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Contact: Qualified Firefighter Nathan Everett

8 November 2018

Department of Planning and Environment
C/- Luisa Maguire
GPO Box 39
Sydney NSW 2001

E: Luisa.Maguire @planning.nsw.gov.au

CC: Chloe.Dunlop@planning.nsw.gov.au

Dear Ms Maguire,

**Notice of Exhibition
Prestons Industrial Estate (SSD 7155 MOD 6)
5-35 Yarrunga Street, Prestons (Liverpool LGA)**

I refer to the submission of the Notice of Exhibition (the Notice) dated 02 October 2018 for the above development to Fire + Rescue NSW (FRNSW) for review and comment. It is understood that the Notice is in regard to a modification application for Warehouse 5 of the subject development and includes expansion of the existing warehouse and construction of; ancillary office space, hardstand areas, car parking, and changes to vehicular access. An Environmental Assessment report (the Report) including a number of accompanying drawings and assessments have been prepared in support of the application.

Details of the submitted report are:

- Environmental Assessment Report, Section 4.55(2) Modification, prepared by Urbis Pty Ltd for Logos Property, unknown date, Final Version, report reference: SA7556_Prestons_SSD7155 (MOD 6) Section 4.55(2)

Reference has also been made to the original Environmental Impact Statement (Urbis, March 2016) submission and associated appendices.



It has been the experience of FRNSW that large warehouse facilities pose unique challenges to firefighters when responding to and managing an incident. Factors such as potentially high fuel loads, facility layout, and design of fire safety systems have a significant impact on the ability to conduct firefighting operations safely and effectively. Consultation with organisations such as FRNSW throughout the development process enables the design and implementation of more effective fire safety solutions that help to mitigate the impact of incidents when they occur.

The following notes and comments are provided following a review of relevant parts of the Report and appendices.

- It is noted that in Appendix J – *Hazard and Risk Assessment* of the original submission that SEPP 33 does not apply to the development and a Preliminary Hazards Analysis is not required.
- Appendix E – *BCA Assessment Report* of the original submission has identified that a number of alternative solutions will be required to address the performance requirements of the National Construction Code (NCC).
- The warehouse facility will be considered a 'Large Isolated Building' based on the building size and classification provisions within the NCC.
- It has not been identified if the existing warehouse is serviced by an automated high-bay racking system or if one will be installed within the extension.

The following recommendations are provided following a review of relevant parts of the Report and appendices.

- Consideration be given as to whether the nature or quantity of materials stored in the warehouse would be deemed a special hazard such that parts E1.10 and E2.3 of the NCC are applicable.
- An updated SEPP 33 analysis be undertaken should there be changes to the storage of dangerous goods within the warehouses such that the current assessment is no longer valid.
- Consultation with FRNSW be undertaken by way of the Fire Engineering Brief Questionnaire (FEBQ) process prior to the issue of the relevant construction certificate. This should be inclusive of the existing warehouse such that the fire safety systems of the entire facility can be considered as a whole.
- If an automated racking equipment is to be installed in the warehouse that details be included in the above FEBQ/Fire Engineering Report (FER).
- Consideration be given to provision of adequate hydrant and hose reel coverage to all areas of the warehouse with details provided in the FEBQ/FER. Should it be deemed necessary to install additional hydrants internally within the warehouse, FRNSW will need to be consulted as to the proposed locations before support is provided.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS18/2791. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'David Lewis', with a long horizontal flourish extending to the right.

David Lewis
Chief Superintendent Fire Safety
Community Safety Directorate