

BUSHFIRE PROTECTION ASSESSMENT

FOR MOD 7 and LOT O

KEMPS CREEK INDUSTRIAL ESTATE

**No. 200 ALDINGTON ROAD,
KEMPS CREEK**

**FOR
STOCKLAND FIFE KEMPS CREEK PTY LIMITED**

AUSTRALIAN BUSHFIRE PROTECTION PLANNERS PTY LTD
32 Old Dog Trap Road, Somersby NSW 2250
Tel. 612 43622112 / 612 43621184 Mob. 0427 622204
Email. abpp@bigpond.net.au



Australian Bushfire
Protection Planners Pty Ltd
ABN 48 935534 462
Bushfire Mitigation Consultants



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LIMITED.

Report Number	Document	Preparation Date	Issue Date	Directors Approval
B254364 - 5	Final	12.10. 2025	08.01.2026	<i>G.L. Swain</i>

PREAMBLE

An Environmental Impact Statement (EIS) has been prepared in response to Secretary's Environmental Assessment Requirements (SEARs) issued for SSD 96107226.

There are two components to the proposed development:

- The construction of a temperature-controlled warehouse and distribution centre on Lot O at Kemps Creek Industrial Estate, 200 Aldington Road, Kemps Creek
- The modification (in part) of the approved Concept Master Plan for Kemps Creek Industrial Estate (SSD-10479) in order to accommodate the proposed warehouse and distribution centre on Lot O.

Both components are classified as State significant development (SSD).

The applicant, Stockland Fife Kemps Creek Pty Ltd (SFKC) is a joint venture between Stockland and Fife Capital.

Lot O development

The proposed development on Lot O is a temperature-controlled warehouse and distribution centre with a net floor area of 14,617 sqm and configured to accommodate two cold-store logistics operators. Access to the warehouse will be via a mix of recessed docks and on-grade roller shutter doors.

The western tenancy will be referred to as Warehouse 1 & Office 1 with the eastern tenancy being referred to as Warehouse 2 & Office 2. Each tenancy is provided a main office component arranged over two-levels. The tenancies are separated by an internal intertenancy wall and each tenancy will benefit from their own truck entry and exit, hardstand for loading/unloading and car parking. The development's aesthetic appeal will include perimeter landscaping and visual treatments to achieve a desirable streetscape.

The site is zoned IN1 General Industrial under the Chapter 2 of the State Environmental Planning Policy (Industry and Employment) 2021 (I&E SEPP). Industries (other than offensive or hazardous industries) are permitted with development consent within land zoned IN1. Development for the purpose of a warehouse or distribution centre is defined as a type of 'general industry' and therefore falls within the permissible development of 'industries'.

The vision for Lot O, and other lots within the Kemps Creek Industrial Estate, is to create a world class facility for industrial businesses with an emphasis on design quality, sustainability, innovation and a complementary mix of estate occupants.

The warehouse and distribution centre is classified as SSD due to the estimated development cost which is greater than \$50 million, as prescribed under Section 12 of Schedule 1 to the State Environmental Planning Policy (Planning Systems) 2021.

Staged development of the Estate

The Kemps Creek Industrial Estate is being developed in stages, and Condition A4 of SSD-10479 requires that each subsequent stage of the development is to be subject to further development applications.

SSD-10479 was approved on 5 May 2023 for the Stage 1 works which included earthworks, subdivision and a warehouse on Lot F.

Three subsequent development applications have been submitted since this initial development consent, being

- SSD-61212208 for a warehousing and distribution centre on Lot J (approved 6 May 2025)
- SSD-80264236 for a warehousing and distribution centre on Lot K (approved 11 December 2025)
- SSD-85510213 for a warehousing and distribution centre on Lot E and minor amendments to the concept developments on lot A, B, C, E, G, J, and M (under assessment)

This development application (SSD-96107226) relates to a warehousing and distribution centre on Lot O

Modification of SSD-10479

The proposed modifications to the Concept Master Plan under SSD-10479 are:

- Changes to the site ingress and egress for Lot O under the Concept Master Plan
- Changes to the building footprint and general arrangement for Lot O under the Concept Master Plan

These changes are required in order to deliver the specific operational needs of the warehouse and distribution centre for Lot O and to achieve the best possible performance of the facility in terms of local amenity, safety and acoustics.

EXECUTIVE SUMMARY

Australian Bushfire Protection Planners Pty Limited has been commissioned by *Stockland Fife Kemps Creek Pty Limited* to prepare a report to provide advice on the bushfire protection measures required for the construction and operation of a warehouse and distribution centre on proposed Lot O within the Kemps Creek Industrial Estate, No. 106 - 228 Aldington Road, Kemps Creek, within the Penrith City Council Local Government Area (LGA).

