

**BUSHFIRE PROTECTION ASSESSMENT
FOR MOD 2 TO THE DCI DATA CENTRE
ON**

**LOTS 32 & 33 in DP 1140168,
LOT 34 in DP 1131779 &
LOT 25 in DP 1122038**

**No. 90 & 102 PETER BROCK DRIVE
and
No. 5 RACEWAY PLACE,**



ABPP

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EASTERN CREEK

Report Number	Document	Preparation Date	Issue Date	Directors Approval
B254340 - 3	Final	28.08.2025	29.10.2025	<i>G.L. Swain</i>

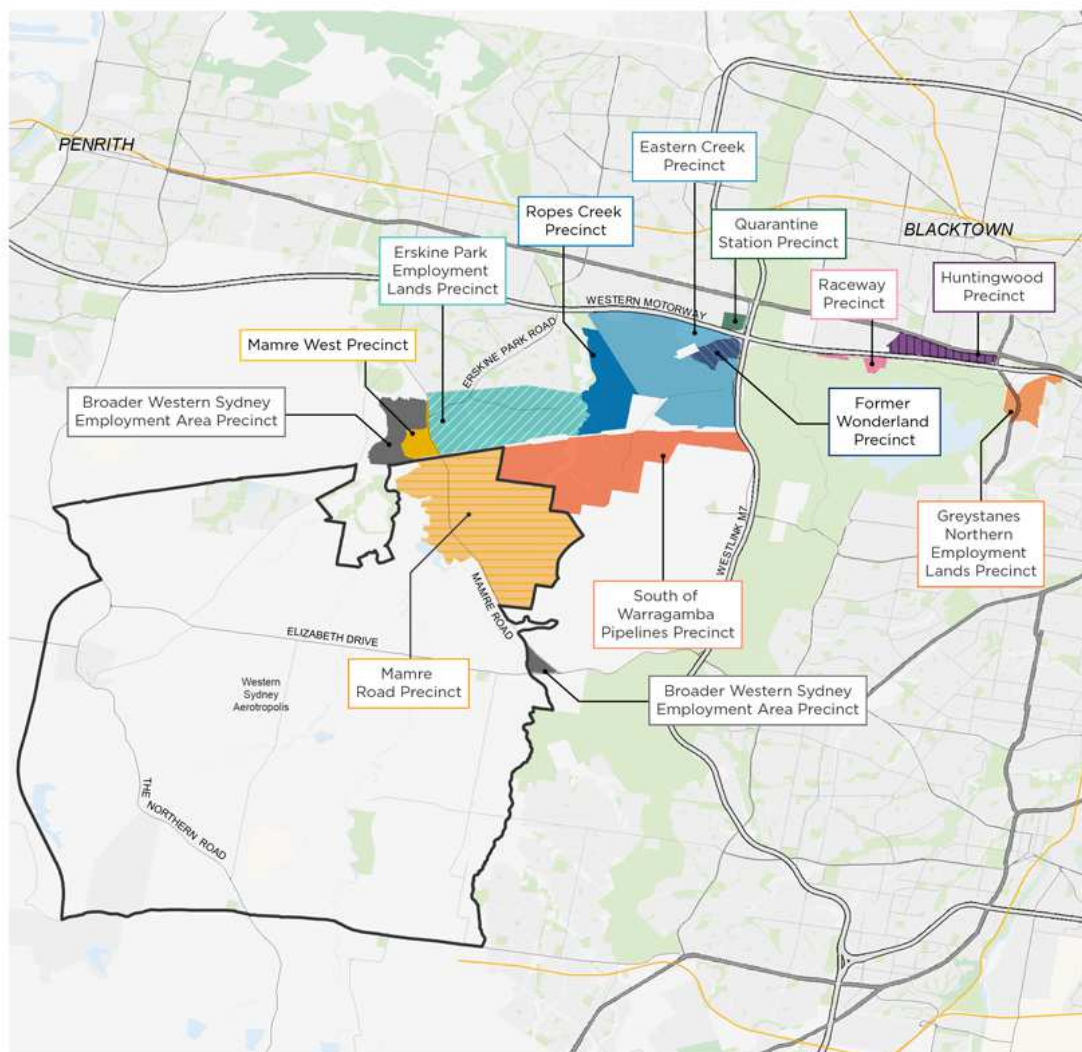
EXECUTIVE SUMMARY

Australian Bushfire Protection Planners Pty Limited has been commissioned by DCI to prepare a report to provide advice on the bushfire protection measures required for the proposed MOD 2 to the DCI Data Centre on Lots 32 & 33 in DP140168, Lot 34 in DP 1131779 and Lot 25 in DP 1122038, No. 90 & 102 Peter Brock Drive and No. 5 Raceway Place, Eastern Creek.

The original SSDA was prepared under Division 4.7 of the Environmental Planning and Assessment Act 1979 (EP&A Act) for the construction and operations of a Data Centre and associated infrastructure.

The site is zoned for IN1 – General Industrial uses as defined within the State Environmental Planning Policy (Western Sydney Employment Area) 2009 (SEPP WSEA) – Raceway Precinct.

Figure 1 - Eastern Creek Employment Lands Precinct



The site is located to the south of Peter Brock Drive and to the east of Raceway Drive and contains the existing DCI SYD01 Data Centre.

Lot 32 in DP 1140168 contains a building occupied by Cargo King and Lot 33 in DP 1140168 contains a building occupied by Pozitive Sign & Graphic Supplies.

The development proposal includes the demolition of these buildings and construction of a four storey Data Hall building, associated infrastructure and car parking

The proposal also includes the construction of a new Secure Entry and Lobby and covered Pathway between the existing SD01 Lobby and the new building. New Switch Rooms, Cooling Tanks and HV cables are located adjacent to the southern boundary.

The land to the east of the site, beyond Peter Brock Drive, is vacant land that contains unmanaged vegetation.

The land to the southeast of the site, beyond the power line easement, is vacant land that forms part of the Prospect Reservoir that contains unmanaged vegetation.

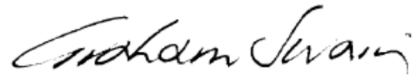
The Blacktown Council Bushfire Prone Land Map indicates that the site is impacted by the buffer zone to Category 1 Bushfire Prone Vegetation on the vacant land to the east and the Category 1 Bushfire Prone Vegetation within the Prospect Reservoir to the southeast.

The Planning Secretary's Environmental Assessment Requirements (SEARs) Key Issues under Application Number SSD-21342738 were provided to support the original SSDA and have been used to guide the modification.

Therefore, this report undertakes an assessment to examine the measures required to minimise bushfire risk on the proposed development and determines the deemed-to-satisfy bushfire protection requirements in accordance with the provisions of *Planning for Bushfire Protection 2019*.

The report provides recommendations on the provision of Asset Protection Zones [Defendable Spaces] and bushfire construction standards to the building, the adequacy of fire-fighting access and water supplies, the management of the Asset Protection Zones [Defendable Spaces] and evacuation protocols necessary to address the bushfire risk to the proposed development and to address the aim and objectives of *Planning for Bushfire Protection 2019*.

The report has found that the requirements of *Planning for Bushfire Protection 2019* have been met and the Key Issue – Bushfire of the original SEARs has been satisfactorily addressed.



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

Fire Protection Association Australia Member No 48781

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SECTION 1

INTRODUCTION

1.1 Aim of this Assessment.

The aim of this Bushfire Protection Assessment is to address the original Secretary's Environment Assessment Requirements [SEARS], which required an assessment to be undertaken against the requirements of *Planning for Bushfire Protection 2019*.

To achieve the specific bushfire requirement of the original SEARS the following will be examined:

- Determine the classification of the vegetation on and surrounding the site in accordance with the vegetation classification system contained in *Planning for Bushfire Protection 2019*;
- Undertake an assessment to determine the slope of the land on and surrounding the development site;
- Undertake a Bushfire Protection Assessment to determine bushfire protection strategies for the proposed development that address the following matters:
 - (i) The provision of building setbacks (Defendable Space) from vegetated areas and the siting of buildings to minimize the impact of radiant heat and direct flame contact;
 - (ii) Fire fighting water supplies;
 - (iii) Access requirements for emergency service vehicles;
 - (iv) Construction standards to be used for the future buildings within the proposed development to minimize the vulnerability of buildings to ignition from radiation and ember attack;
 - (v) Land management responsibilities; and
 - (vi) Evacuation management.

1.2 Statutory Requirements.

This assessment has been prepared having regard to the following legislative and planning requirements:

1.2.1 Legislation.

(a) *Environmental Planning and Assessment Act (EPA Act)*

Planning and development within NSW is regulated by the *Environmental Planning & Assessment Act, 1979* (EPA Act).

