



File Ref. No: FRN12/2138 BFS25/3615 8000042961
TRIM Doc. No: D25/65572
Contact: Station Officer Richard Jay

17 June 2025

SALLY MUNK
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Sally,

Re: Advice on Amendment Report - RUSHES CREEK POULTRY FARM (SSD-7704-MOD-6)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 3 June 2025, requesting advice on the Amendment Report for RUSHES CREEK POULTRY FARM (SSD-7704-MOD-6). FRNSW have reviewed the Modification Report with particular focus to Appendices A (Updated Project Description) and N (Preliminary Hazards Analysis).

It is noted that the Preliminary Hazards Analysis (PHA) identifies LPG as exceeding the screening threshold at each of the three installations and that the identified resultant Indicative Societal Risk is 'tolerable in the ALARP region' (page 31). Whilst stated as such, this conclusion does not appear to be identified in Figure 12 of the PHA. In addition, the Fire Safety Study (FSS is not specifically reviewed currently) notes Polyisocyanurate wall panels as an identified hazard.

It has been the experience of FRNSW that LPG and Polyisocyanurate panels present special problems of fighting fire and suitable additional provisions are likely to be required in accordance with E1D17 and E2D21 of the National Construction Code 2022. FRNSW therefore recommend the following conditions:

1. Prior to construction the updated Fire Safety Study (FSS) is submitted to FRNSW for review.
 - The FSS is to be used to guide the design and as such it is FRNSW Positionⁱ 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 and FRNSW Technical Information Sheetsⁱⁱ.
2. Prior to occupation or commissioning an Emergency Plan (EP) is developed for the site in accordance with HIPAP No.1ⁱⁱⁱ.

3. Prior to occupation or commissioning an Emergency Services Information Package (ESIP) is developed for the site in accordance with FRNSW fire safety guideline – Emergency services information package and tactical fire plans^{iv}.

For further information please contact the Fire Safety Liaison Unit, referencing FRNSW file number BFS25/3615. Please ensure that all correspondence in relation to this matter is submitted electronically to FireSafety@fire.nsw.gov.au.

Yours sincerely,



A/Superintendent Luke Loseby
Manager
Fire Safety Liaison Unit

Cc: sally.munk@planning.nsw.gov.au

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

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

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

^{iv} <https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/03%20Emergency%20services%20information%20package%20and%20tactical%20fire%20plans.pdf>