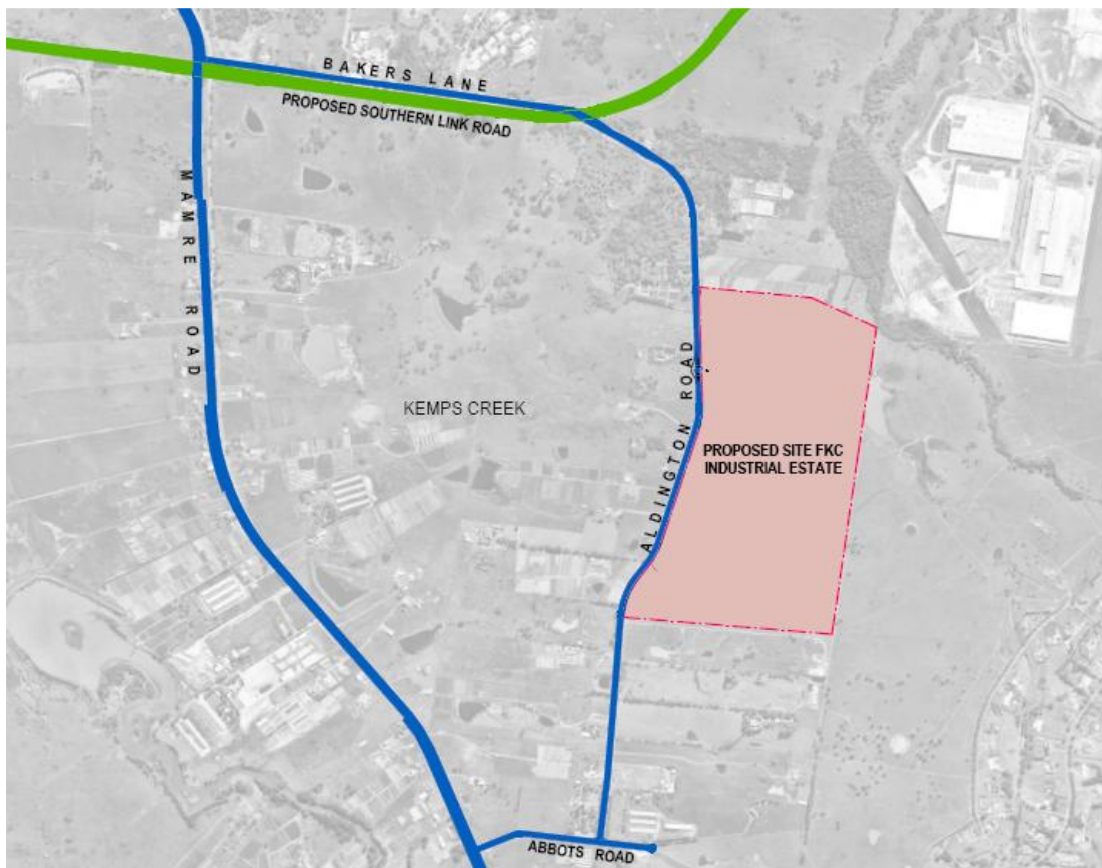
The Kemps Creek Industrial Estate is zoned for IN1 – Industrial uses and is adjoined by vacant IN1 zoned land.

A small area of RE2 zoned land occupies the northeast corner of the Estate, extending to the east across the adjoining land.

The Estate has approximately 1250m of direct frontage to Aldington Road with a proposed signalised intersection providing vehicular access via Aldington Road to the proposed Southern Link Road.

