



BCA Capability Statement

Mamre Road Data Centre Campus

Prepared for: Plan Project Management

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Authorisation

Revision	Comment / Reason for Issue	Issue Date	Prepared by	Reviewed by
01	For SSDA Submission	21 November 2025	 Alex Ciecko	 Curtis Schumann

Revision History

Revision	Comment / Reason for Issue	Issue Date	Prepared by
01	For SSDA Submission	21 November 2025	Alex Ciecko

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1 Executive Summary

MBC Group have assessed architectural design documents prepared by Greenbox (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, Penrith City 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:

- Alex Ciecko
- Curtis Schumann

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.

2.4 Conflict of Interest

This statement prepared by MBC Group was provided as part of MBC Group's contracted scope for this project, which is "Certification Work", as defined in the Building and Development Certifiers Regulation 2020.

Due to the strict requirements and limits in terms of conflicts of interest imposed under that regulation, MBC Group has not and cannot undertake any services other than Certification Work services on this project. Hence, the contents of this statement, and any associated correspondence, were provided in the context of a certification assessment, and should not be construed to constitute involvement in building design, the preparation of plans and specifications, the provision of advice on how to amend a plan or specification to ensure that the aspect will comply with legislative or code requirements, or to breach any other restriction or limitation imposed under the conflict of interest provisions of that or any other legislation.

3 Development Description

3.1 Proposed Development

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

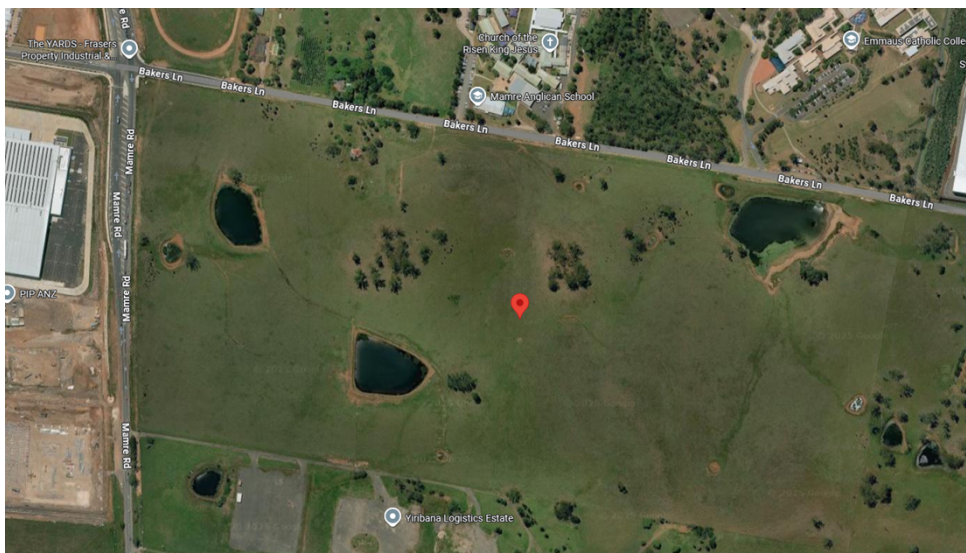
- Approximately 26 shells across four-storeys data centre buildings (4x four shells and 2x five shells), including six technical office buildings, plus a campus office.
- Incoming and internal electrical substations and associated infrastructure
- Site preparation, including earthworks, stormwater, sewer,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

3.2 Location

The project area for the proposed development, 706-752 Mamre Road, Kems 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, Kems Creek (Lot 40 in DP 709347).
- GPT Group site to the South known as 754 Mamre Road, Kems 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



3.3 BCA Classification (Part A6)

The proposed development has been classified as:

- Class 3: being the residential portion of a workers accommodation
- Class 5: being an office building or part
- Class 6: being a retail building or part
- Class 7b: being a warehouse building or part