In relation to bushfire planning for development in bushfire prone areas in NSW Section 4.14 requires the consent authority, prior to issuing consent for the development, to determine whether the development complies with '*Planning for Bushfire Protection 2019*'.

(b) *Rural Fires Act 1997*

The objectives of the *Rural Fires Act* are to provide:

- The prevention, mitigation and suppression of fires;
- Coordination of bushfire fighting and prevention;
- Protection of people and property from fires; and
- Protection of the environment.

In relation to the management of bushfire fuels on public and private lands within NSW Sections 63(1) and 63(2) require public authorities and owners / occupiers of land to take all practicable steps to prevent the occurrence of bushfires on, and to minimize the danger of the spread of bushfires.

(c) *Rural Fires Regulation 2013.*

Section 44 of the *Rural Fires Regulation 2013* relates to planning for new residential, rural residential and special fire protection purpose developments in bushfire prone areas in NSW and provides details of the matters that are required to be addressed for the issue of a *Bushfire Safety Authority* under Section 100B of the *Rural Fires Act*.

1.2.2 Planning Policies.

Planning for Bushfire Protection – 2019. (NSW Rural Fire Service)

This document provides guidance on the planning and development control processes in relation to bushfire protection measures for rural residential and residential subdivision, "*Special Fire Protection*" and Class 5 – 8 and 10 buildings in bushfire prone areas [Industrial buildings are Class 7 as defined by the Building Code of Australia].

These measures include the provision of defensible space requirements and access/water supply provisions to Class 5 – 8 & 10 developments in bushfire prone areas.

Provision for the assessment of construction standards to buildings and management / maintenance of the Asset Protection Zones/defensible space to buildings is also provided.

1.3 Documentation Reviewed.

The following documents were reviewed in the preparation of this assessment:

- Architectural documents for the proposed DCI SYD02 Data Centre prepared by DEM;
- Blacktown Council Certified Bushfire Prone Land Map;
- *Planning for Bushfire Protection 2019* prepared by the NSW Rural Fire Service;
- Australian Standard A.S. 3959 – 2018 – ‘*Construction of Buildings in Bushfire Prone Areas*’

1.4 Site Inspection.

Graham Swain of *Australian Bushfire Protection Planners Pty. Limited* inspected the development site on the 19th February 2008 to assess the topography, slopes, vegetation classification and land use within and adjoining the development site. Adjoining properties were also inspected to determine the surrounding land use / land management.

A desk-top review of the site and adjoining land was undertaken prior to the commencement of this report.

1.5 Development Proposal.

This report has been prepared to provide advice on the bushfire protection measures required for the proposed MOD 2 to the DCI Data Centre and associated infrastructure on Lots 32 & 33 in DP140168, Lot 34 in DP 1131779 and Lot 25 in DP 1122038, No. 90 & No. 102 Peter Brock Drive and No. 5 Raceway Place, Eastern Creek.

The development proposal includes the demolition of the buildings on Lot 32 & 33 in DP 1140168 and construction of a four storey Data Hall building, back-up power system, associated infrastructure, car parking and Secure Entry and Lobby.

The existing building occupied by Thompson Controls, located in the southeast corner of the development site, will be demolished to make way for the construction of a new Zone Substation.

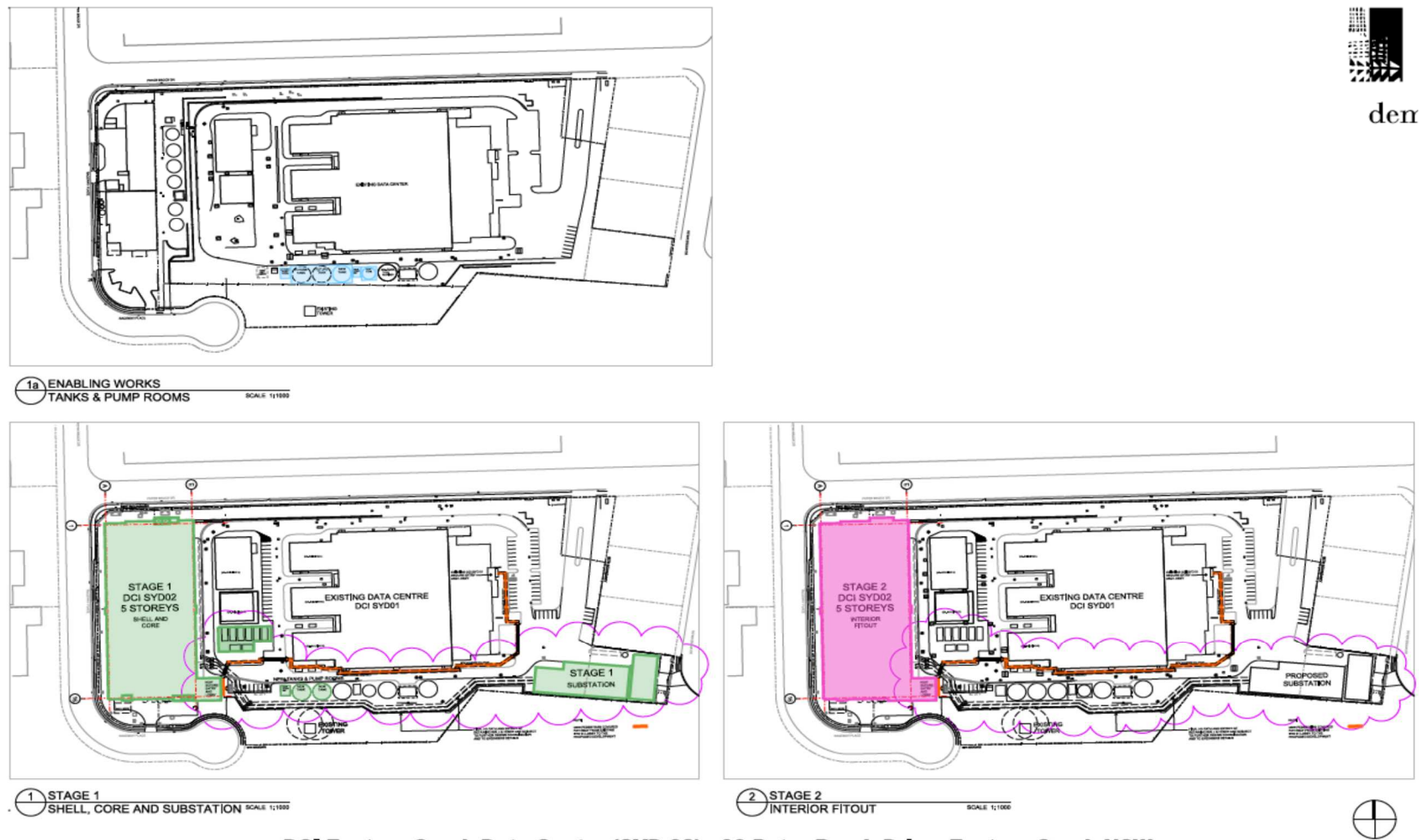
[Refer to Plans & Elevations of Data Centre Complex on Page 10 - 16].

[Refer to Elevations of the Substation on Page 17].





Figure 3 – Staging Plans of Data Centre Complex.



DCI Eastern Creek Data Centre (SYD 02) - 90 Peter Brock Drive, Eastern Creek NSW



Figure 4 – Ground Floor Plan of the DCI SYD02 Data Centre.