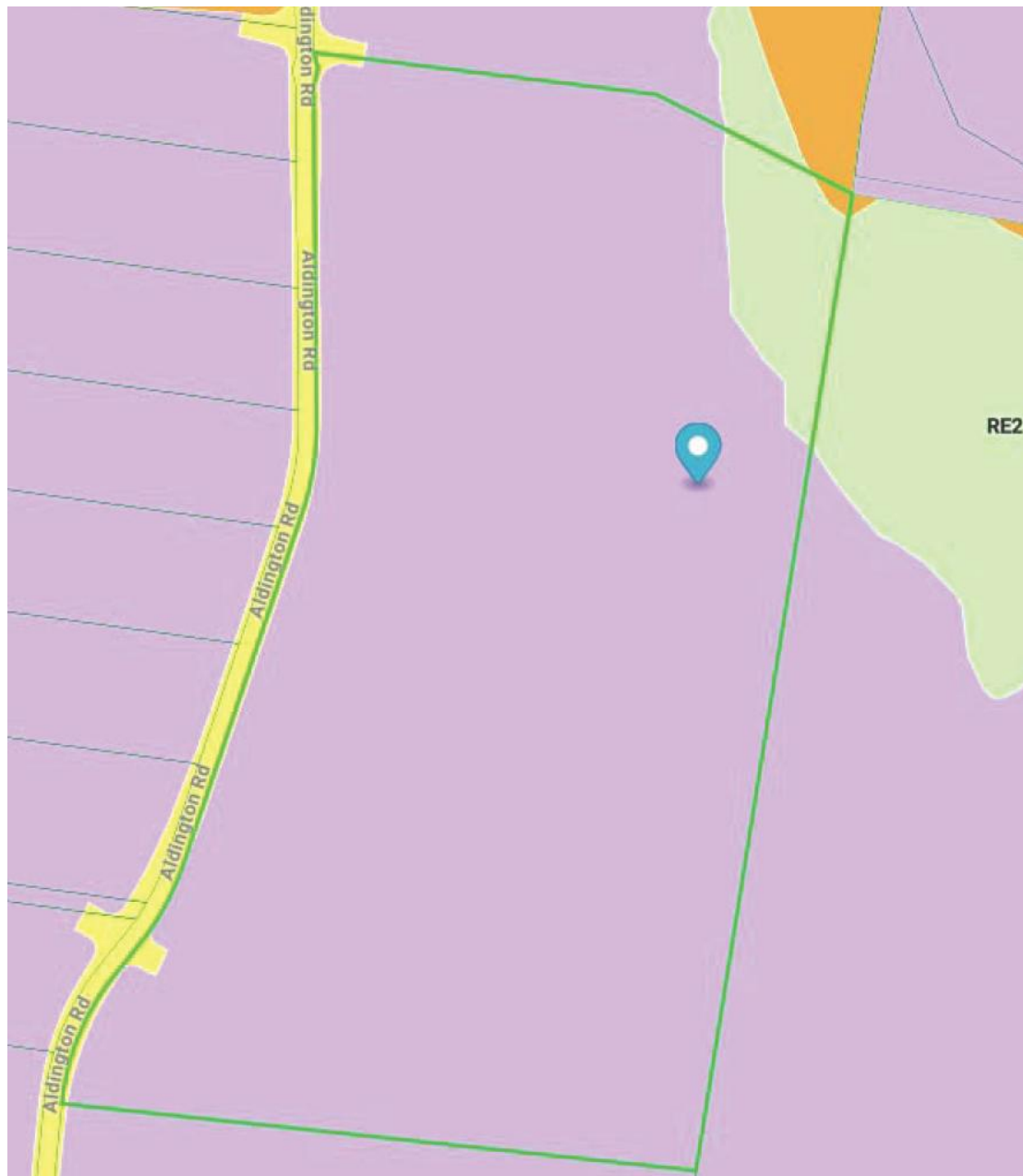
The Estate is mapped as containing the buffer zone to bushfire prone vegetation on the land to the east. This affectation impacts Lot O.

Figure 1 – Location of the Kemps Creek Industrial Estate.



Lot O forms part of the Mamre Road Precinct and is zoned for IN1 – General Industrial uses as defined within Chapter 2 of State Environmental Planning Policy (Industry and Employment).

Figure 2 – Landuse Zoning Map.



The Penrith Council Bushfire Prone Land Map indicates that the site contains the buffer zone to the Category 2 Bushfire Prone Vegetation on the adjoining lands.

Figure 3 – Extract from Penrith Bushfire Prone Land Map showing Category 3 Bushfire Prone Vegetation on the adjoining land to the east.



A review of the Bushfire Prone Land Map against the actual vegetation on the adjoining land confirms that the mapped Category 3 Bushfire Prone Vegetation consists of grassland vegetation, which is grazed.

However, due to the development site being located within a bushfire prone area the development is triggered by the Bushfire Prone Land Map and Section 4.14 of the *Environmental Planning & Assessment Act 1979* applies to the construction of the Warehouse and Distribution Centre.

Section 4.14 of the *Environmental Planning and Assessment Act* requires a Consent Authority, when considering development within a bushfire prone area, to be satisfied that the development conforms with the specifications and requirements of *Planning for Bushfire Protection 2019*.

Planning for Bushfire Protection 2019 does not identify specific deemed-to-satisfy protection measures for buildings of Class 5 to 10 of the Building Code of Australia. The document does provide the following advice for these classes of buildings:

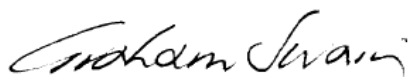
“The NCC does not provide for any bushfire specific performance requirements for these particular classes of buildings. As such A.S. 3959 and the NASH Standard are not considered as a set of Deemed to Satisfy provisions, however compliance with A.S. 3959 and NASH must be considered when meeting the aim and objectives of Planning for Bushfire Protection 2019

The objectives of *Planning for Bushfire Protection 2019* are:

- (i) Afford occupants of any building adequate protection from exposure to a bushfire;
- (ii) Provide for a defensible space to be located around buildings;
- (iii) Provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings;
- (iv) Ensure that safe operational access and egress for emergency service personnel and residents is available;
- (v) Provide for ongoing management and maintenance of bushfire protection measures; and
- (vi) Ensure that utility services are adequate to meet the needs of firefighters.