3.4 Rise in Storeys (Clause C2D3)

The proposed development has been assessed to have a rise in storeys of 10 (due height of each storey exceeding 6m)

3.5 Effective Heights (Part A1)

The proposed development has been assessed to have an effective height of 38m this is measured from floor level 98.0 to floor level 66.5

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

Parcel A-E

Part of Development	Use	Class	Floor Area (approx.) m ²	Population (using D2D18)
Ground Floor	Data Centre	7b, 5	16,266	92
Level 1	Data Centre	7b, 5	16,266	92
Level 2	Data Centre	7b, 5	16,266	92
Level 3	Data Centre	7b, 5	16,266	92
Level 4	Data Centre	7b, 5	7,000	-
Level 5	Data Centre	7b, 5	7,000	-
Level 6	Data Centre	7b, 5	7,000	-

COSH

Part of Development	Use	Class	Floor Area (approx.) m ²	Population (using D2D18)
Ground Floor	Office, Warehouse, Food and Beverage	5, 6, 7b	2,809	86
Level 1	Office, Function Room	5, 9b	1,615	160
Level 2	Office, Sleeping Accommodation	5, 3	1,615	94

Parcel A-E - Summary of Construction and Building				
Use(s)	Storage/Office			
Classifications(s)	5/ 7b			
Number of Storeys contained	5			
Rise in Storeys	10 (due height of each storey exceeding 6m)			
Type of Construction	A			
Effective Height	38m			
Largest Fire Compartment	Area	16,266m ²	Volume	99,222m ³
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			

COSH - Summary of Construction and Building				
Use(s)	Office, Storage, Food and Beverage, Workers accommodation			
Classifications(s)	3, 5, 6, 7b			
Number of Storeys contained	3			
Rise in Storeys	3			
Type of Construction	A			
Effective Height	11.5m			
Largest Fire Compartment	Area	2809m ²	Volume	15,168m ³
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: Mamre Road Data Centre Campus
Address: 706-752 Mamre Road, Kemps Creek, NSW 2178

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 2022 Amendment 2

Type of Construction A

Effective height = 38

	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.	Automatic fail-safe devices: Operation of Latch	N	BCA 2022 Amendment 2, Clause D3D26, D3D27, AS 2118.1-2017, AS 1670.1-2018
3.	Automatic fire detection and alarm system	N	BCA 2022 Amendment 2 Clause E2D2, E2D3, E2D4, E2D6, E2D10, E2D12, E2D21 Spec 20 Clause S20C2, S20C3, S20C4, S20C5, S20C6, S20C7 Spec 31, AS 1670.1-2018, AS 1603 suite
4.	Automatic fire suppression system	N	BCA 2022 Amendment 2 Clause C3D4, E1D4, E1D13, E1D17, Spec 17, Spec AS 2118.1-2017, AS 2118.6-2012 (Combined System)
5.	Emergency lift	N	BCA 2022 Amendment 2 Clause E3D5, AS 1735.1-2016 AS 1735.2-2001, AS1735.11-1986, AS1735.12 1999
6.	Emergency lighting	N	BCA 2022 Amendment 2 Clause E4D2, E4D3 E4D4, AS 2293.1-2018