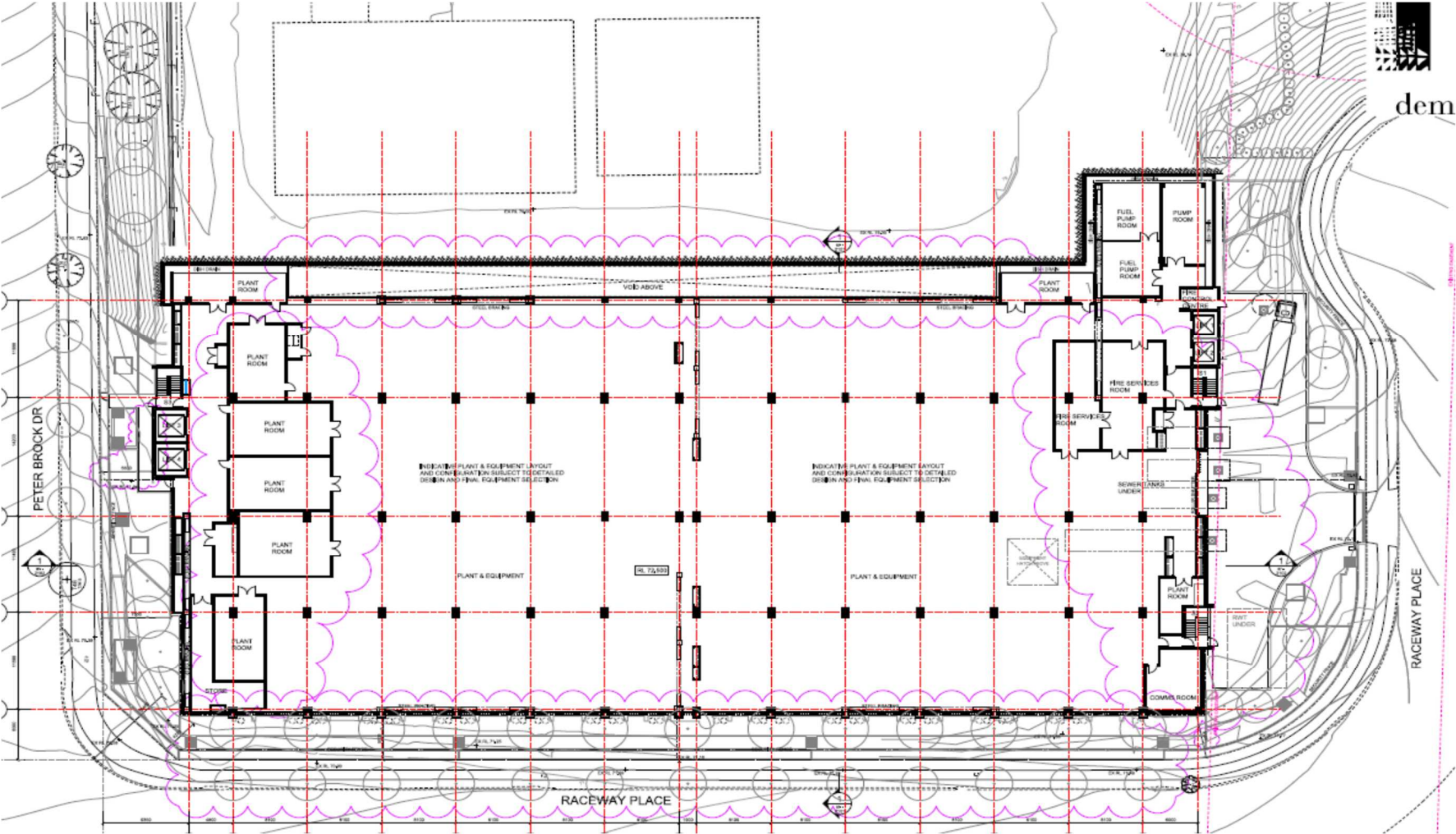




Figure 5 – Upper Ground Floor Plan of the DCI SYD02 Data Centre.

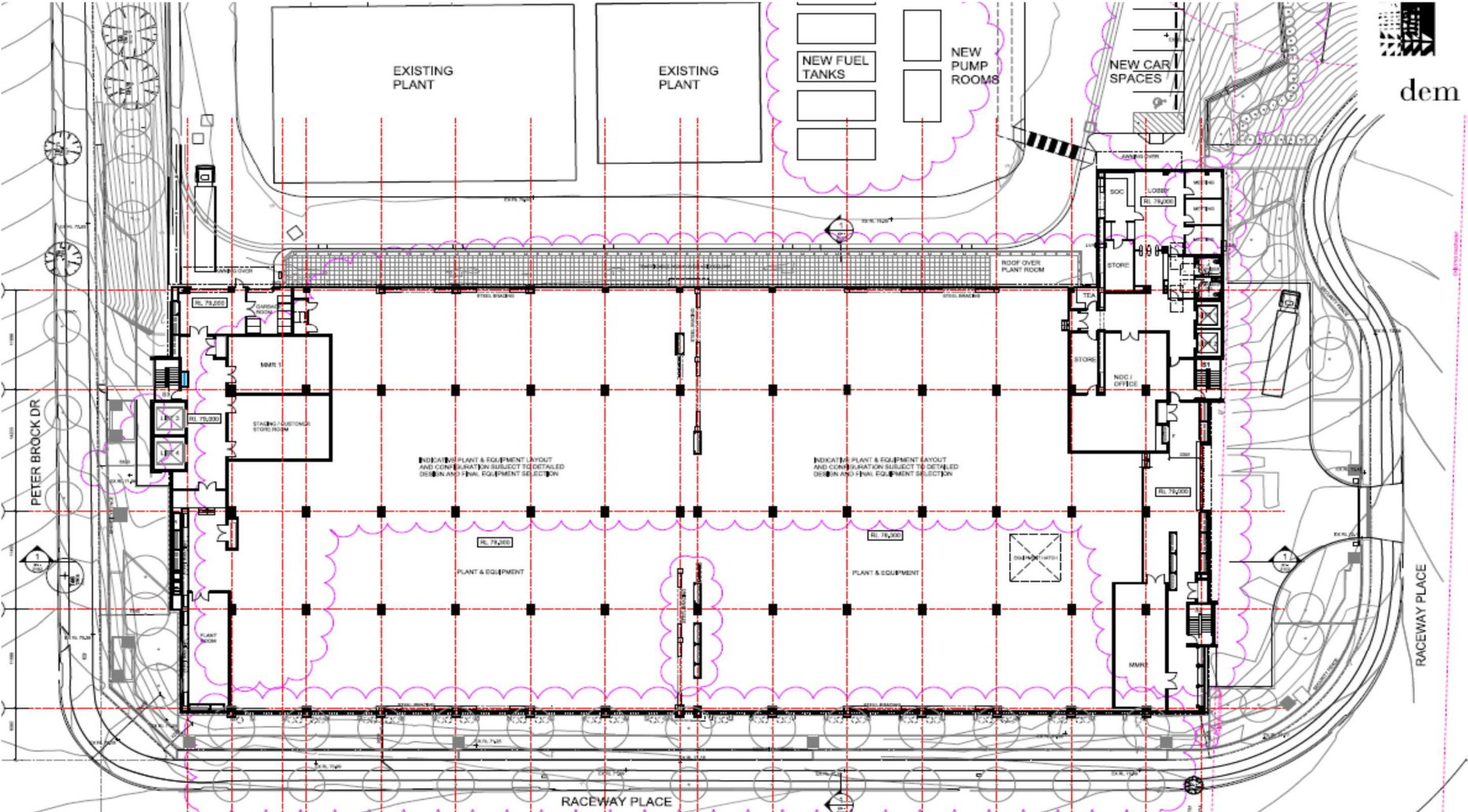




Figure 6 – Level One Floor Plan of the DCI SYD02 Data Centre.

