

Our Reference: B203441 – 2 – 23.7.2020

Aspect
Suite 117
25 Solent Circuit
Baulkham Hills
NSW 2153



Attention: Carolyn Stanley

Re: Review of Bushfire Protection Measures to the MPW S3 Construction Compound, Moorebank Intermodal Precinct

Dear Carolyn,

This amended report has been prepared to address the requirements of the NSW Rural Fire Service letter dated 27th May 2020 and to support Stage 3 of the Moorebank Precinct West (MPW) project, which comprises the following components:

1. Establishment of a works compound to facilitate site development works for MPW Concept Plan and Stage 1 Early Works Approval (SSD 5066), MPW Stage 2 Approval (SSD 7709) and future stages of MPW development.
2. Progressive subdivision of the MPW Site into nine allotments for warehousing and distribution facilities, biodiversity conservation, interstate intermodal terminal facilities (IMT) and rail corridor for completion and operation of the import/export (IMEX) freight terminal and rail link.
3. Ancillary works including access roads, earthworks, utilities, stormwater and drainage, signage and landscaping.

Item 16 Bushfire Management of the Secretary's Environmental Assessment Requirements (SEARs) – SSD-10431 requires that an assessment be undertaken against '*Planning for Bushfire Protection 2006*'.

The NSW Rural Fire Service have requested that an assessment of the proposed works be undertaken to identify the extent to which the development conforms with or deviates from the relevant provisions of *Planning for Bushfire Protection 2019*.

ABPP undertook the preparation of a Bushfire Protection Assessment Report for the Concept Plan (SSD 5066) – Reference B152598 – Dated 29.7.2016 which provided recommendations on the provision of bushfire protection measures to satisfy the requirements of *Planning for Bushfire Protection 2006*.

The Conclusion of the Bushfire Protection Assessment Report states:

Item 15 Bushfire Management of the Secretary's Environmental Assessment Requirements (SEARs) requires that an assessment be undertaken against 'Planning for Bushfire Protection 2006'.

This report has examined the Proposal against the requirements of Planning for Bushfire Protection 2006 in relation to the provision of bushfire protection measures to the establishment of an IMT facility and warehousing area and the establishment of a Rail link connection to the Southern Sydney Freight Line (SSFL).

The report has found that the aim and objectives of Planning for Bushfire Protection 2006 have been satisfactorily addressed.

Table 4 below provides a summary of compliance with the specific objectives provided by Planning for Bushfire Protection 2006.

Table 4. Compliance with the specific objectives of *Planning for Bushfire Protection 2006*.

Objective	Compliance with deemed-to-satisfy provisions of <i>Planning for Bushfire Protection 2006</i> .
Afford occupants of any building adequate protection from exposure to a bushfire.	The separation between the fixed assets and the bushfire prone vegetation exceeds the defendable space widths required by <i>Planning for Bushfire Protection 2006</i> and removes the risk of flame contact, high levels of radiant heat and ember attack.
Provide for a defendable space to be located around the building	A defendable space greater than 400 metres is provided to the west of the IMT facility and 25 metres to the west of the warehousing area.
Provide appropriate separation between a hazard and buildings, which, in combination with other measures, prevent direct flame contact and material ignition.	The width of the defendable space provided between the fixed assets and the bushfire prone vegetation removes the possibility of flame contact and high levels of radiant heat impact on the building.
Ensure that safe operational access and egress for emergency service personnel and residents is available.	Safe, alternate egress from the Proposal site is provided onto Moorebank Avenue.
Provide for ongoing management and maintenance of bushfire protection measures, including fuel loads in Asset Protection Zones.	Management of the vegetation within the MPW Site will be undertaken by the operators to maintain minimum dry fuels loads within the Defendable Space and the residual land.
Ensure that utility services are adequate to meet the needs of fire-fighters and others assisting in bushfire fighting.	Utility services meet the needs of bushfire and structural fire-fighting requirements.

No works proposed are to be located outside the scope of the Concept Plan approval and the bushfire impacts associated with the MPW Stage 3 have been previously considered and assessed as part of the SSD 5066 MPW Concept and Stage 1 approval and SSD 7709 MPW Stage 2 approval.

A review of the MPW S3 compound proposal – Drawing No PIWW-RCG-AR-SKC-157 revision C dated 20.12.2019 prepared by Reid Campbell confirms that the location of the Construction, Operation and Maintenance Compound within Lot 10 is protected from the hazard to the south by the existing East Hills Rail Corridor and proposed rail corridor with a combined width of more than 110 metres plus the 280 metre setback from the southern boundary of Lot 10.