The Key Issues of the Planning Secretary's Environmental Assessment Requirements (SSD – 96107226) require that a bushfire assessment report be prepared that addresses the aims and objectives of *Planning for Bushfire Protection 2019* and the bushfire management strategies adopted for SSD – 10479.

This Bushfire Protection Assessment undertakes an assessment of the bushfire protection measures required to address bushfire risk to the Warehouse and Distribution Centre on Lot O and examines the adequacy of the setbacks [defensible spaces] to the building; fire-fighting access and provision of fire-fighting water supplies, fuel management protocols and other matters considered necessary to mitigate any potential bushfire threat to persons, property and the environment and to satisfy the requirements of *Planning for Bushfire Protection 2019* and the bushfire management strategies adopted for SSD – 10479.



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

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SECTION 1

INTRODUCTION

1.1 Aim of this Assessment.

The aim of this Bushfire Protection Assessment is to address the requirements of the Planning Secretary's Environmental Assessment Requirements and the aim & objectives of *Planning for Bushfire Protection 2019* including:

- Determine the formation of the vegetation within 140 metres of the development site, in accordance with the vegetation classification system contained in Appendix 1 of *Planning for Bushfire Protection 2019*;
- Undertake an assessment to determine the effective slope of the land on and surrounding the development site;
- Determine the Fire Danger Index [FDI] for the site;
- Undertake an assessment to determine bushfire protection strategies for the proposed development, including the bushfire protection measures required to be implemented in the design and construction of the Canopies and the requisite bushfire protection measures required to address the safety of the staff and shoppers.
- Prepare a report that addresses the following matters:
 - (i) The provision of building setbacks (Asset Protection Zones) 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 - 1979 (EPA Act)***

Planning and development within NSW is regulated by the *Environmental Planning & Assessment Act, 1997* (EPA Act). In relation to bushfire protection planning for retail/commercial development in bushfire prone areas in NSW, Section 4.1.4 of the EPA Act applies and requires a consent authority to be satisfied that the proposed development conforms to the specifications and requirements of *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.

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.

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 Development Proposal.

This Bushfire Protection Assessment has been prepared for the construction and operation of a temperature controlled Warehouse and Distribution Centre on Lot O in the Kemps Creek Industrial Estate, No. 106 - 228 Aldington Road, Kemps Creek and the modification (in part) of the approved Concept Master Plan for Kemps Creek Industrial Estate (SSD-10479) in order to accommodate the proposed Warehouse and Distribution Centre on Lot O.

1 MASTER PLAN 1:2000

[illegible]

1.4 Documentation Reviewed.

The following documents were reviewed in the preparation of this assessment

- Lot O Architectural Plans prepared by Reid Campbell Architects;
- Secretary's Environmental Assessment Requirements (SEARs) – SDD-96107226 – dated 22 October 2025;
- The Biodiversity Report undertaken by Ecological Australia;
- *Planning for Bushfire Protection 2019* prepared by the NSW Rural Fire Service/Planning N.S.W;
- Australian Standard AS3959 - 2018 *Construction of Buildings in Bushfire Prone Areas*;
- *Rural Fires Regulation 2022*;
- Penrith City Council *Certified Bushfire Prone Land Map*;
- *Planning for Bushfire Protection 2019* prepared by the NSW Rural Fire Service.

1.5 Site Inspection.

Graham Swain of *Australian Bushfire Protection Planners Pty. Limited* inspected the land occupied by the Estate and adjoining land on the 21st August 2022 to assess the topography, slopes, vegetation classification and land use within and adjoining the development site.

An assessment of the extent of bushfire prone vegetation and the accuracy of the Penrith Bushfire Prone Land Map was also undertaken.

A desk-top review of this information was undertaken prior to the preparation of this report.

SECTION 2

DESCRIPTION OF DEVELOPMENT SITE

2.1 Location & Description.

The Kemps Creek Industrial Estate occupies Lot 200 in DP 1285691, No. 106 - 228 Aldington Road, Kemps Creek.

The land to the north of the Estate contain Hot Houses. The land to the south of the Estate contains the BAPS Hindu complex.

The property to the east is vacant land used for grazing whilst the land to the west of Aldington Road contains rural residential development.

Figure 6 – Kemps Creek Industrial Estate Location Plan.