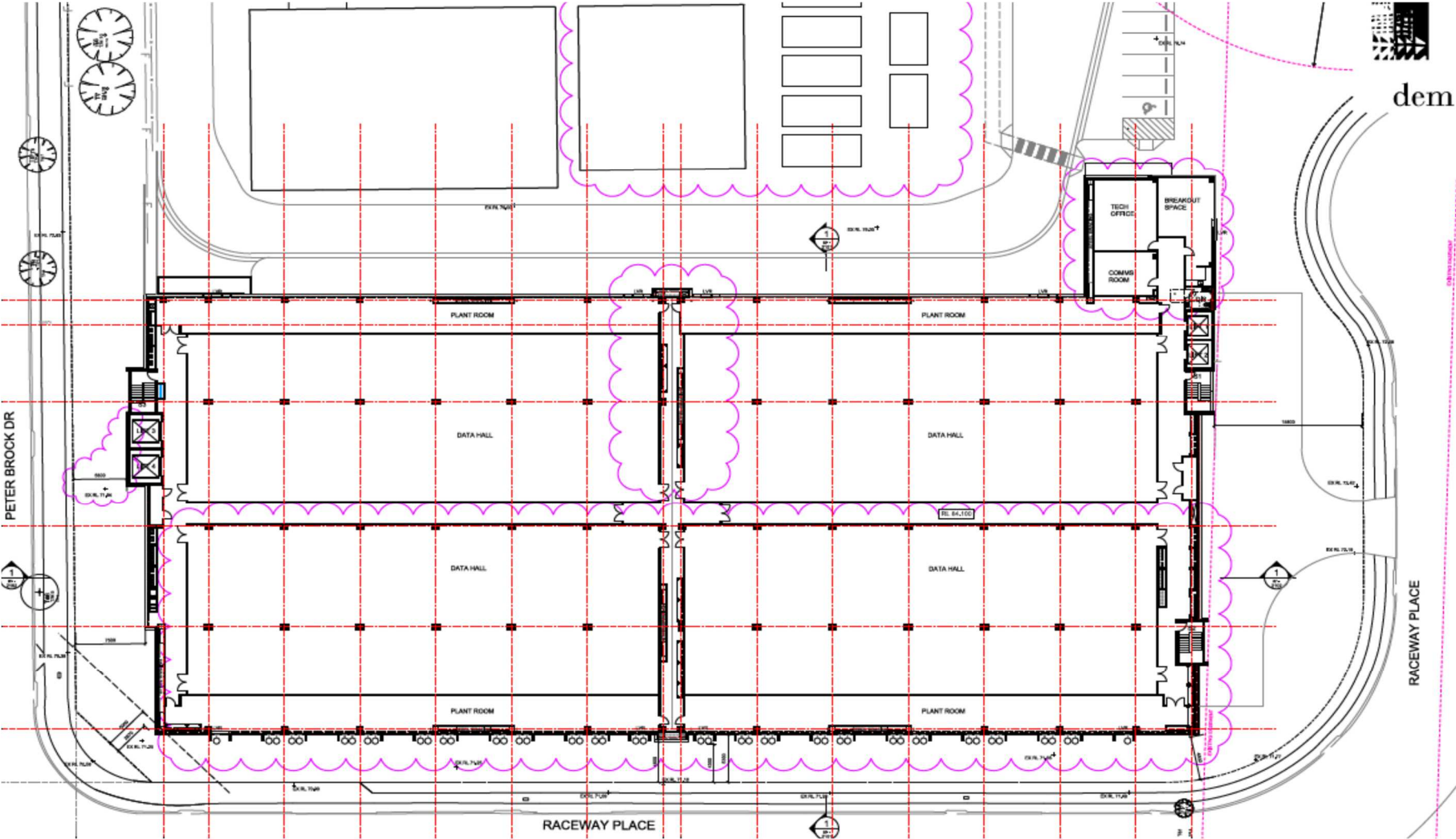




Figure 7 – Level Two Floor Plan of the DCI SYD02 Data Centre.

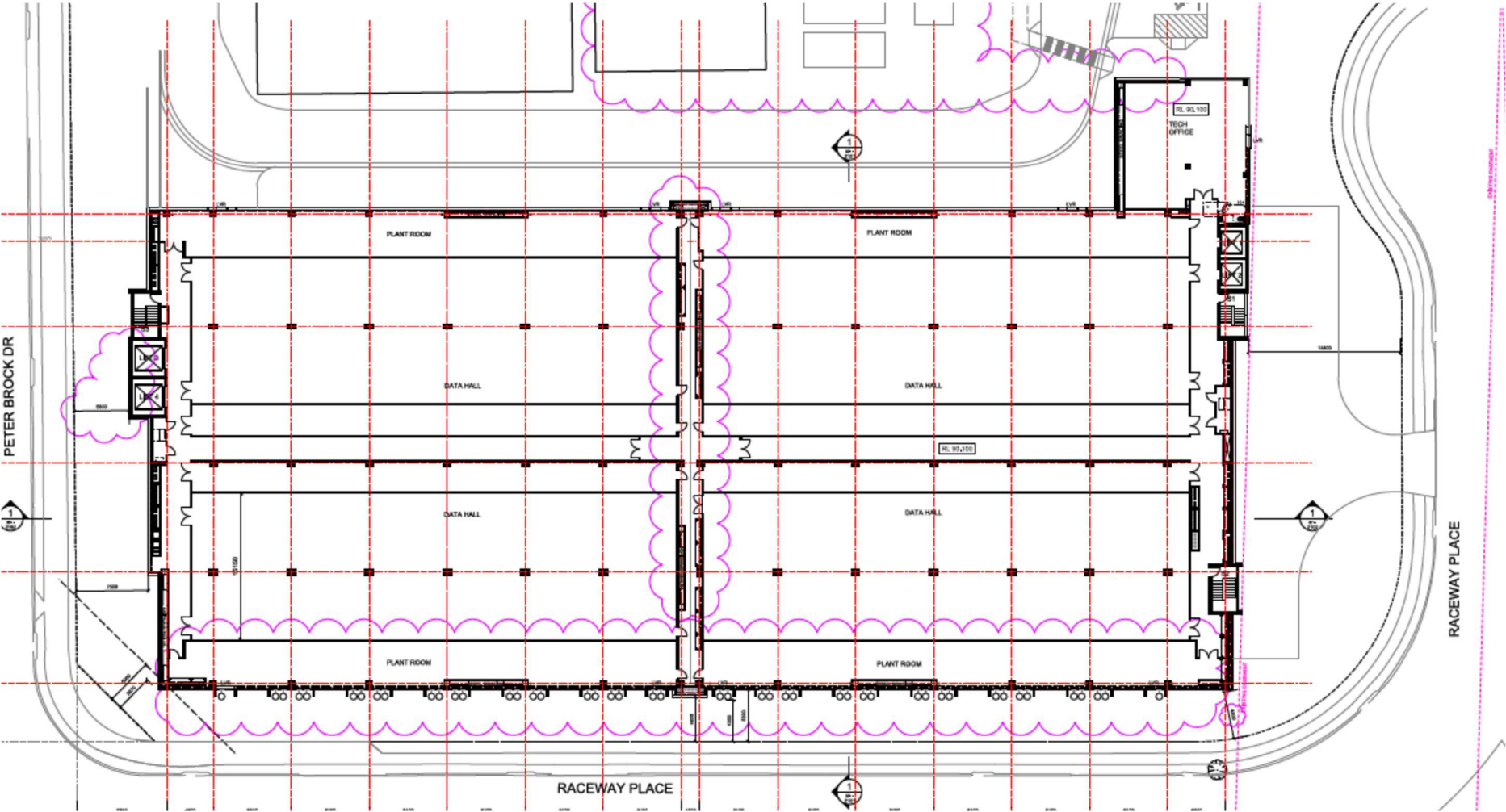




Figure 8 – Level Three Floor Plan of the DCI SYD02 Data Centre.

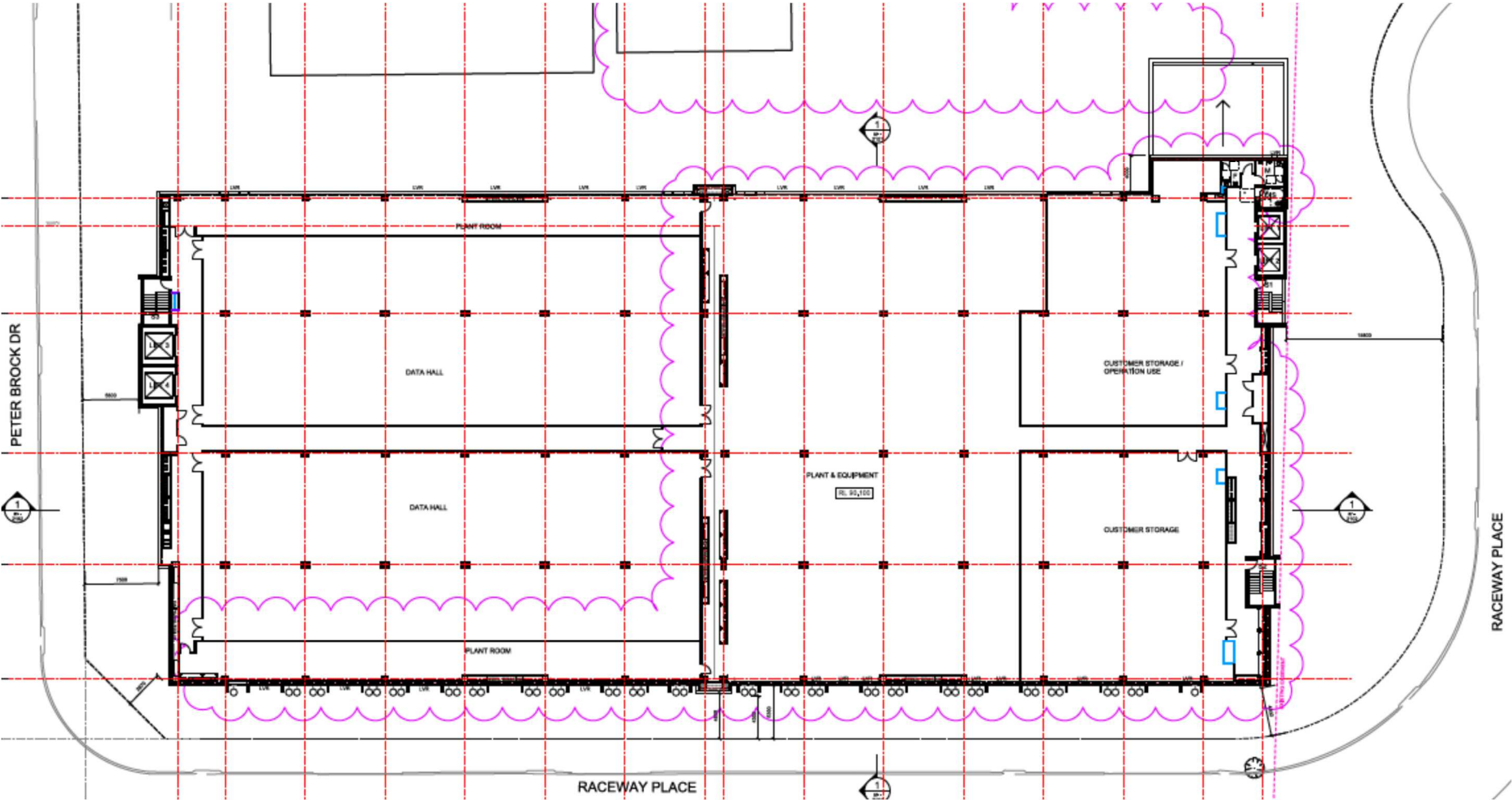




Figure 9 – Perspective View of the DCI SYD02 Data Centre.





