of AS 1428.1 ; and
- for a fire-isolated stairway, Clause 11.1(f) and (g) 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 and ramps 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 and ramps adjacent to doors are to ensure 1450mm front approach level landings.
- All walkways, ramps and stairways are to ensure a minimum 1200mm overall width and 1-metre minimum clear circulation in accordance with AS1428.1.
- Step and kerb ramps are to ensure compliance with AS1428.1.
- Curved ramps and walkways are to ensure 1500mm minimum clear width
- Stairs middle landings are to ensure an off-set tread is provided
- When turning 90-degree or 180-degrees on 1:14 ramp, walkways are to ensure 1450mm x 2070mm landings. When there is a lack of sight a passing bay of 1800mm x 2000mm is required.
- Ramps 1:14 and walkways landings are to be 1200mm (only one direction of travel)
- Ramps 1:14 and walkways landings are to be 1500mm x 1500mm (+splay) when turning 90-degrees
- A series of connected ramps must not have a combined vertical rise of more than 3.6m
- A landing for a step ramp must not overlap a landing for another step ramp or ramp

Compliance Comments
Stairs, ramps and walkways are capable of complying with the above requirements, as design develops further assessment to be carried out

5.5 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.g Wheelchairs, prams, large goods, etc.

Compliance Comments
Lifts have been provided to each building as design develops further assessment to be carried out

5.6 Sanitary and other Facilities F4D5

Unisex Accessible Toilets (USAT) and Ambulant Facilities

- Classes 5,6,9b: 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.
- 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.
- 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
Provided documentation has been reviewed: SSDA submission architectural plans prepared by Greenbox as design develops further assessment to be carried out.

5.7 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
This will be further developed at the detailed design stage

6 Conclusion

This report has reviewed the design documentation submitted for the Development Application (DA) of the Kemps Creek Data Centre

The evaluation was conducted in accordance with the applicable provisions for "Access for People with Disabilities". Based on the proposed documentation provided, it has been identified that the design effectively addresses the necessary accessibility requirements. The design demonstrates a high level of feasibility in achieving these accessibility goals, subject to:

The proposed design has the potential to meet all requirements, provided that the aforementioned aspects are duly addressed. It is anticipated that further refinement will take place throughout the design development phase and before obtaining Construction Certification (CC).

7 Best Practice Recommendations for Architect Reference

The following recommendations do not have impact on the building sign off under the DDA Access Code for Buildings or the BCA/NCC. 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 TGSIs

- Accessways are to feature TGSIs in accordance with AS 1428.4.1 with changes of direction identified in accordance with AS 1428.2 CL.18.1.

7.4 Joinery

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

8 Design Documentation

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

Drawing No.	Title	Date	Drawn By	Revision
SSDA-A-0000	COVER SHEET	7.11.2025	Greenbox	01
SSDA-A-0001	LOCALITY & CONTEXT PLAN	7.11.2025	Greenbox	01
SSDA-A-0005	SITE ANALYSIS	7.11.2025	Greenbox	01
SSDA-A-0010	DEMOLITION PLAN	7.11.2025	Greenbox	01
SSDA-A-0030	OVERALL STAGE AND PHASE DIAGRAM	7.11.2025	Greenbox	01
SSDA-A-0031	PHASE 1 SITE PLAN	7.11.2025	Greenbox	01
SSDA-A-0032	PHASE 2 SITE PLAN	7.11.2025	Greenbox	01
SSDA-A-0033	PHASE 3 SITE PLAN	7.11.2025	Greenbox	01
SSDA-A-0034	PHASE 4 SITE PLAN	7.11.2025	Greenbox	01
SSDA-A-0035	PHASE 5 SITE PLAN	7.11.2025	Greenbox	01
SSDA-A-0036	PHASE 6 SITE PLAN	7.11.2025	Greenbox	01
SSDA-A-0100	CAMPUS PLAN	7.11.2025	Greenbox	01
SSDA-A-0101	OVERALL GROUND FLOOR	7.11.2025	Greenbox	01
SSDA-A-0102	OVERALL LEVEL 1	7.11.2025	Greenbox	01
SSDA-A-0103	OVERALL LEVEL 2	7.11.2025	Greenbox	01
SSDA-A-0104	OVERALL LEVEL 3	7.11.2025	Greenbox	01
SSDA-A-0105	OVERALL LEVEL 4	7.11.2025	Greenbox	01
SSDA-A-0106	OVERALL LEVEL 5	7.11.2025	Greenbox	01
SSDA-A-0107	OVERALL LEVEL 6	7.11.2025	Greenbox	01
SSDA-A-0121	SITE ELEVATIONS	7.11.2025	Greenbox	01
SSDA-A-0122	SITE ELEVATIONS	7.11.2025	Greenbox	01
SSDA-A-0131	SITE SECTIONS - X1/X2	7.11.2025	Greenbox	01
SSDA-A-0132	SITE SECTIONS - Y1/Y2/Y3/Y4/Y5/Y6	7.11.2025	Greenbox	01
SSDA-A-0141	SITE AXONOMETRIC - NW	7.11.2025	Greenbox	01
SSDA-A-0142	SITE AXONOMETRIC - NE	7.11.2025	Greenbox	01
SSDA-A-0143	SITE AXONOMETRIC - SE	7.11.2025	Greenbox	01
SSDA-A-0144	SITE AXONOMETRIC - SW	7.11.2025	Greenbox	01
SSDA-A-0910	SHADOW DIAGRAMS - SUMMER SOLSTICE	7.11.2025	Greenbox	01
SSDA-A-0920	SHADOW DIAGRAMS - WINTER SOLSTICE	7.11.2025	Greenbox	01
SSDA-A-0940	GFA DIAGRAM	7.11.2025	Greenbox	01
SSDA-A-0950	HEIGHT CONTROL PLANE DIAGRAM	7.11.2025	Greenbox	01
SSDA-A-1010	OFFICE WAREHOUSE BUILDING PLANS SHEET 1	7.11.2025	Greenbox	01
SSDA-A-1011	OFFICE WAREHOUSE BUILDING PLANS SHEET 2	7.11.2025	Greenbox	01
SSDA-A-1020	OFFICE WAREHOUSE BUILDING ELEVATIONS	7.11.2025	Greenbox	01

