



RFS



Department of Planning, Housing and Infrastructure (Major Projects)

Locked Bag 5022
Parramatta NSW 2124

Your reference: SSD-73761707

Our reference: DA20250522002009-EIS & DA
Exhibition-1

ATTENTION: Shaun Williams

Date: Monday 23 June 2025

Dear Sir/Madam,

State Significant Development - Industry

Request for comments - exhibited Environmental Impact Statement (EIS)

Glendenning Road Data Centre - 2 Glendenning Road Glendenning 2761, 2//DP1137162

Reference is made to correspondence dated 14/05/2025 seeking comments regarding the Environmental Impact Statement (EIS) currently being exhibited, for the above State Significant Development in accordance with the *Environmental Planning and Assessment Act 1979*.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the EIS and provides the following comments;

Asset Protection Zones

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.

1. From the commencement of building works and in perpetuity, the entire property (except for the 'Biodiversity Zone' and 'Terrestrial Biodiversity' areas as shown on the site plan) must be managed to the standards of an inner protection area (IPA) as outlined in Appendix 4 of *Planning for Bush Fire Protection 2019*:

- Tree canopy cover should be less than 15% at maturity;
- Trees at maturity should not touch or overhang the building;
- Lower limbs should be removed up to a height of 2 m above the ground;
- Tree canopies should be separated by 2 to 5 m;
- Preference should be given to smooth-barked and evergreen trees;
- Large discontinuities or gaps in the shrubs layer should be provided to slow down or break the progress of fire towards buildings;
- Shrubs should not be located under trees;
- Shrubs should not form more than 10% ground cover;
- Clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation;
- Grass should be kept mown (as a guide, grass should be kept to no more than 100mm in height); and
- Leaves and vegetation debris should be removed regularly.

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2. Landscaping within the inner protection area (IPA) must comply with Appendix 4 of *Planning for Bush Fire Protection 2019*. In this regard, the following principles are to be incorporated:

- A minimum 1 metre wide area (or to the property boundary where the setbacks are less than 1 metre), suitable for pedestrian traffic, must be provided around the immediate curtilage of the building;
- Planting is limited in the immediate vicinity of the building;
- Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters);
- Landscape species are chosen to ensure tree canopy cover is less than 15% (IPA) at maturity and trees do not touch or overhang buildings;
- Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies;
- Use smooth bark species of trees species which generally do not spread fire up the bark into the crown;
- Avoid planting of deciduous species that may increase fuel at surface/ ground level (i.e. leaf litter);
- Avoid climbing species to walls and pergolas;
- Locate combustible materials such as woodchips/mulch, flammable fuel stores away from the building;
- Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from the building; and
- Low flammability vegetation species are used.

Construction Standards

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.

3. The proposed buildings must incorporate ember protection measures. This can be achieved by enclosing all openings (excluding roof tile spaces) or covering openings with a non-corrosive metal screen mesh with a maximum aperture of 2mm. Where applicable, this includes any sub floor areas, openable windows, vents, weepholes and eaves. External doors are to be fitted with draft excluders.

4. Hazardous materials must be stored on the shielded side of buildings and away from bush fire hazards.

5. Any new fences and gates must comply with section 7.6 of *Planning for Bush Fire Protection 2019*.

6. Any new retaining walls must be constructed entirely from non-combustible materials.

Access - Property Access

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.

7. Sufficient defendable space for vehicular movements must be provided around each building in accordance with section 3.2.4 of *Planning for Bush Fire Protection 2019*. In this regard, vehicular access around each building must comply with the following requirements of Table 7.4a of *Planning for Bush Fire Protection 2019*:

- access roads are two-wheel drive, all-weather roads;
- the capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes), bridges and causeways are to clearly indicate load rating;
- there is suitable access for a Category 1 fire appliance to within 4m of the water supply;
- a minimum 4m carriageway width;
- have passing bays every 200m that are 20m long by 2m wide, making a minimum trafficable width of 6m, at the passing bay;
- a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches;



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- curves have a minimum inner radius of 6m and are minimal in number to allow for rapid access and egress;
- the minimum distance between inner and outer curves is 6m;
- the cross fall is not more than 10 degrees; and
- maximum grades for sealed roads do not exceed 15 degrees and not more than 10 degrees for unsealed roads.

Emergency and Evacuation Planning

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.

8. A Bush Fire Emergency Management and Evacuation Plan must be prepared consistently with NSW RFS document: *A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan*.

For any queries regarding this correspondence, please contact Simon Derevnin on 1300 NSW RFS.

Yours sincerely,

Adam Small
Supervisor Planning & Environment Services
Built & Natural Environment