Figure 10 – West Elevation of the DCI SYD02 Data Centre.

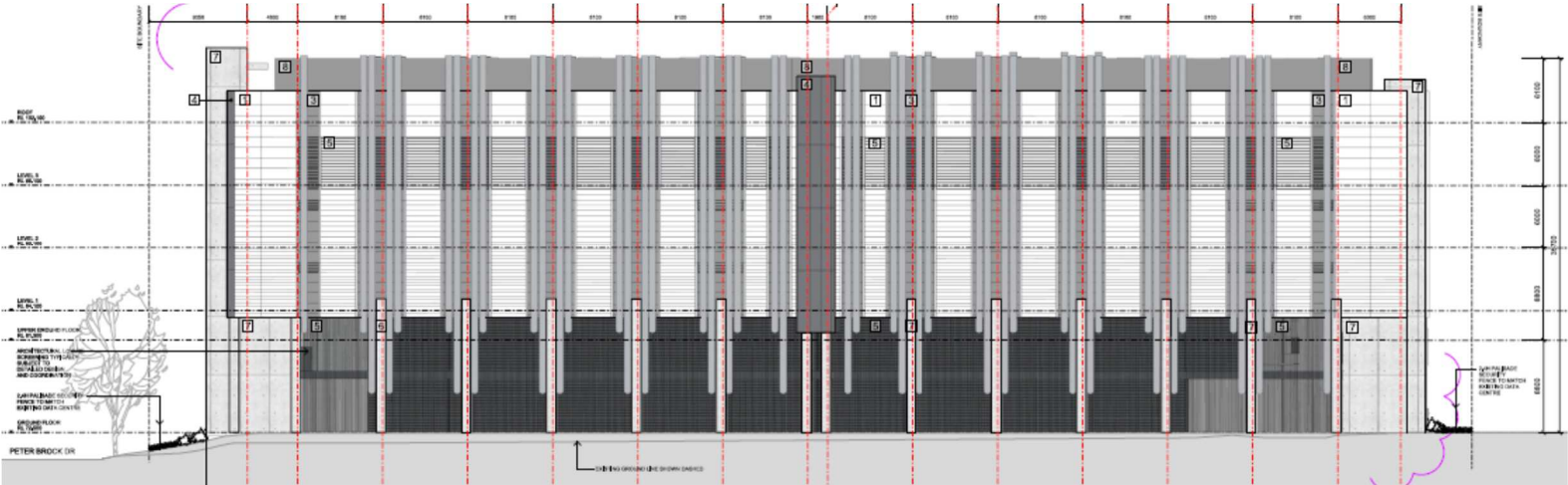
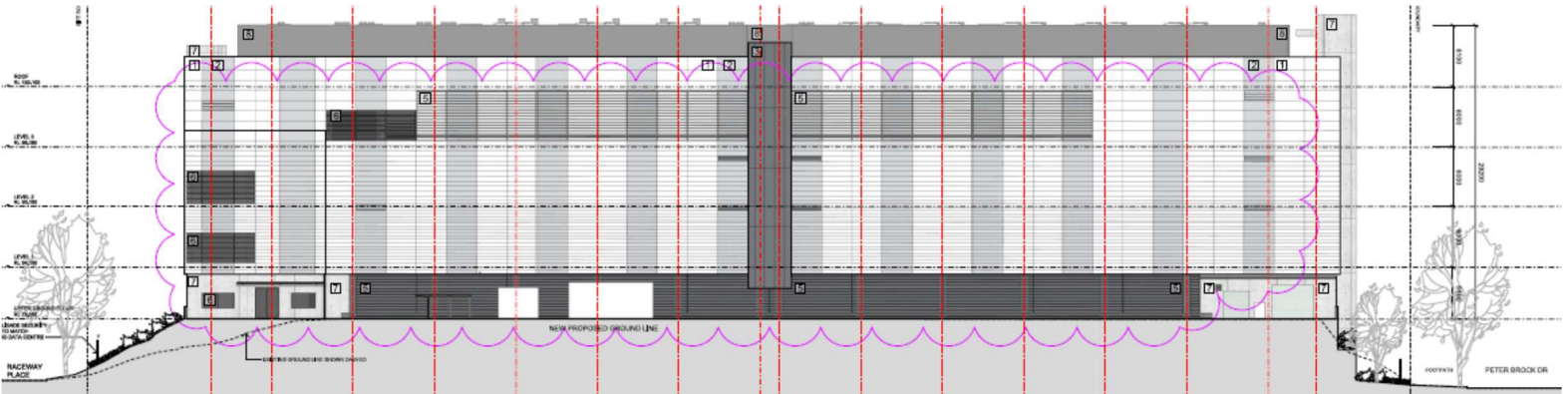


Figure 11 – East Elevation of the DCI SYD02 Data Centre.



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Figure 15 – East Elevation of Substation.

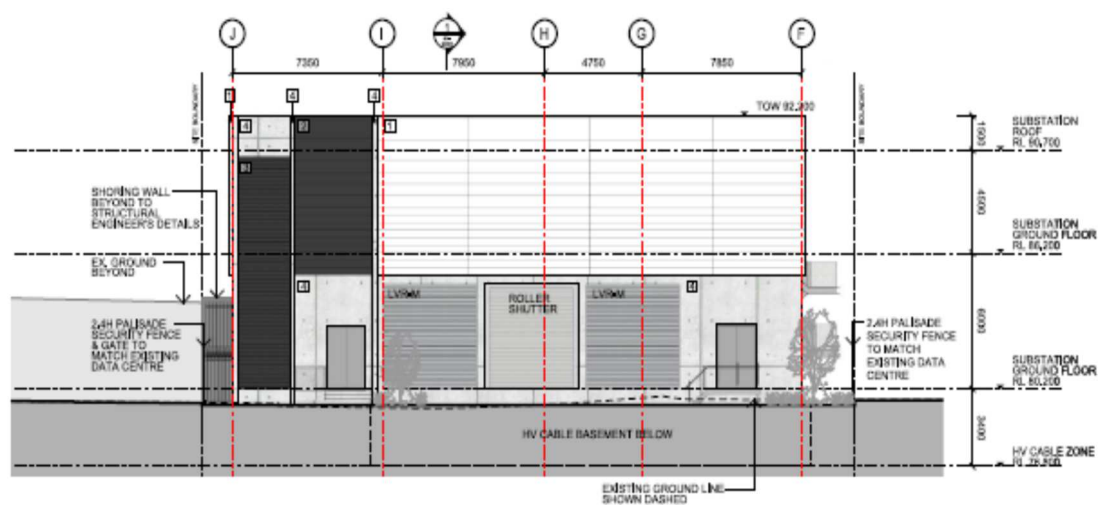
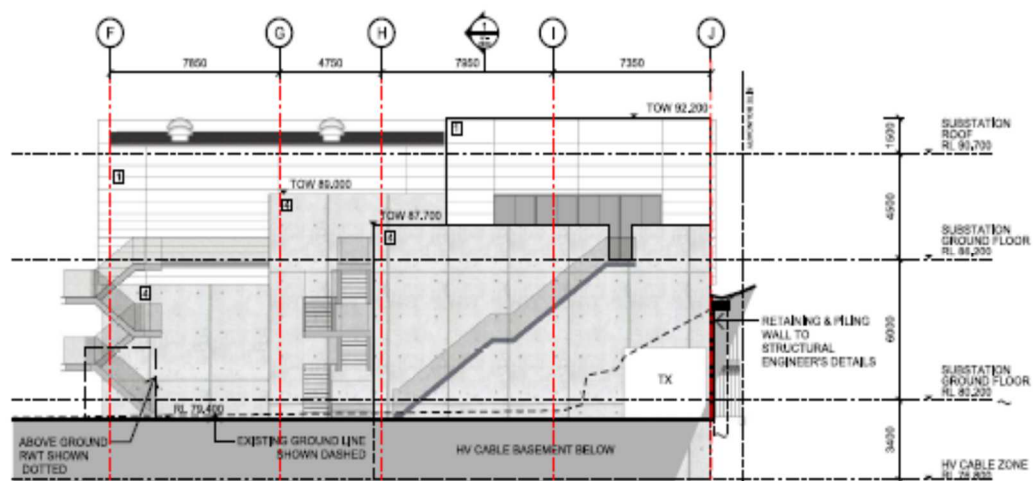


Figure 16 – West Elevation of Substation.