SSDA-A-1030	OFFICE WAREHOUSE BUILDING SECTIONS	7.11.2025	Greenbox	01
SSDA-A-2000	TYPICAL DATA CENTRE BUILDING PLANS	7.11.2025	Greenbox	01
SSDA-A-2001	TYPICAL DATA CENTRE BUILDING PLANS	7.11.2025	Greenbox	01
SSDA-A-2120	PARCEL A - BUILDING ELEVATIONS	7.11.2025	Greenbox	01
SSDA-A-2130	PARCEL A - BUILDING SECTIONS	7.11.2025	Greenbox	01
SSDA-A-2220	PARCEL B - BUILDING ELEVATIONS	7.11.2025	Greenbox	01
SSDA-A-2230	PARCEL B - BUILDING SECTIONS	7.11.2025	Greenbox	01
SSDA-A-2320	PARCEL C - BUILDING ELEVATIONS	7.11.2025	Greenbox	01
SSDA-A-2330	PARCEL C - BUILDING SECTIONS	7.11.2025	Greenbox	01
SSDA-A-2420	PARCEL D - BUILDING ELEVATIONS	7.11.2025	Greenbox	01
SSDA-A-2430	PARCEL D - BUILDING SECTIONS	7.11.2025	Greenbox	01
SSDA-A-2520	PARCEL F - BUILDING ELEVATIONS	7.11.2025	Greenbox	01
SSDA-A-2530	PARCEL F - BUILDING SECTIONS	7.11.2025	Greenbox	01
SSDA-A-2620	PARCEL E - BUILDING ELEVATIONS	7.11.2025	Greenbox	01
SSDA-A-2630	PARCEL E - BUILDING SECTIONS	7.11.2025	Greenbox	01
SSDA-A-3000	TYPICAL SUBSTATION	7.11.2025	Greenbox	01
SSDA-A-4000	ELE SWITCHING STATION + CAMPUS ELE SUBSTATION	7.11.2025	Greenbox	01
SSDA-A-5000	STATCOM	7.11.2025	Greenbox	01
SSDA-A-6000	GUARD HOUSE KIOSKS	7.11.2025	Greenbox	01
SSDA-A-6001	INCOMING SUPPLY PUMP HOUSE	7.11.2025	Greenbox	01
SSDA-A-6002	PUMP ROOM AND WATER CHLORINATOR ROOM (TYPICAL)	7.11.2025	Greenbox	01
SSDA-A-6003	WASTEWATER TREATMENT PLANT ROOM (TYPICAL)	7.11.2025	Greenbox	01
SSDA-A-6004	RAINWATER TREATMENT PLANT ROOM (TYPICAL)	7.11.2025	Greenbox	01
SSDA-A-6005	FIRE WATER PUMP ROOM & FIRE CONTROL CENTRE	7.11.2025	Greenbox	01