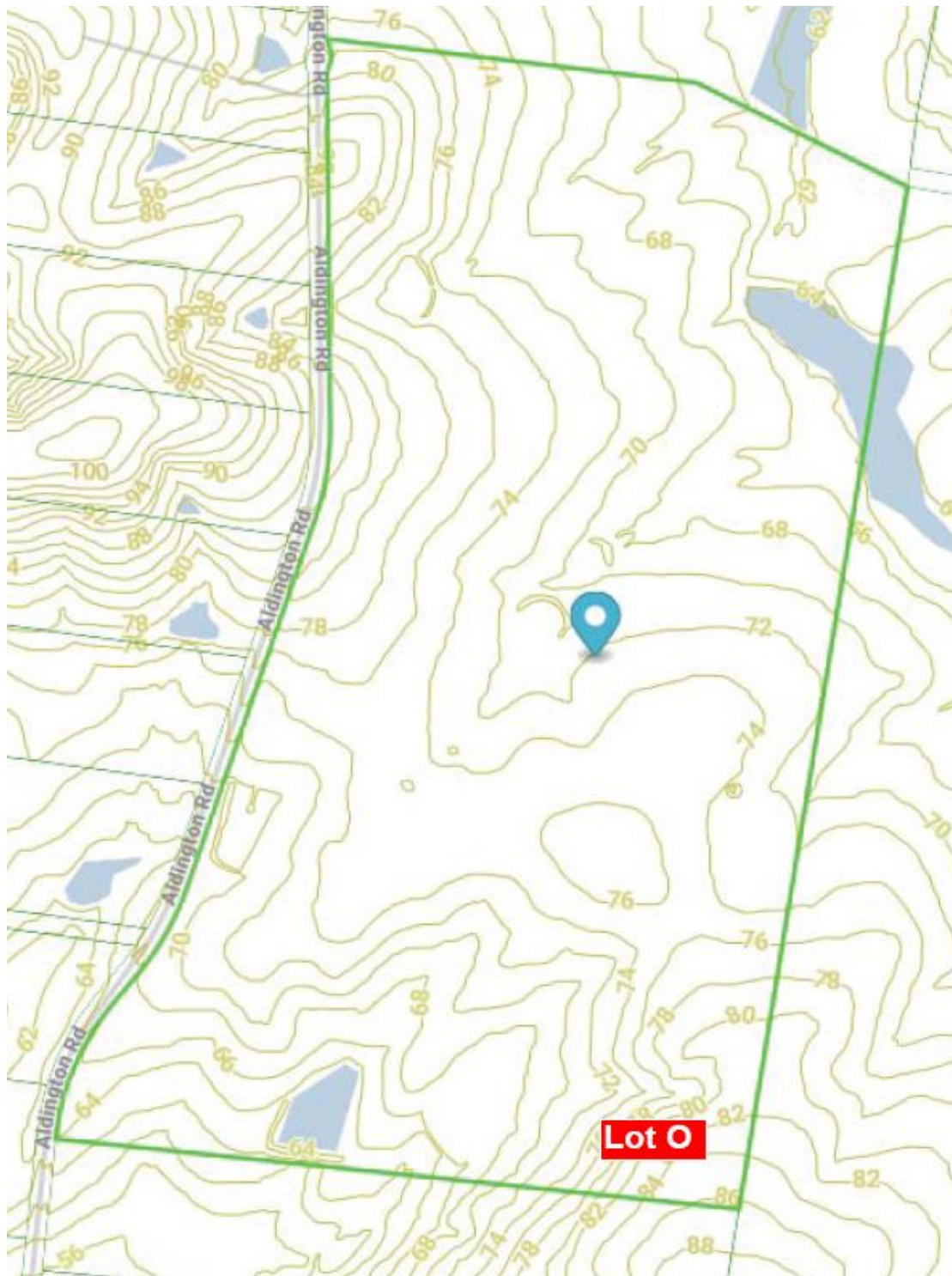
Figure 7 – Aerial Photograph of Lot 200 in DP 1285691 and adjoining landuse.



2.2 Topography.

The landform within the Estate is undulating, generally sloping to the northeast, falling towards Ropes Creek. The land to the east of Lot O falls to the northeast at 0 – 5 degrees.

Figure 8 – Topographic Map showing the location of the Industrial Estate outlined in Blue.



2.3 Vegetation Communities.

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 on the land within the Estate has been removed as part of the site earthworks and is not recorded as bushfire prone vegetation.

The land to the east of Lot O is zoned IN1 – Industrial and contains grassland vegetation which will remain a hazard to Lot O, pending development.

The timing of the industrial development on the land to the east of Lot O is unknown and therefore this report examines the bushfire risk to the proposed building based on the grassland vegetation on the land to the east.

