

Ref: AN022-218897\_Genton\_Echidna\_SSDA\_AccessCapStat\_R2\_220819

17 August 2022

**Genton**

Level G, 71 York Street  
Sydney NSW 2000

**Attention:**           **Dos Shi**  
Project Architect

**Re:**                   **State Significant Development Application**  
**Echidna - Industrial Warehouse**  
**10 Eastern Creek Drive, Eastern Creek NSW 2766**  
**Capability Statement Certification and Accessibility Assessment**

In our role as the Access Assessment Consultant for the project, we have reviewed the plans referenced below that will form part of the State Significant Development Application (SSDA). Philip Chun Accessibility Pty Ltd has provided assessment comments regarding compliance to the design team, hence, we can confirm that we believe the works proposed will be capable of achieving compliance with the Building Code of Australia 2019 Amendment 1 and related Accessibility legislation. The following report identifies issues that may affect the planning and State Significant Development Application (SSDA).

**1.0 Introduction**

This report that been prepared to support the State Significant Development Application (SSD-47320208) for Project Echidna. This report describes the traffic and transport impacts associated with the construction, operation and maintenance of the data centre at Lot 4001 DP 1243178, 10 Eastern Creek Drive, Eastern Creek NSW.

This report has been prepared having regard to the Secretary's Environmental Assessment Requirements issued for the project by DPE, SSD-45765709, issued on 19 July 2022.

**2.0 Proposal overview**

**2.1 Site context**

Arup is seeking development consent to construct a data centre (the Proposal) at Eastern Creek Drive, Eastern Creek NSW, legally described as Lot 4001 DP 1243178 (the Site). The Site is situated within the Blacktown Local Government Area (LGA) on the corner of Eastern Creek Drive and Old Wallgrove Road. The parcel of land is currently vacant, and the site gross floor area (GFA) is of approximately 9,000 square metres. The Site is approximately 40 kms west of the Sydney CBD, 20 kms west of Paramatta and 24 kms southeast of Penrith. Road access to the site is currently via Eastern Creek Drive near Old Wallgrove Road.

The site is subject to the provisions and development controls specified within SEPP 59 – Eastern Creek Precinct Plan (Stage 3) 2005, Blacktown Local Environment Plan (LEP) 2015 and Blacktown Development Control Plan (DCP). It is zoned for general industrial and warehouse land use (IN1) under the SEPP (Industry and Employment) 2021 – formerly the SEPP (Western Sydney Employment Area) 2009 – and is located on the southern boundary of the Blacktown City Council and Fairfield City Council local government areas (LGAs). To the north of the site is bushland and to the west is a riparian buffer, both zoned for environmental conservation (C2). Beyond that, east of the M7 Westlink (SP2 road infrastructure) is the Western Sydney Parkland, including Prospect Nature Reserve, which is also zoned as environmental conservation (C2). Broadly, the site exhibits industrial character with a clustering of manufacturing, IT, freight, and logistics. It is surrounded by similar light industrial neighbouring suburbs in the south, southwest and northeast. By exception

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is the Southridge Plaza to the immediate southeast of the site, which includes Little Graces Childcare Centre and Plus Fitness. The Plaza is owned by York Developments and leased to private operators.

There is low density residential (R2) to the site's north and a mix of primary production small lots (RU4) and rural landscape (RU2) south of the site. Reedy Creek runs south of the site, while Ropes Creek is located to the west. Eastern Creek connects to Reedy Creek about 2.3 km northeast of the site.

There are two key public transport links along Old Wallgrove Road, including bus routes 738 and 835, with a bus stop after Eastern Creek Road in both directions. An additional bus route, 723, stops on Wonderland Drive in both directions and is 1.6 km from the site. there is a shared pedestrian and cycle path alongside the eastern lane of Old Wallgrove Road.

## **2.2 Overview**

The proposed data centre is permissible with consent within a light industrial zone pursuant to the provisions outlines in Section 2.31 of State Environmental Planning Policy (Transport and Infrastructure) 2021.

Given the proposal has a capacity that is greater than 10 MW, the proposal classifies as State Significant Development (SSD) pursuant to the provisions outlined in Schedule 1 of the State Environmental Planning Policy (Planning Systems) 2021.

## **2.3 Description of the proposed development**

The proposed development, construction and operational use of the Data Centre will serve Sydney and the wider region in providing for increasing cloud-based storage and compute requirements. The Data Centre will positively impact the social and economic conditions of Blacktown LGA, creating jobs during both construction and operation.