This provides a total defensible space width of 390 metres between the Construction, Operation and Maintenance Compound and the bushfire hazard located to the south of the East Hills Rail corridor.

The Construction, Operation and Maintenance Compound is located outside the influence of the bushfire hazard.

The Materials Storage and Parking Area on Lot 10 and the Laydown and Materials Stockpiles on Lots 8 & 9 are also located beyond the bushfire hazard to the south of the East Hills Rail corridor.

In conclusion, the assessment undertaken for the MPW Concept Plan (SSD 5066) found that the aim and objectives of *Planning for Bushfire Protection 2006* had been addressed in the design of the Concept Plan proposal. The MPW Stage 3 proposal does not impact on these findings.

The MPW Stage 3 proposal reduces the physical area of the site occupied from that considered in the Concept Plan (SSD 5066) proposal, therefore increasing the defensible space separation to the bushfire hazard.

The defensible spaces provided to the MPW Stage 3 precinct do not impact on the biodiversity offset areas and the Georges River riparian corridor.

Safe, alternate access from the MPW Stage 3 precinct is provided onto Moorebank Avenue and the vegetation within the defensible spaces and the residual land can be managed to maintain minimum dry fuel loads.

Adequate utility services to meet the needs of bushfire and structural fire-fighting operations can be provided and the proposal is unlikely to present any additional bushfire environmental impacts beyond those already assessed under the previous assessments.

No further bushfire assessment is therefore required.

Planning Secretary's Environmental Assessment Requirements
Section 4.12(8) of the *Environmental Planning and Assessment Act 1979* Schedule 2 of
the *Environmental Planning and Assessment Regulation 2000*

Key Issue 16. Bushfire Management – including but not limited to:	Compliance
16a) An assessment against the <i>Planning for Bushfire 2006</i> (NSW Rural Fire Service)	<p>A Bushfire Protection Assessment Report was prepared by Australian Bushfire Protection Planners Pty Limited for the MPW Concept Plan (SSD 5066) – Reference B152598 – Dated 29.7.2016.</p> <p>The report provided recommendations on the provision of bushfire protection measures to satisfy the requirements of <i>Planning for Bushfire Protection 2006</i>.</p> <p>The MPW Stage 3 proposal does not introduce additional bushfire protection measures that are not consistent with the measures recommended in the MPW Concept Plan (SSD 5066).</p> <p>No further bushfire assessment is therefore required</p>
16b) Demonstrate that the bushfire asset protection zones do not impact on biodiversity offset areas and the Georges River riparian corridor.	<p>The MPW Stage 3 precinct occupies part of the south-eastern corner of the MPW site. This location permits defensible spaces (Asset Protection Zones) to be established that do not impact on biodiversity offset areas and the Georges River riparian corridor.</p>

To address the requirements of the NSW Rural Fire Service's letter dated 27th May 2020 I have examined the development proposal and the previous Bushfire Protection Assessment reports and recommendations against the specifications and requirements of *Planning for Bushfire Protection 2019*.


Table 5 below identifies the extent to which the proposed development complies with or deviates from the relevant provisions of *Planning for Bushfire Protection 2019*.

**Table 5. Compliance with the specific objectives for Buildings of Class 5 – 8
Planning for Bushfire Protection 2019.**

Objective	Compliance with the specific objectives for Buildings of Class 5 – 8 under the provisions of Planning for Bushfire Protection 2019.
Provide suitable access to/from the public road system for fire-fighters providing property protection during a bushfire and for occupant egress for evacuation.	Direct access and egress for fire-fighters and for occupants is provided onto Moorebank Road. This public road will not be directly impacted by bushfire.
Provide suitable emergency and evacuation arrangements for occupants of the development.	A BEEP will be prepared for the work-site.
Provide adequate services of water for the protection of buildings during and after the passage of fire and locate gas and electricity so as not to contribute to the risk of fire to a building.	A reticulated hydrant supply for fire-fighting operations exists in Moorebank Road. This service extends into the development site.
Provide for the storage of hazardous materials away from the hazard, wherever possible.	The materials store area is located away from the hazard on the land to the south of the development site.

If you require any further information please contact the undersigned.

Yours faithfully,



Graham Swain, Managing Director,
Australian Bushfire Protection Planners Pty Limited.