2.4 Significant Environmental Features within Lot O.

The land within Lot O does not contain significant environmental features such as Koala Habitat; Wetlands or Littoral Rainforests mapped under Chapter 2 of SEPP (Resilience and Hazards) 2021; land slip areas or National Parks Estate; areas of geological interest or steep lands [>18 degrees].

2.5 Known Threatened Species, Populations, Endangered Ecological Communities or Critical Habitat on the land within Lot O.

There are no known threatened species, populations, endangered ecological communities or critical habitat within Lot O.

2.6 Details of Aboriginal/European Heritage within Lot O.

There are no known Aboriginal sites, relics or European heritage within Lot O.

SECTION 3

BUSHFIRE PROTECTION ASSESSMENT

3.1 Asset Protection Zones (Defendable Spaces).

The Penrith Bushfire Prone Land Map records the land to the east of Lot O as containing Category 3 Bushfire Prone Vegetation.

Defendable Spaces/Asset Protection Zones [APZs] have been assessed for the proposed Warehouse and Distribution Centre on Lot O in accordance with *Planning for Bushfire Protection 2019* and Australian Standard A.S. 3959 – 2018 (using effective slope and predominant vegetation communities) and the bushfire management strategies adopted for SSD – 10479.

The assessment is based on the predominant vegetation on the adjoining land to the east being grassland on land with a gradient of 0 – 5 degrees downslope.

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 Warehouse and Distribution Centre, from the unmanaged grassland vegetation on the land to the east, a minimum defendable space width of 9.0 metres is required.

The closest part of the proposed Warehouse and Distribution Centre is more than 25.00 metres from the landscape screening along the eastern boundary of Lot O. The Office is located more 30.00 metres from the landscape screening, therefore exceeding the minimum 9 metres required to satisfy the NSW Rural Fire Service's requirement that the building is not exposed to flame contact.

Refer to Figure 9 – Plan of approved Defendable Spaces to the Master Plan on Page 20 (SSD 10479).

Figure 10 on Page 21 provides a copy of the Lot O Site Plan showing the Defendable Space from the landscape screening along the eastern boundary of Lot O.



Figure 9 – Plan of approved Defendable Spaces to Master Plan – SSD 10479.

