



File Ref. No: FRN18/1814 BFS19/1853 (8000007715)
TRIM Doc. No: D19/43447
Contact: Senior Firefighter Arthur Brown

21 June 2019

The Department of Planning & Environment
C/- Kelly McNicol
GPO Box 39
SYDNEY NSW 2001

Dear Ms McNicol

**Exhibition of Environmental Impact Statement (SSD 9522)
Kemps Creek Warehouse, Logistics and Industrial Facilities Hub
657-769 Mamre Road Kemps Creek
Lot 34 DP 1118173, Lot X DP 421633, Lot 1 DP 1018318,
Lot Y DP 421633 & Lot 22 DP 258414**

I refer to the above proposed development's Environmental Impact Statement (EIS) which is currently on public exhibition. Fire + Rescue NSW (FRNSW) have reviewed aspects of the EIS and the following comments and recommendations are submitted to the NSW Department of Planning & Environment (the Department) for consideration.

We note that Section 4.2.9 of the EIS addresses State Environmental Planning Policies (SEPP) that may be applicable to the proposed estate development. Reference is made therein to SEPP 33 – 'Hazardous and Offensive Development' and the EIS states that the current proposal is not considered to be potentially hazardous or potentially offensive development.

The EIS Appendix 13 also states that should an operator seek to occupy premises within the development for purposes that would be classified as potentially hazardous or offensive, a review of the application of SEPP 33 should be conducted and, where required, a Preliminary Hazard Analysis (PHA) would be undertaken, it would then be identified that SEPP 33 applies to that specific warehouse.

We also note that there has been no National Construction Code (NCC) assessment undertaken nor any proposed Fire Safety Strategy. FRNSW experiences with large isolated buildings has been that they neglect to look at the potential applicability of Clauses E1.10 and E2.3 of Volume One of the NCC (N.b. we understand that potential tenants for the warehouses are unknown at this time as are hazards associated with future tenancy operations).



Recommendations

The following recommendations are submitted to the Department for consideration:

1. That each proposed warehouse building of the subject development is served by required fire systems that are independent of one another.
2. That any development application relating to one of the developments speculative warehouses that is subject of the provisions of Part 2 of SEPP 33 and is subsequently approved; a condition be attached to the relevant instrument of consent requiring a fire safety study (FSS) to be undertaken in accordance with the requirements of Hazardous Industry Planning Advisory Paper (HIPAP) No.2. In addition, that any FSS be prescribed to meet FRNSW requirements or approval (as currently applicable under Appendices 1 – 3 [inclusive] of the January 2011 edition of HIPAP No.12).
3. That the certifying authority be required to make specific assessment and determination as to the applicability of Clauses E1.10 and E2.3 of Volume One of the relevant National Construction Code when considering future applications for construction certificates pertaining to fit out of the subject warehouses by prospective warehouse tenants.
4. Where the future applicability of either Clause E1.10 or E2.3 of Volume One of the relevant National Construction Code is affirmed, that the certifier be required to seek FRNSW concurrence of any additional provisions that are proposed to be implemented to satisfy the requirements of either Clause E1.10 or E2.3.
5. Road widths and turning circles, bends and roundabouts, are provided compliant with FRNSW policy No. 4 – Guidelines for Emergency Vehicle Access (link provided).
http://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/vehicle_access.pdf
6. Pursuant to Clause 142 of the local Government (General) Regulation 2005 (the Regulation), and to ensure that a ready supply of water is available to first responders for the purpose of extinguishing fires, that the development's water supply main incorporates fire hydrants installed in accordance with the requirements of the Regulation.

For further information please contact Arthur Brown of the Fire Safety Command Liaison Unit, referencing FRNSW file number BFS19/1853 (7715). Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely



Superintendent Michael Henly
Manager
Fire Safety Infrastructure Unit
Fire & Rescue NSW