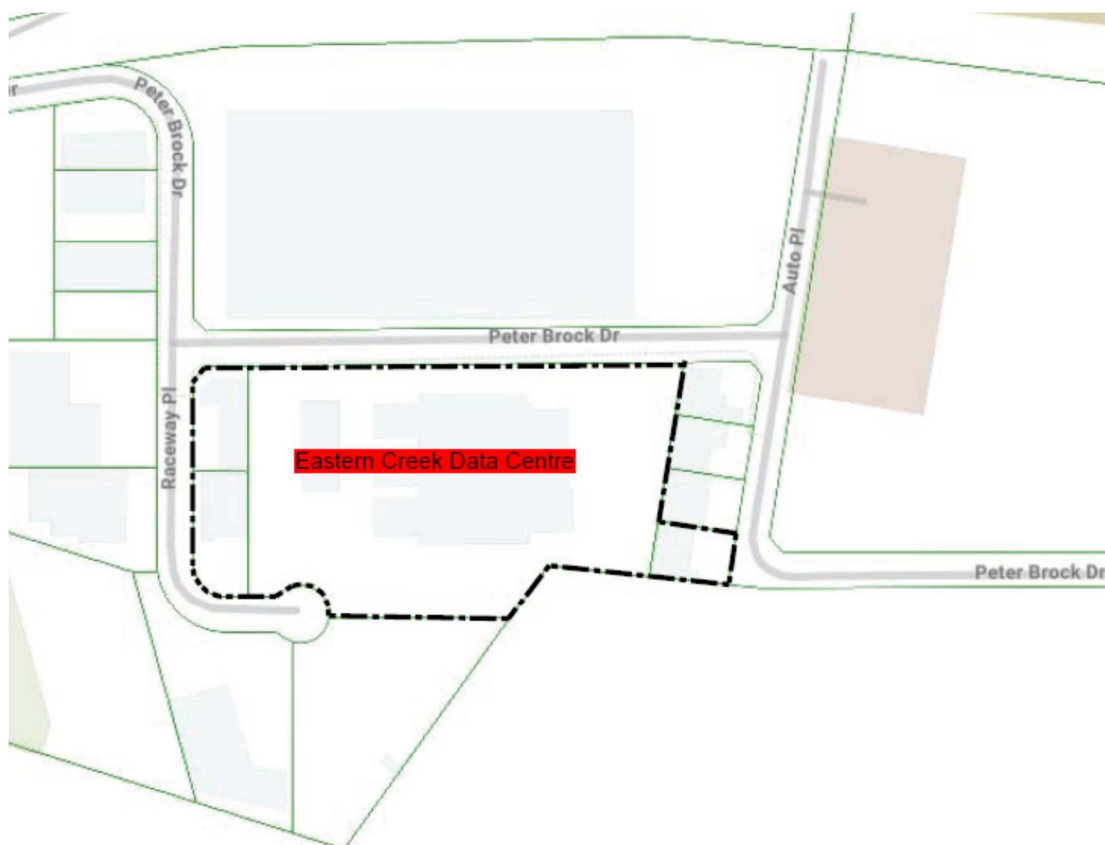
SECTION 2

DESCRIPTION OF DEVELOPMENT SITE

2.1 Location & Description.

The Eastern Creek Data Centre occupies Lot 34 in DP 1131779, Lots 32 & 33 in DP 1140168 and Lot 25 in DP 1122038, No. 90 Peter Brock Drive, Eastern Creek and is located in the Local Government Area [LGA] of Blacktown City Council.

Figure 17 – Location of the Development Site.



2.2 Existing Land Use.

The site contains the existing Eastern Creek Data Centre (SYD01) and associated buildings.

2.3 Adjoining Land Use.

The Data Centre site is adjoined to the southwest, west and north by existing industrial development. The land to the southeast of the Data Centre site is vacant land that forms part of the Prospect Reservoir.

The land to the east contains the Community and Road Education Scheme complex and vacant land.

Figure 18 – Aerial Photograph of the Data Centre Site and adjoining land.



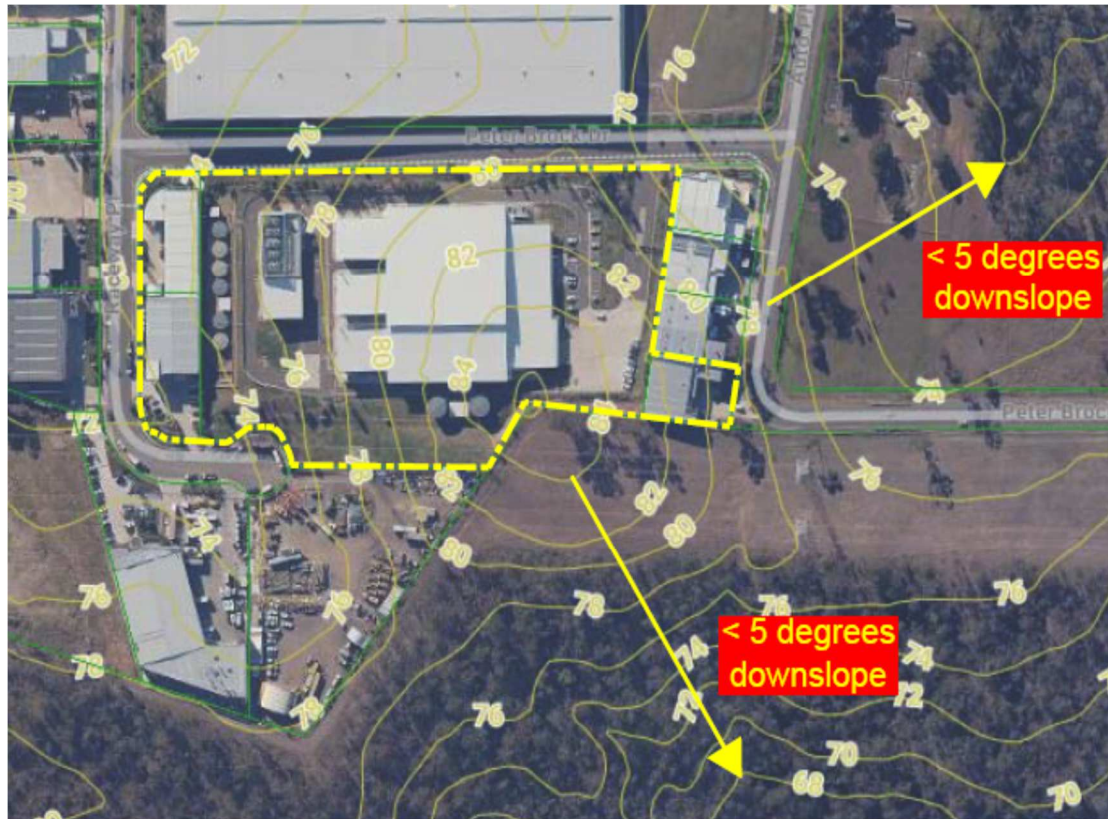
2.5 Topography.

Appendix 2 of *Planning for Bushfire Protection 2019* states that slopes should be assessed, over a distance of at least 100m from a development site and that the gradient of the land should be determined which will most significantly influence the fire behaviour on the site.

The topography of the land within the development site is level. The industrial land to the southwest and west of the development site is level.

The land to the southeast and east of the development site falls to the southeast and east at 0 – 5 degrees.

Figure 19 – Contour Plan showing gradients on the land under the Bushfire Prone Vegetation.



2.6 Vegetation Communities on the land within the Development Site.

Vegetation is classified using Figure A1.2 of *Planning for Bushfire Protection 2019*, which classifies vegetation types into the following groups:

- (a) Rainforest;
- (b) Wet Sclerophyll Forest;
- (c) Dry Sclerophyll Forest;
- (d) Woodland;
- (e) Tall Heath;
- (f) Short Heath; and
- (g) Grassland.