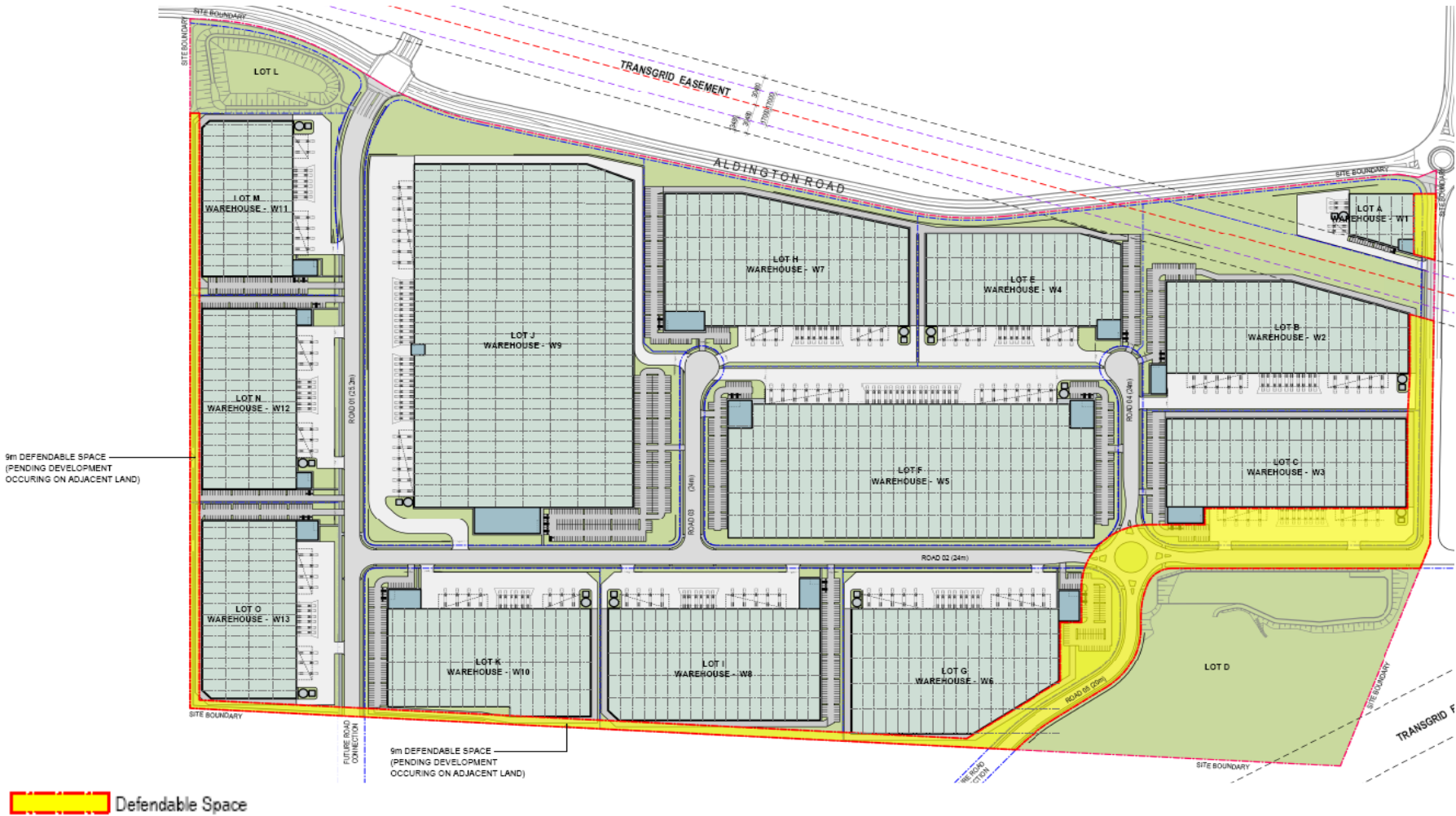
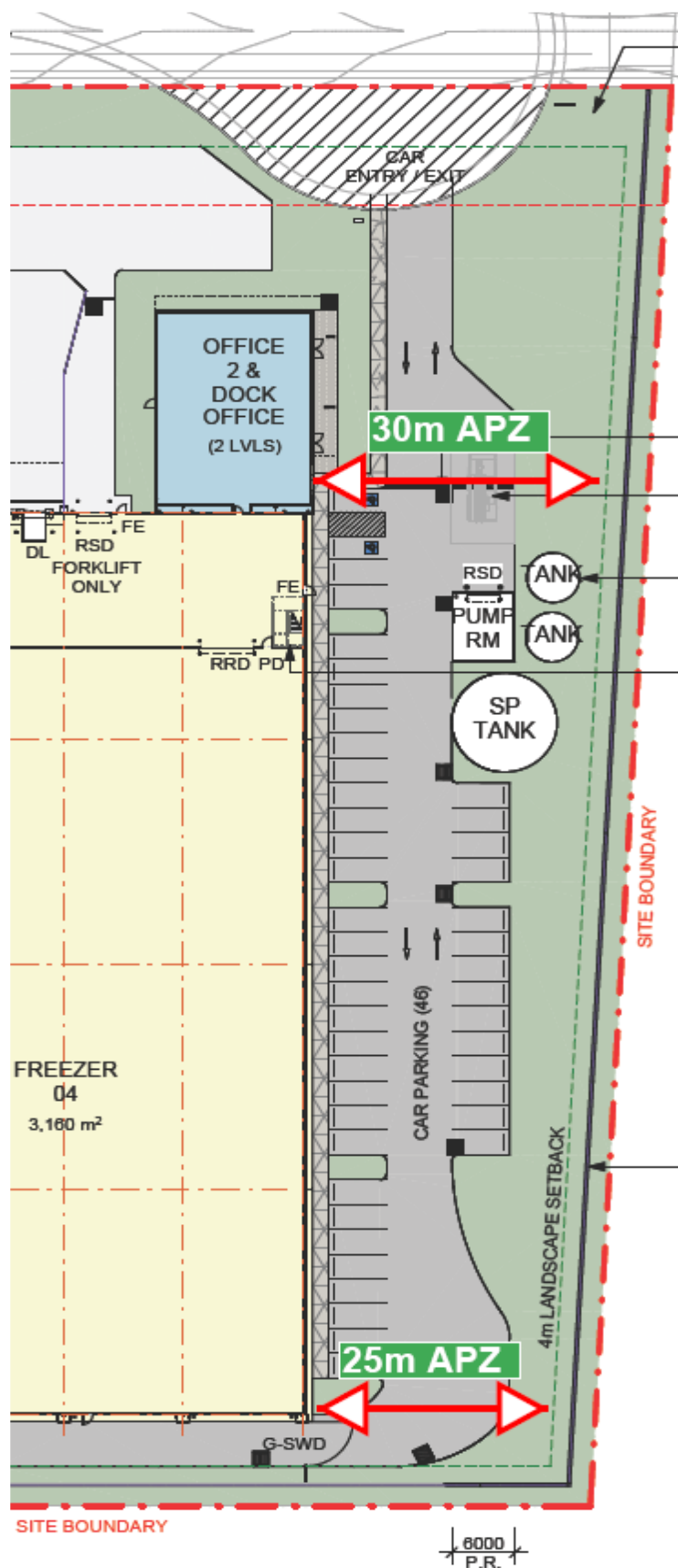


Figure 10 – Plan of Asset Protection Zone/Defendable Space to the Lot O Warehouse and Distribution Centre.