The design of the Data Centre is based on the end-client's reference design as well as applicable Australian Standards and will deliver capacity for approximately 35.2 MW of IT equipment. Utility power will be delivered via a dedicated on-site electricity substation (subject to a separate development application), with emergency backup power provided by a combination of lithium-ion battery systems and standby generators. Cooling will be delivered by highly efficient fresh air free-cooling systems to ensure energy consumption is minimised as far as practical.

The two (2) level facility will reach a building height of approximately 25 m including all significant plant and rooftop equipment. The facility will include two (2) levels of data hall space and supporting plantrooms, and supporting administrative spaces incorporating secure entry facilities, loading dock, storage, staff offices and the like. The standby generators will occupy an external equipment yard to the west of the main building, and some mechanical equipment will be located at road level. The site will be served from a private on-site substation, located to the west of the proposed data centre building and subject to a separate development application.

Landscaped areas are also proposed, where mature local trees will be used to improve aesthetics and amenity for local businesses. On-site car parking spaces will be provided for staff and visitors, including disabled and electric vehicle parking.

Figure 1 shows the land zoning applicable to the Site and Figure 2 illustrates the Site and surrounding context.

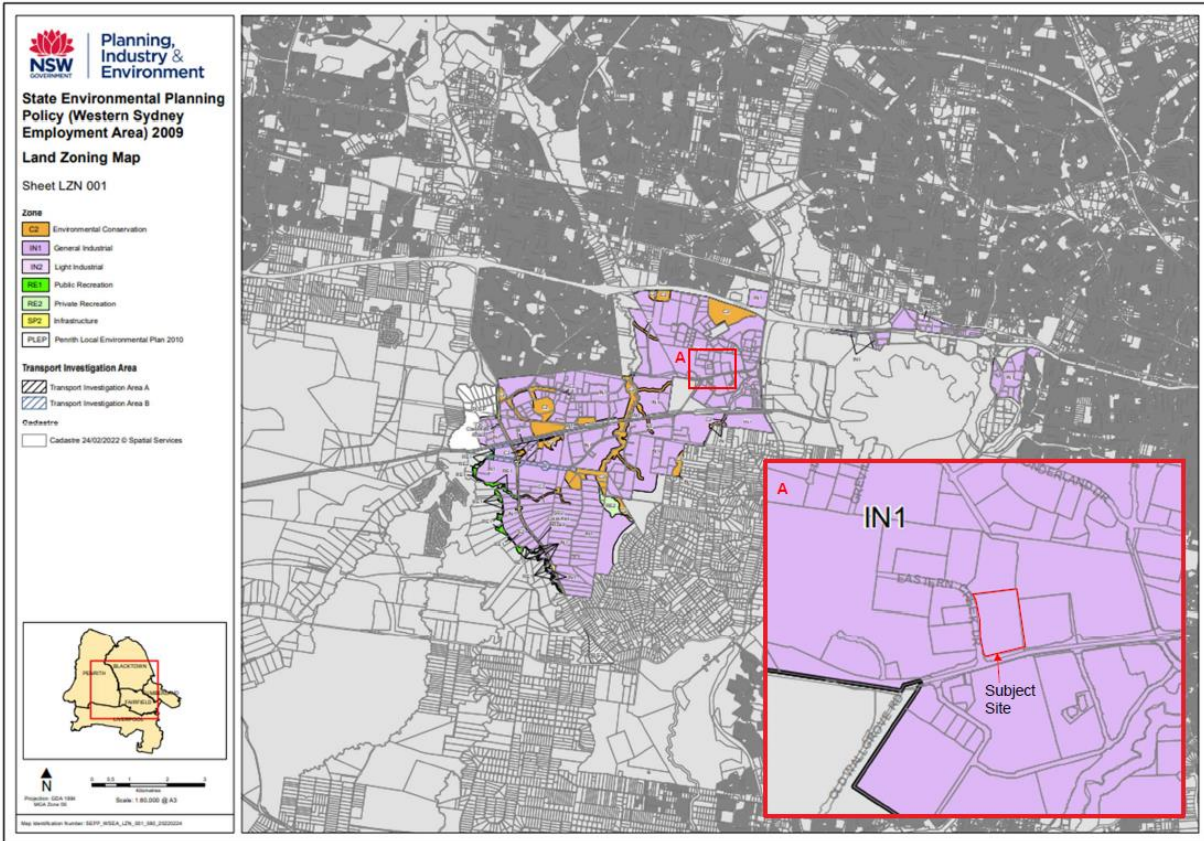


Figure 1 Land Zoning Applicable to the Subject Site under SEPP (Western Sydney Employment Area) 2009



Figure 2 Site Context and Surrounding Area



### 3.0 SEARs and DCP requirements relevant to this report

SEARs and Development Control Plan (DCP) requirements which are relevant to this technical assessment and where they are addressed in this report.

