



File Ref. No: FRN25/1556 BFS26/4280 7000002545
TRIM Doc. No: D26/90027
Contact: Station Officer Michael Millar

17 June 2026

PATRICK COPAS
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Patrick

Re: Advice on Environmental Impact Statement (EIS) – KOGARAH GOLF CLUB REDEVELOPMENT – 13-19A MARSH STREET, ARNCLIFFE (SSD-84467726).

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on the 3 July 2024, requesting advice on the EIS for KOGARAH GOLF CLUB REDEVELOPMENT – 13-19A MARSH STREET, ARNCLIFFE (SSD-84467726). FRNSW have reviewed the EIS with particular focus to Section 6.9, along with the Appendix Y - Preliminary Hazards Analysis (PHA) and Appendix Z - Fire Safety Concept Strategy.

FRNSW note the proposal includes a large scale / multi-level warehousing and a data centre. It is the experience of FRNSW that developments of this type pose special problems of firefighting. To ensure first responders have the ability to render safe an incident, should this project be approved, FRNSW make the following recommendations:

1. Prior to construction a Fire Safety Study (FSS) is developed in accordance with the requirements of the Hazardous Industry Planning Advisory Paper (HIPAP) No.2¹ and submitted to FRNSW for review.
 - The FSS is to be used to guide the design and as such it is FRNSW Position² that the FSS be developed to the satisfaction of FRNSW prior to any further submission being made to FRNSW; this includes: an Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).
 - The FSS should be prepared consistent with the relevant FRNSW Fire Safety Guidelines, FRNSW Technical Information Sheets³ and the Lithium-ion batteries and diesel generators in data centres⁴ position statement.
2. Compliance is demonstrated with FRNSW fire safety guideline - Access for fire brigade vehicles and firefighters. Perimeter Vehicle Access must be provided at ground level and of an obvious and appropriate hardstand material.⁵

3. It is the experience of FRNSW that the water demand for fire infrastructure servicing a development of this scope is unlikely to be supplied by mains water alone. FRNSW recommend that suitable design considerations are considered for the placement of tanks and other firefighting infrastructure if required.
4. That thorough analysis of the Fire Brigade Intervention Model is conducted to ensure that appropriate water supply is provided for hydrant and sprinkler systems.
5. Implement the applicable provisions of AS2419 Appendix C (informative).
6. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1.⁶
7. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) be prepared in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans.⁷

For further information please contact the Fire Safety Liaison Unit, referencing FRNSW file number BFS26/4280. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely,



Inspector Chris Naisby
Team Leader
Fire Safety Liaison Unit

Cc: patrick.copas@dphi.nsw.gov.au

¹ <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-and-offensive-planning-advisory-paper-no-2-fire-safety-study-guidelines.pdf>

² <https://www.fire.nsw.gov.au/page.php?id=9447&position=51>

³ <https://www.fire.nsw.gov.au/page.php?id=9166>

⁴ https://www.fire.nsw.gov.au/_data/assets/pdf_file/0022/17590/Position-statement-summary-Lithium-ion-batteries-and-diesel-generators-in-data-centres.pdf

⁵ https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_access_for_emergency_vehicles.pdf

⁶ <https://www.planning.nsw.gov.au/sites/default/files/2023-03/hazardous-industry-planning-advisory-paper-no-1-emergency-planning.pdf>

⁷ [Emergency services information package and tactical fire plans](#)