	Measure	Status	Existing Performance Standard
7.	Exit and directional signage	N	BCA 2022 Amendment 2 Clause E4D5, NSW E4D6 & E4D8, Spec 25 AS 2293.1-2018
8.	Emergency warning and intercommunication systems	N	BCA 2022 Amendment 2 Clause E4D9, G3D8, S31C19, S31C19 AS 1670.4-2018
9.	Fire alarm monitoring system	N	BCA 2022 Amendment 2 NSW S20C8, AS 1670.3-2018
10.	Fire control centres and rooms	N	BCA 2022 Amendment 2 Clause E1D15, Spec 19
11.	Fire & Smoke dampers	N	BCA 2022 Amendment 2 Clause E2D3, C3D6, C4D13, C4D15, Spec 11, Spec 19 AS/NZS 1668.1-2015, AS 1682.1-2015, AS 1682.2-2015, Manufacturer's specifications
12.	Fire doors	N	BCA 2022 Amendment 2 Clause C3D13, C3D14, C4D5, C4D7, C4D9, C4D12, G3D4, S5C45, Spec 12, AS 1905.1-2015
13.	Fire hose reel systems	N	BCA 2022 Amendment 2 Clause E1D3, AS 2441-2005
14.	Fire hydrant systems	N	BCA 2022 Amendment 2 Clause E1D2, AS 2419.1-2021,
15.	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
16.	Lifts • Fire Service Controls • Recall Operation • Drive control switch	N	E3D9 Fire service controls, E3D11 Fire service recall control switch, E3D12 Lift car fire service drive control switch Spec 24 AS1735.11-1986
17.	Lightweight construction	N	BCA 2022 Amendment 2 Clause C2D9, Spec 6, AS 1530.4-2014, Manufacturer's specifications
18.	Mechanical air handling systems	N	BCA 2022 Amendment 2 E2 and NSW Part E2, G3D8 Spec 19, Spec 21, Spec 22, Spec 24, Spec 31 AS/NZS 1668.1-2015, AS 1668.2-2012
19.	Openings in fire-isolated lift shafts	N	BCA 2022 Amendment 2 Clause C3D11 AS 1735.11-1986
20.	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
21.	Perimeter vehicle access for emergency vehicles	N	BCA 2022 Amendment 2 Clause C3D5
22.	Portable fire extinguishers	N	BCA 2022 Amendment 2 Clause E1D14, AS 2444-2001

	Measure	Status	Existing Performance Standard
23.	Pressurising systems	N	BCA 2022 Amendment 2 Clause E2D4, AS 1668.1-2015
24.	Required automatic exit doors	N	BCA 2022 Amendment 2 Clause D3D24, D3D26, NSW D3D26
25.	Smoke detectors and heat detectors	N	BCA 2022 Amendment 2 Clause E2, Spec 20 AS 1670.1-2018, AS3786-2014
26.	Warning and operational signs	N	BCA 2022 Amendment 2 Clause C4D7, D3D28, E3D4, Spec 31, Section 108 of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021
27.	Performance Solution Report	N	

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
C3D3	Fire Compartment Size Due to the size of the gantry, it will result in an oversize fire compartment, details of the gantry are to be provided to enable further assessment	
C3D5	Requirements for open spaces and vehicular access The unobstructed width measures up to 40m in lieu of 18m	
Spec 5	Fire Resisting Construction Due to the web forged flooring on level 5 the flooring it will not have an FRL	
D2D5	Travel Distance to an Exit (Parcel) Point of choice measures up to 27m in lieu of 20m and travel distance to an exit measures up to 63m in lieu of 40m	
D2D5	Travel Distance to an Exit (COSH) Warehouse - Point of choice measures 69m in lieu of 20 travel distance measures up to 75m. This cannot be supported via a fire engineered performance solution, to be resolved through design. Level 0 – Point of Choice measures 25m in lieu of 20m Level 1 – Point of Choice measures 25m in lieu of 20m Level 2 – Point of Choice measures 21m in lieu of 20m Please note as the layouts develop further assessment is required as this may result in increased travel distances	
D2D6	Distance Between Alternative Exits (Parcel) Distance between alternative exits measures up to 105m in lieu of 60m	
E1D2	Fire Hydrant It is anticipated the following items will be subject to a performance solution - Provision of additional internal fire hydrants within each storey (located more than 4m from exit) to achieve coverage - Use of two length of hose to achieve coverage - Booster assembly is not within sight from principal pedestrian entrance and principal vehicle entrance)	
E1D4	Sprinkler System Omission of sprinkler protection is anticipated within the following areas: within generator and power train units (PTU) within low voltage switch rooms	

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,

Alex Ciecko
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
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



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