



NSW RURAL FIRE SERVICE

Department of Planning and Environment (Sydney Offices)
GPO Box 39
Sydney NSW 2001

Your reference: SSD-22191322
Our reference: DA20210530002237-EIS & DA
Exhibition-1

ATTENTION: Deana Burn

Date: Tuesday 31 August 2021

Dear Sir/Madam,

**State Significant Development - Warehouse or Distribution Centre
Request for comments - exhibited Environmental Impact Statement (EIS)
2 Aldington Road Kempas Creek NSW 2178, 26//DP1269741**

Reference is made to correspondence dated 04/08/2021 seeking comments regarding the Environmental Impact Statement (EIS) currently being exhibited, for the above State Significant Development in accordance with the *Environmental Planning and Assessment Act 1979*.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the EIS and provides the following comments;

1. To the satisfaction of the hazard division of the Department of Planning, Industry and Environment (DPIE), the Fire Safety Study (FSS) must be updated and prepared consistently with the Hazardous Industry Planning and Assessment Papers (HIPAPs) detailing fire prevention and mitigation measures for all credible fire hazards, including grass and bush fires.
2. A Fire Management Plan (FMP) must be prepared in consultation with the NSW RFS Cumberland Fire Control Centre. The FMP must include:
 - 24-hour emergency contact details including alternative telephone contact;
 - Site infrastructure plan;
 - Fire fighting water supply plan;
 - Site access and internal road plan;
 - Implementation of Asset Protection Zones (APZ) and their continued maintenance;
 - Location of hazards (Physical, Chemical and Electrical) that will impact on fire fighting operations and procedures to manage identified hazards during fire fighting operations; and
 - Any such additional matters as required by the Cumberland Fire Control Centre (e.g. FMP review and updates).
3. A Bush Fire Emergency Management and Evacuation Plan must be prepared consistently with the NSW RFS document: *A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan* and must include planning for the early relocation of occupants.

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4. From the start of building works and in perpetuity, the entire subject development site must be managed as an inner protection area (IPA) in accordance with the requirements of Appendix 4 of *Planning for Bush Fire Protection 2019*. When establishing and maintaining an IPA, the following requirements apply:

- Tree canopy cover be less than 15% at maturity;
- Trees at maturity are not touching or overhang the building;
- Lower limbs are removed up to a height of 2m above the ground;
- Tree canopies are separated by 2 to 5m;
- Preference is given to smooth-barked and evergreen trees;
- Large discontinuities or gaps in vegetation are provided to slow down or break the progress of fire towards buildings;
- Shrubs are not located under trees;
- Shrubs do not form more than 10% of ground cover;
- Clumps of shrubs are separated from exposed windows and doors by a distance of at least twice the height of the vegetation.
- Grass to be kept mown (as a guide grass should be kept to no more than 100mm in height);
- Leaves and vegetation debris are removed; and
- NSW Rural Fire Service's document *Standards for asset protection zones*.

5. Landscaping within the entire subject development site must comply with Appendix 4 of *Planning for Bush Fire Protection 2019*. In this regard, the following principles are to be incorporated:

- A minimum 1 metre wide area, suitable for pedestrian traffic, must be provided around the immediate curtilage of the building;
- Planting is limited in the immediate vicinity of the building;
- Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters);
- Landscape species are chosen to ensure tree canopy cover is less than 15% (IPA) at maturity and trees do no touch or overhang buildings;
- Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies;
- Use smooth bark species of trees species which generally do not spread fire up the bark into the crown;
- Avoid planting of deciduous species that may increase fuel at surface/ ground level (i.e. leaf litter);
- Avoid climbing species to walls and pergolas;
- Locate combustible materials such as woodchips/mulch, flammable fuel stores away from the building;
- Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from the building; and
- Low flammability vegetation species are used.

6. New construction must comply with the corresponding Bushfire Attack Level (BAL) as shown in Figure 3 of the bush fire report prepared Blackash Bushfire Consulting, dated 24 June 2021. The BAL must comply with corresponding sections of the Australian Standard AS3959-2018 *Construction of buildings in bush fire-prone areas* or NASH Standard (1.7.14 updated) *National Standard Steel Framed Construction in Bushfire Areas – 2014* as appropriate, and Section 7.5 of *Planning for Bush Fire Protection 2019*.

7. The remainder of the building not denoted with a BAL in Figure 7 of the submitted bush fire report must comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2018 *Construction of buildings in bush fire-prone areas* or NASH Standard (1.7.14 updated) *National Standard Steel Framed Construction in Bushfire Areas – 2014* as appropriate, and Section 7.5 of *Planning for Bush Fire Protection 2019*.

8. Any new Class 10b structures as defined per the *National Construction Code* must be non-combustible.

9. The provision of water, electricity and gas must comply with Table 7.4a of *Planning for Bush Fire Protection 2019*.

For any queries regarding this correspondence, please contact Simon Derevnin on 1300 NSW RFS.

Yours sincerely,

Kalpana Varghese

**Supervisor Development Assessment & Plan
Built & Natural Environment**