

File ref. no: BFS18/3403 (5535)  
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Contact: Qualified Firefighter Nathan Everett

05 December 2018

Department of Planning and Environment  
C/- Bruce Zhang  
GPO Box 39  
Sydney NSW 2001

E: Bruce.Zhang@planning.nsw.gov.au

Dear Mr Zhang,

**Notification of Exhibition  
Chester Hill Resource Recovery Facility (MOD 3)  
191 Miller Road, Chester Hill (Canterbury-Bankstown LGA)**

I refer to the submission of the Environmental Assessment report (the Report) dated 12 November 2018 for the above development to Fire + Rescue NSW (FRNSW) for review and comment. The Report has been prepared in support of a modification application to upgrade the Chester Hill Resource Recovery Facility.

Details of the submitted report are:

- Environmental Assessment – Modification for the upgrade of the Chester Hill Resource Recovery Facility (MP\_0052), prepared by Chris Wilson of CW Strategic Planning Services for Building Recycling Operations Pty Ltd, dated 12 November 2018, Version 1.3

It has been the experience of FRNSW that waste recycling facilities pose unique challenges to firefighters when responding to and managing an incident. Factors such as high and potentially hazardous 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 the Report.

- It is understood that the main works to be completed as part of the modification include:
  - Reconfiguration of the existing layout.
  - Enclosing processing activities within a new structure.
  - Construction of hardstand areas.
  - Improvements to the stormwater and wastewater systems.
  - Increases to processing limits.
- It is noted that a preliminary Fire Safety Study (FSS) has been prepared and included within the Report as *Appendix L – Preliminary Fire Safety Study*.
- It is noted that a SEPP 33 assessment has been undertaken and the site has not been deemed to be potentially hazardous or offensive. While a Preliminary Hazards Analysis (PHA) is not required, it is understood one will be completed as part of the preparation of the FSS.

The following recommendations are provided following a review of the Report.

- That consideration be given to advice and recommendations given within FRNSW's fire safety guideline - *Fire Safety in Waste Facilities*. This guideline is available on the FRNSW website as a public consultation document.
- That the Department of Planning & Environment include as a condition of consent that the FSS is completed to the satisfaction of FRNSW.
- That further information regarding the types of waste and corresponding maximum storage volumes be included in the PHA and considered when assessing a 'worst credible fire' scenario as part of the FSS.
- That due consideration be given to clauses E1.10 and E2.3 of the National Construction Code in preparation of the FSS.
- That consultation with FRNSW be undertaken throughout the development of the FSS.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS18/3403. Please ensure that all correspondence in relation to this matter is submitted electronically to [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael Henly', with a stylized flourish at the end.

Superintendent Michael Henly  
Manager Infrastructure Liaison Unit  
Community Safety Directorate