The vegetation within the Data Centre site and on the adjoining industrial development consists of landscaped gardens.

2.7 Bushfire Vegetation Communities adjoining the Data Centre Site.

The vegetation within the Prospect Reservoir consists of Cumberland Plain Woodland. This vegetation is classified under Keith as Cumberland Dry Sclerophyll Forest.

The vegetation on the land to the east of Peter Brock Drive consists of remnant Cumberland Plain Woodland which has been substantially modified to now respect open, grassy woodland.

2.8 Significant Environmental Features on the land within the Data Centre Site.

The Data Centre site does not contain any significant environmental features such as Coastal Wetlands; Littoral Rainforests; Koala Habitat; areas of geological interest; steep lands [>18 degrees]; land slip areas; National Parks Estate or riparian corridors.

2.9 Known Threatened Species, Populations, Endangered Ecological Communities or Critical Habitat on the land within the Data Centre Site.

There are no known threatened species, populations, endangered ecological communities or critical habitat within the Data Centre site.

2.10 Details of Aboriginal/European Heritage within the Data Centre Site.

There are no known Aboriginal sites, relics or European heritage within the Data Centre site.

SECTION 3

BUSHFIRE HAZARD ASSESSMENT

3.1 Certified Bushfire Prone Land Map.

Section 10.3 of the *Environmental Planning & Assessment Act 1979* requires councils, where a Bushfire Risk Management Plan applies, to prepare a Bushfire Prone Land Map in consultation with the Commissioner of the NSW Rural Fire Service. The Commissioner will designate lands to be Bushfire Prone within an area and, when satisfied that the lands have been recorded on a map, will certify the map as a Bushfire Prone Land Map for the purposes of this or any other Act.

Figure 20 – Extract from the Blacktown Bushfire Prone Land Map.



The Blacktown BFPLM map records the Data Centre site as containing the buffer zone to the Category 1 [Red colour] Bushfire Prone Vegetation on the land to the southeast and east.

SECTION 4

BUSHFIRE PROTECTION ASSESSMENT

4.1 Introduction.

The Prospect Reservoir to the southeast and the land to the east of Peter Brock Drive contain Category 1 Bushfire Prone Vegetation with the buffer zone impacting upon the Data Centre site.

Therefore, the construction of the proposed expansion is required to comply with the provisions of Section 4.14 of the *Environmental Planning & Assessment Act 1979*.

Section 4.14 of the *Environmental Planning and Assessment Act* requires that the proposed development comply with the requirements of *Planning for Bushfire Protection 2019* with respect to the protection of persons, property and the environment from the danger that may arise from a bushfire.

The aim of *Planning for Bushfire Protection 2019* is to 'provide for the protection of human life and minimise impacts on property from the threat of bushfire while having due regard to development potential and protection of the environment'.

Bushfire protection can be achieved through a combination of strategies which are based on the following principles:

- (i) Control the types of development permissible in bushfire prone areas;
- (ii) Minimise the impact of radiant heat and direct flame contact by separating development from bushfire hazards;
- (iii) Minimise the vulnerability of buildings to ignition and fire spread from flames, radiant heat and embers;
- (iv) Enable appropriate access and egress for the public and fire-fighters;
- (v) Provide adequate water supplies for bushfire suppression and operations;
- (vi) Focus on property preparation, including emergency planning and property maintenance requirements; and
- (vii) Facilitate the maintenance of Asset Protection Zones (APZs), fire trails, access for fire-fighting and on site equipment for fire suppression.

Planning for Bushfire Protection 2019 provides the following objectives for Class 5 to 8 buildings:

- (i) *Provide safe access to/from the public road system for fire-fighters providing property protection during bushfire and for occupant egress for evacuation;*
- (ii) *Provide suitable emergency and evacuation (and relocation) arrangements for occupants of the development;*
- (iii) *Provide adequate services of water for protection of buildings during and after the passage of bushfire and to locate gas and electricity so as not to contribute to the risk of a fire to a building; and*
- (iv) *Provide for the storage of hazardous materials away from the hazard.*

'The general fire safety construction provisions of the NCC are taken as acceptable solutions, however construction requirements for bushfire protection will need to be considered on a case by case basis'.

Planning for Bushfire Protection 2019 does not provide specific deemed-to-satisfy protection measures for Class 5 to 8 buildings as defined by the Building Code of Australia. However, compliance with A.S.3959 - 2018 must be considered when meeting the aims and objectives of *Planning for Bushfire Protection 2019*.

Section 4.2 of this report examines the development proposal in relation to the provision of a suitable “defendable space” between the bushfire hazard and the Data Centre building.

The bushfire construction standards to the Data Centre building is examined in Section 5.3 and the provision of access and water supplies for fire-fighting operations management of the defendable space [Asset Protection Zone] and evacuation planning are examined in Sections 5.4 – 5.9 of this report.

4.2 The provision of Defendable Space/s [Asset Protection Zones].

Defendable Spaces/Asset Protection Zones [APZs] have been assessed for the expansion to the existing Data Centre in accordance with *Planning for Bushfire Protection 2019* and Australian Standard A.S. 3959 – 2018 (using effective slope and predominant vegetation communities).

The assessment is based on the predominant vegetation on the adjoining land to the southeast of the Data Centre site being Cumberland Dry Sclerophyll Forest and the vegetation on the land to the east of Peter Brock Drive being remnant Open Grassy Woodland.

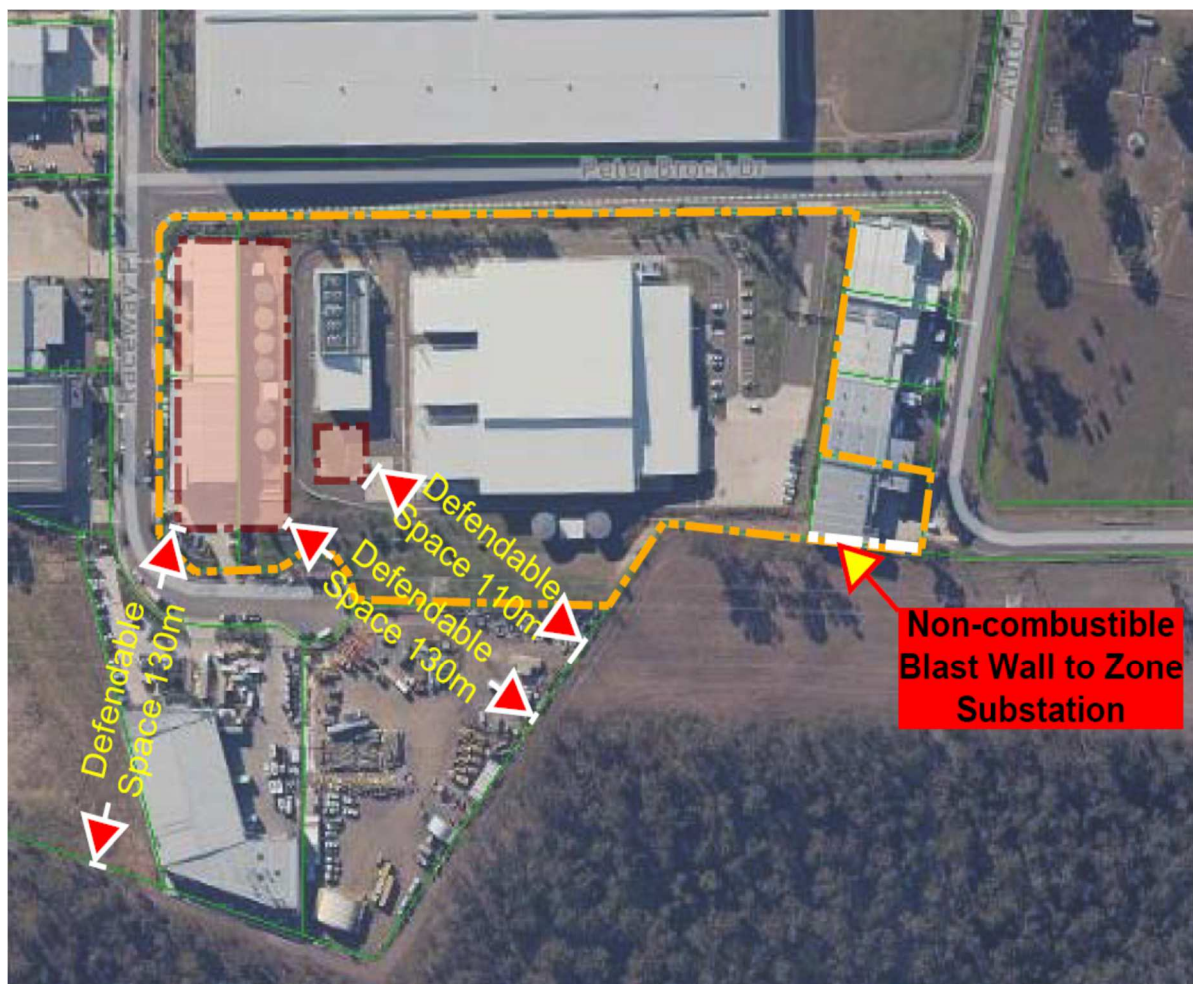
The land within Prospect Reservoir falls to the southeast at 0 – 5 degrees. The land to the east of Peter Brock Drive falls to the east/northeast at 0-5 degrees – refer to Figure 19.

