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Contact: Firefighter Nathan Everett

5 November 2018

Department of Planning and Environment
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Dear Ms Matthews

Notice of Exhibition
Snack Brands Warehouse and Distribution Facility (SSD 9429)
585-649 Mamre Road, Orchard Hills (Penrith LGA)

I refer to the submission of the Notice of Exhibition (the Notice) dated 28 September 2018 for the above development to Fire + Rescue NSW (FRNSW) for review and comment. It is understood that the Notice is in regard to the construction and operation of a high-bay warehouse for the purpose of storage and distribution of pre-packaged snack food items. An Environmental Impact Statement report (the Report) including a number of accompanying appendices has been prepared in support of the application.

Details of the submitted report are:

- Environmental Impact Statement, prepared by Willowtree Planning Pty Ltd, report title: Proposed Warehouse and Distribution Facility, dated 05 September 2018, Version 4, report reference Snack Brands_EIS

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.

- Appendix 17 – Building Code of Australia report 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 is proposed that a portion of the warehouse facility be used for automated high-bay racking. Such systems represent unique challenges to firefighting operations due to the height and density of stored goods, and limited access. It is noted that within Appendix 17 that in-rack sprinklers would be required.
- It is noted that the storage of dangerous goods is below the threshold that would trigger the *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*.

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

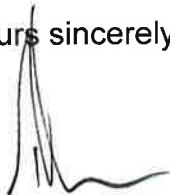
- Consideration be given as to whether the quantity of materials stored in the warehouse would be deemed a special hazard in regard to parts E1.10 and E2.3 of the NCC.
- Consultation with FRNSW be undertaken by way of the Fire Engineering Brief Questionnaire (FEBQ) process prior to the issue of the relevant construction certificate.
- Details of the proposed automated racking equipment be included in the above FEBQ/Fire Engineering Report (FER). This should include the operational functions of the equipment with reference to the automated electrical shut down, housing of the picking cranes, and isolation of the electrical supply to each aisle.
- Consideration be given to FRNSW access and intervention within the warehouse, particularly at heights above ground level or at heights beyond the reach of the equipment carried by the FRNSW for internal intervention. Suitable provisions should be made due to the nature in which the materials are stored within the automated portion pursuant to part E1.10 of the NCC such that there is access provided to all parts of the racking system in compliance with the Work Health and Safety provisions. FRNSW does not consider access via roof hatches etc. to be adequate to enable sufficient access to all areas of an automated system.



- 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 BFS18/2762. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely,



Chief Superintendent David Lewis
Fire Safety
Community Safety Directorate



