

Job No. 2021/1332

Wednesday, October 30, 2024

Attention: Matthew Murphy

RP Infrastructure
Level 9/20 Bond Street
Sydney NSW 2000

Dear Matt,

RE: Response to Submission – Westgate Industrial Estate (Item 15 - Fire Fighting Perimeter Access Roads (SSD-23480429))

Steve Watson and Partners upon request by RP Infrastructure has prepared this document to assist in a response back to the Department of Plannings concern of the currently designed perimeter vehicle path for Fire & Rescue NSW.

Whilst it is acknowledged that the current details documented on the drawings do not achieve or pertain to full deemed to satisfy compliance with the BCA and the associated Fire & Rescue guidelines for access for fire brigade vehicles and firefighters, there are mechanisms which are readily available to overcome this by presenting departures via a performance solution, which is the proposal for this site as specified within my initial report to accompany the application for the SSDA (refer to attachment A of this document overleaf).

These departures via a performance solution will be subject to an FEBQ and FER submission through FRNSW under the provisions of Section 26 of Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021. The departures will be assessed against the performance requirements of the BCA, and ensuring operational requirements and obligations against the FRNSW guidelines are still met. It should be noted that similar performance solutions on many other industrial / warehouse projects have been presented to FRNSW where they have been accepted.

In considering the proposed project design it can be confirmed that whilst there are isolated pinch points associated with warehouse 1A and 2, these are due to installations such as gates and other similar minor obstructions that are commonly seen on projects which contain a width of less than 6m. Per the below extract from section 7.1.2 of the FRNSW Fire Safety guidelines for Access for fire brigade vehicles and firefighters it can be seen that a FRNSW appliance (whether a general or specialist appliance) contains a width of 3m which demonstrates the pinch points in isolation are of no concern. It is further explained in the note of section 7.1.2 of the guideline that where the 6m width is not achieved a designated aerial appliance hardstand can be considered in the design. It is noted that other than the minor deviations and encroachments the vast majority of the perimeter vehicle paths contain the required width suitable for a specialist appliance to be dispatched and operate using the in-built stabilisers for search and rescue and fire sighting activities.

General fire appliance		Specialist fire appliance	
Gross vehicle mass	15 000 kg	Gross vehicle mass	29 300 kg
Overall length	10.0 m	Overall length	12.5 m
Overall width (incl. mirrors)	3.0 m	Overall width (incl. mirrors)	3.0 m
Body width (excl. mirrors)	2.5 m	Body width (excl. mirrors)	2.5 m
Overall height	3.7 m	Overall height	4.3 m

Table 1 Overall parameters of fire appliances

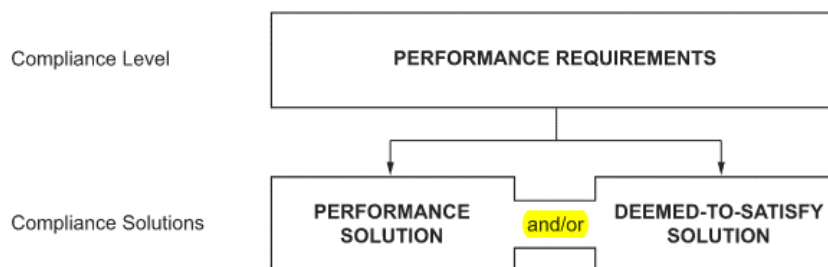


In regard to warehouse 1B & 1C it is noted that whilst there is no direct 6m path hard up against the building, it should be noted that the BCA Clause C3D5 permits the path to be within 18m of the external wall. This means the BCA acknowledges that it is not always possible to have a direct perimeter path and relies on adjacent roads and other such hard surfaces to facilitate a path for FRNSW appliances to traverse.

According to the guide applicable to the BCA the intent of having this perimeter vehicle path is not just for fighting fires, the intent is to also stop spread of hazards and fire to adjoining allotments and structures due to vast amount of storage a facility of this nature can hold.

Whilst it is acknowledged that some of the perimeter vehicle paths sit outside of the 18m DTS rule of the above-mentioned clause there is a vast precedence set of similar circumstances being addressed by means of a performance solution with acceptance achieved through FRNSW. It is noted in the proposed design we are still achieving a full perimeter vehicle path with some deviations as I have discussed. We provide fire fighter and pedestrian access to all buildings and their elevations as well as in some circumstances a greater distance away from allotment boundaries facilitating a greater separation to further minimise the risk of spread of fire to adjoining properties and allotments.

It can be seen that whilst the design does not achieve DTS compliance with both the BCA or the Guidelines provided by FRNSW it needs to be acknowledged that both documents provide the opportunity for a performance-based determination route to be undertaken just like any other project being designed, constructed, developed or submitted for State Significant Consent. Based on this the design presented is compliant with the BCA given we will meet the requirements stipulated under the performance requirements.



If you have any queries please do not hesitate to contact me.

Kind regards,

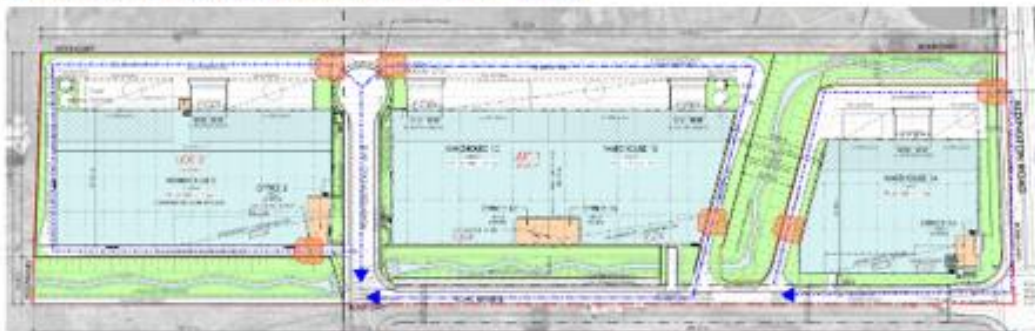
Joshua Hawke
Senior Building Regulations Consultant
Steve Watson and Partners Pty Ltd



Attachment A

Item	Non-Compliance	DTS Clause	Description	Performance Requirement
3.	Requirements for open spaces and vehicular access	C3D5	<p>The following departures associated with the perimeter vehicle access are to be addressed:</p> <ul style="list-style-type: none"> The vehicular perimeter access road is situated greater than 18m to the following areas: <ul style="list-style-type: none"> Up to 21m to the North of each warehouse in isolated instances] Up to 19m to the East of Warehouse 1A (Aldington Road); Up to 32m to the South of Warehouse 1b & 1 C; Contains portions of the perimeter access road of a clear width of less than 6m as per the following: <ul style="list-style-type: none"> Reduced to 4.9m along the south and western elevations of warehouse 2 for the length of the elevation in parts due to obstructions. Reduced to 5.6m due to the gates located on the North-Eastern corner of Warehouse 1A. Security gates are also proposed to cross the vehicular access path where the vehicular access road connects to the public road. 	C1P9

Obstructions within the perimeter vehicle path – Gates



6m perimeter path deviations – Path Exceeds 18m



Perimeter Vehicle Path where 6m width is not achieved