The NSW Rural Fire Service's requirement for industrial buildings is to provide a setback from the bushfire prone vegetation which will minimise flame contact on a building.

Table A1.12.5 of *Planning for Bushfire Protection 2019* identifies that to prevent flame contact on the proposed expansion building the minimum width of the Defendable Space is 22 metres. The actual width of the Defendable Space to the southeast and southwest of the building containing the Data Halls is more than 130 metres and more than 110 metre to the southeast corner of the Fuel Tanks and Pump Room.

The defendable space to the vegetation to the east of Peter Brock Drive exceeds 250 metres. The Defendable Space to the vegetation

Figure 21 – Fire Protection (Defendable Space) Plan.



4.3 Construction Measures to the Data Centre Building.

The width of the Defendable Space between the new buildings and the hazard on the land to the southeast and southwest, within the Prospect Reservoir, exceeds 100 metres.

Therefore, no bushfire construction standards apply to both buildings.

A non-combustible Blast Wall is recommended to the southern elevation of the Substation.

4.4 Access Standards for Firefighting Operations.

Appendix 3 “Access” of *Planning for Bushfire Protection 2019* provides specifications on the access provisions for fire-fighting operations within developments which are subject to bushfire attack.

Vehicular access to the proposed expansion to the Eastern Creek Data Centre complex will be provided from Raceway Place which is a public road designed and constructed to accommodate heavy rigid and articulated vehicles and provides complying access for emergency service vehicles and fire-fighting appliances.

4.5 Water Supplies for Firefighting Operations.

The existing fire-fighting water supply shall be extended to service the new buildings.

Electricity and gas supplies will be laid underground and therefore address the performance standard of Chapter 4 of *Planning for Bushfire Protection 2019*.

4.6 Emergency Management for Fire Protection / Evacuation.

The expansion to the existing Data Centre is unlikely to be subject to a fire event that will create the need for the evacuation of the new buildings.

Due to the low bushfire risk there is no requirement for the preparation of a specific Bushfire Evacuation Plan or a Bushfire Management Plan for the new buildings.

However, the management of evacuation of the staff/visitors will need to be addressed in the preparation of a site specific Evacuation Plan for the new buildings.

The Evacuation Plan shall address the protocols for the timely relocation of staff/visitors in the event that an emergency occurs, both within the site or within the local area.

The Evacuation Plan shall comply with A.S. 3745:2010 “*Planning for Emergencies in Facilities*”.

A copy of the Evacuation Plan shall be provided to the Local Emergency Management Committee/Police, Fire & Rescue NSW and NSW Rural Fire Service.

4.7 Bushfire Hazard Management.

The management of the Defendable Spaces within the site shall comply with the specifications of Appendix 4 of *Planning for Bushfire Protection 2019* and *Standards for Asset Protection Zones*.

SECTION 5

BUSHFIRE MANAGEMENT STRATEGIES

Strategies to address the aim and objectives of *Planning for Bushfire Protection 2019* are as follows:

Strategy 1 – Defendable Space:

The Defendable Spaces shall be maintained as an Inner Protection Area (IPA) - Asset Protection Zone.

Strategy 2 – Landscape Management:

The design and maintenance of the landscaped gardens within the site shall comply with the prescriptions of an Inner Protection Area [IPA] pursuant to the specifications of Appendix 4 of *Planning for Bushfire Protection 2019* and the NSW Rural Fire Services document '*Specifications for Asset Protection Zones*'.

The management of the landscaped gardens [defendable space] shall be maintained under the terms of a positive covenant, pursuant to Section 88B of the *Conveyancing Act of 1909*, on the title of the land.

Strategy 3 – Evacuation Plan:

The management of evacuation of the staff/visitors will be addressed in the preparation of a site specific Evacuation Plan for the new buildings.

The Evacuation Plan shall address the protocols for the timely relocation of staff/visitors in the event that an emergency occurs, both within the site or within the local area.

A copy of the Evacuation Plan shall be provided to the Local Emergency Management Committee/Police, Fire & Rescue NSW and NSW Rural Fire Service.

The Evacuation Plan shall comply with AS 3745:2010 "*Planning for Emergencies in Facilities*".

SECTION 6

CONCLUSION

A Modification (MOD 2) is being lodged for the construction of the DCI SYD02 Data Centre complex on No. 90 Peter Brock Drive, Eastern Creek.

The original SEARS [Secretary's Environmental Assessments Requirements] under SSD-21342738 does not specifically require the EIS for the works to address bushfire risk.

However, under Policies, Guidelines & Plans the original SEARs refers to *Planning for Bushfire Protection 2019*. Therefore, this report examines the proposed MOD 2 against the specifications and requirements of *Planning for Bushfire Protection 2019*.

An examination of the Blacktown Bushfire Prone Land Map has determined that the Data Centre site is impacted by the buffer zone to Category 1 Bushfire Prone Vegetation on the land within the Prospect Reservoir, to the southwest and on the vacant land to the east of Peter Brock Drive.

This assessment has reviewed the level of threat to the new buildings in the and has found that the available widths of defendable space between the hazard and the new buildings exceeds the maximum width of Asset Protection Zone (Defendable Space) required by Table A1.12.5 of *Planning for Bushfire Protection 2019*.

The report has determined, due to the new buildings being located more than 100 metres from the bushfire hazard, there is no requirement for the application of bushfire construction standards to the buildings.

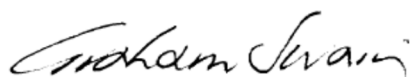
This report has also determined that the existing access and water supplies for fire-fighting operations satisfies the requirements of *Planning for Bushfire Protection 2019*.

Table 1 summarises the extent to which the development conforms to the aim and objectives of *Planning for Bushfire Protection 2019*.

Table 1. Compliance with the aim and objectives of *Planning for Bushfire Protection 2019*.

Bushfire Protection Measure	Compliance with the aim and objectives of <i>Planning for Bushfire Protection 2019</i>.
Defendable Space setbacks/construction standards to future industrial buildings	The provision of a Defendable Space width that exceeds the maximum width required by Table A1.12.5 of <i>Planning for Bushfire Protection 2019</i> addresses the requirement that the occupants are afforded adequate protection from exposure to a bushfire and that the buildings will not be exposed to material ignition.
Access for fire-fighting operations	The existing access roads within the industrial estate comply with the specifications of Appendix 3 of <i>Planning for Bushfire Protection 2019</i> and provide satisfactory emergency access for fire-fighting appliances.
Water supplies for fire fighting	The existing hydrant supply has been installed in accordance with AS 2419.1 – 2021.
Management of the fire protection measures, including the defendable spaces	The owner of the Eastern Creek Data Centre will continue to be responsible for the maintenance of the fire protection measures, including the management of the Defendable Space.
Emergency Management	The owner of the Eastern Creek Data Centre shall address protocols for the management of staff and site facilities during bushfire occurrences.

I confirm that the proposed development complies with the aim and objectives of *Planning for Bushfire Protection 2019* and deemed to satisfy the requirements of Section 8.3.10 of *Planning for Bushfire Protection 2019* – Buildings of Class 5 to 8 and Class 10 of the Building Code of Australia in respect to the provision of asset protection zones [defendable spaces], access and water supplies for bushfire operations.



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

Fire Protection Association Australia Member No 4878

REFERENCES:

- N.S.W Rural Fire Service – *Planning for Bushfire Protection 2019*;
- *Environmental Planning & Assessment Act – 1979*;
- *Rural Fires Act – 1997*;
- *Rural Fires Regulation 2013*;
- NSW Rural Fire Service – *Guideline for Bushfire Prone Land Mapping 2015*;
- *Bushfire Environmental Assessment Code – July 2021*;
- Building Code of Australia;
- Australian Standard A.S. 3959-2018 “*Construction of Buildings in Bushfire Prone Areas*”;
- *Blacktown Bushfire Prone Land Map*.