3.2 Construction Standards to the Warehouse and Distribution Centre on Lot O.

The width of the Asset Protection Zone (Defendable Space) between the Warehouse and Distribution Centre and the grassland vegetation on the land to the east of Lot O is more than 25.00 metres.

Table A1.12.5 of *Planning for Bushfire Protection 2019* determines that for a 25.00 metre wide Asset Protection Zone (Defendable Space) to the grassland vegetation, on a downslope gradient of 0-5 degrees, the construction standard to the eastern elevation of the Warehouse and Distribution Centre building is BAL 12.5, in accordance with A.S 3959 – 2018 – ‘*Construction of Buildings in Bushfire Prone Areas*’.

The width of the Asset Protection Zone (Defendable Space) between the Office and the grassland vegetation on the land to the east of Lot O is more than 30.00 metres.

Table A1.12.5 of *Planning for Bushfire Protection 2019* determines that for a 30.00 metre wide Asset Protection Zone (Defendable Space) to the grassland vegetation, on a downslope gradient of 0-5 degrees, the construction standard to the eastern elevation of the Office building is BAL 12.5, in accordance with A.S 3959 – 2018 – ‘*Construction of Buildings in Bushfire Prone Areas*’.

The eastern wall of the Warehouse and Distribution Centre and the walls and roof of the Office building shall be constructed to comply with BAL 12.5 construction in accordance with A.S 3959 – 2018 – ‘*Construction of Buildings in Bushfire Prone Areas*’.

The roof of the Warehouse and Distribution Centre shall be constructed to BAL 12.5 for a length of 50 metres, measured from the Landscape Zone.

Note:

Should the grassland vegetation on the land to the east of the site be removed prior to the construction of the Warehouse and Distribution Centre building on Lot O, the requirement to apply bushfire construction standards to the building will be removed.

3.3 Access Standards for Firefighting Operations.

The proposed internal roads to the complex on Lot O will be constructed to provide access for heavy rigid and articulated vehicles.

This internal road network will therefore provide suitable access for fire-fighting appliances. A perimeter fire-fighting access road is provided between the bushfire hazard on the land to the east and the Warehouse and Distribution Centre in accordance with the management strategies adopted for SSD 10479.



3.4 Water Supplies for Firefighting Operations.

The fire-fighting water supply to the proposed Warehouse and Distribution Centre on Lot O shall comply with the Building Code of Australia [BCA] and Australian Standard A.S. 2419.1 – 2021.

3.5 Emergency Management for Fire Protection / Evacuation.

Due to the low-level risk of a fire occurring in the grassland vegetation land to the east a Bushfire Emergency Evacuation Plan (BEEP) is not required.

SECTION 4

CONCLUSION

The Development Application seeks approval for the construction of a temperature-controlled Warehouse and Distribution Centre on Lot O, Kemps Creek Industrial Estate, No. 200 Aldington Road, Kemps Creek.

The Penrith Bushfire Prone Land Map records Category 3 Bushfire Prone Vegetation on the adjoining land to the east with the buffer zone to this vegetation extending onto the development site.

The bushfire risk to the Warehouse and Distribution Centre will remain until the adjoining land to the east is developed.

This report examines the bushfire protection measures required to address the requirements of the Planning Secretary's Environmental Assessment Requirements and identifies that the available width of Asset Protection Zone (Defendable Space) to the Warehouse (25m) and Office (30m) lowers the radiant heat load to less than 12.5kW/m² therefore removing flame contact with the building.

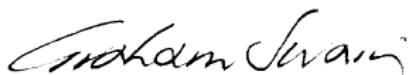
Bushfire construction standard BAL 12.5 has been recommended to the roof and walls of the Office, the eastern elevation of the Warehouse building and the roof of the Warehouse building to a length of 50 metres, measured from the landscape zone.

The remaining elevations of the Warehouse building are not required to be constructed to comply with BAL standards.

These recommendations comply with the bushfire management strategies adopted for SDD 10479.

Fire-fighting access is provided between the hazard and the proposed buildings, in accordance with the bushfire management strategies adopted for SDD 10479.

Should the bushfire hazard on the land to the east be removed prior to the construction of the Warehouse and Distribution Centre on Lot O, the recommended bushfire protection measures will not be required.



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 2022*;
- NSW Rural Fire Service – *Guideline for Bushfire Prone Land Mapping 2015*;
- *Bushfire Environmental Assessment Code 2021*;
- Building Code of Australia;
- Australian Standard A.S. 3959-2018 “*Construction of Buildings in Bushfire Prone Areas*”;
- *Penrith Bushfire Prone Land Map*.