#### SEARs and DCP requirements-built form and urban design principles

SEARs condition	Response
<b>4. Built Form and Urban Design</b> <ul style="list-style-type: none"> <li>• Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach.</li> <li>• Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality.</li> <li>• Demonstrate how the building design will deliver a high-quality development, including consideration of façade design, articulation, roof design, materials, finishes, colours, any signage and integration of services.</li> <li>• Assess how the development complies with the relevant accessibility requirements.</li> </ul>	<p>The Accessibility capability statement outlines how future development will comply with the relevant accessibility requirements.</p> <p>The assessment to date of the early stage of documentation confirms the designs capability to comply.</p>

### 3.1 General Access Assessment Philosophy

This assessment involves a review of the schematic design phase and looks to further inform the design team on high level issues that will affect the design. Philip Chun Accessibility 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.

Access requirements for people with a disability have been assessed against the provisions of the BCA-2019 Amendment 1. Any assessment against Australian Standards such as AS1428.1-2009, where not specifically referenced in the BCA, will be provided as recommendations.

The following is a high-level summary with respect to BCA compliance for the proposed works as it stands at the time of this application, and as appropriate to the State Significant Development Application (SSDA) for the main building elements.

### 3.2 Part D3 - General Building Access Requirements

The National Construction Code (NCC) comprises the Building Code of Australia (BCA) and the Plumbing Code of Australia (PCA). NCC is all encompassing and contains Volumes One, Two and Three; The Guide; and the Consolidated Performance Requirements.

Part D3 of the BCA and Premises Standards prescribes the minimum requirement for access to a building. Access for people with disabilities is required through the principal pedestrian entrance and throughout the building in accordance with Table D3.1. The following table outlines the general building use matrix with corresponding access requirements for this project:

Class of building	Access requirements
<b>Class 5 (Office)</b>	To and within all areas normally used by the occupants
<b>Class 7b (Data Halls / Client Store)</b>	To and within all areas normally used by the occupants
<b>Class 10a (External Plant Rooms / Structures)</b>	No access required

Access requirements considered in this statement are found in a range of legislation, planning instruments and standards pertaining to access for people with a disability, these include but are not limited to:



1. the National Construction Code (BCA 2019 Amendment 1),
2. Disability (Access to Premises–Buildings) Standards 2010 (Premises Standards),
3. relevant referenced Australian Standards,
4. the Disability Discrimination Act 1992 (Cth) (DDA).

In our access reviews to date, we have made every attempt to assess the requirements under BCA 2019 (including NSW variations) and Amendment 1, as they relate to the works proposed under the SSDA / submission and as shown on the plans listed below. We have provided Access compliance reviews to the design team for their incorporation into design and to inform their design options and compliance. This is not verification of full compliance of the design to date but the capability of the design to comply. Areas of the design are still being refined so that compliance will be further assessed at detailed design review stage.

The main issues and principles with respect to compliance of the design relevant to persons with disabilities that have been and are currently further being reviewed include the following:

1. Accessible parking has been provided
2. Provisions for accessible WCs have been provided.
3. Access to all areas that are not exempt from access for persons with disabilities are generally in accordance with the circulation requirements of the Australian Standards

The plans listed below are proposed to be submitted for the SSDA; these plans have issued by Conrad Gargett via Aconex, Mail number C.G.A.-GCOR-000926 and relate to the Accessibility assessment:

Document No	Title	Revision
SYD055-MET-10-XX-DR-A-0011	Mater Site Plan Staging	
SSDA-052	Proposed Site Master plan	
SSDA-100	Ground Floor Plan	
SSDA-101	Level 1 Plan	

#### 4.0 Conclusion

Philip Chun Accessibility Pty Ltd has reviewed the architectural documentation available to date referenced above in our role as access consultants and can confirm the design is capable of complying with BCA as it relates to accessibility. The design is at a point where the inherent BCA and Access philosophies have been checked and development consent can be sought. This is subject to normal design development and further assessment required during the subsequent detailed design stages of the project. The finer details with respect to BCA and access compliance must be finalised prior to the issue of a Construction Certificate.

Yours sincerely,

**Lucy Alderson**  
Access Consultant

**PHILIP CHUN ACCESSIBILITY**