

**From:** Brendan.M Hurley <Brendan.M.Hurley@fire.nsw.gov.au>  
**Sent:** Tuesday, 8 September 2020 1:11 PM  
**To:** Ellen Luu  
**Cc:** Fire Safety  
**Subject:** Notice of Exhibition – Luddenham Resource Recovery Facility (SSD-10446).  
BFS20/2311

**Notice of Exhibition – Luddenham Resource Recovery Facility (SSD-10446)**

Dear Ellen,

Fire & Rescue NSW (FRNSW) acknowledge the receipt of your email on the 27<sup>th</sup> July 2020, requesting input into the preparation of the Environmental Impact Statement (EIS) for the Luddenham Resource Recovery Facility (SSD-10446).

FRNSW is satisfied with the documentation provided and reaffirms previous recommendations provided in correspondence dated 14<sup>th</sup> April 2020. The recommendations are provided below.

It is understood that Coombes Property Group and KLF Holdings Pty Ltd (the proponent) is proposing to develop and operate Luddenham Resource Recovery Facility (the Proposal) on 275 Adams Road, Luddenham NSW (Lot 3, DP 623799) (the subject property). The resource recovery facility would accept construction and demolition waste, with some commercial and industrial waste, including tyres. The RRC would also accept ferrous and non-ferrous materials, timber, paper and cardboard, masonry (concrete, bricks, tiles), asphalts, soil, fireboards, sheeting, gyprock, fines and plastics, with a material processing capacity of up to 600,000 tonnes per annum (tpa).

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.

FRNSW submit the following general comments and recommendations for consideration:

- FRNSW understands that a SEPP 33 assessment has been undertaken as part of the development of the Environmental Impact Statement (EIS).
- It is recommended that advice and considerations contained within FRNSW's Fire Safety Guideline – *Fire safety in waste facilities* be addressed. Advice and recommendations contained within the guideline have been developed to enable FRNSW to adequately manage an incident at such facilities.
- It is recommended that advice and considerations contained within FRNSW's Fire Safety Guideline – *Emergency Vehicle Access* be addressed. This is required such that FRNSW are able to safely access all parts of the site where an incident may occur.
- It is recommended that provisions be made for the containment of contaminated fire water run-off based on the worst credible fire scenario for the site. Any system(s) provided is to be automatic in nature and should not rely upon on-site staff or emergency services personnel to access or activate provided systems or valves in the event of fire.
- It is recommended that if the development proposes to incorporate a fire engineered solution (FES), whether a building design having a performance solution in accordance with the *National Construction Code (NCC)* or other infrastructure where building codes are not applicable, FRNSW should be engaged in the fire engineering brief (FEB) consultation process at the preliminary design phase, post approval of the development application. FRNSW also recommend that clauses E1.10 and E2.3 be addressed where a FES is required.

- It is recommended that a Condition of Consent be included that would require the fire and life safety measures for the development to be reassessed for adequacy in the event that either; significant changes are made to the site configuration, processing capacity is increased from 600,000 tpa, or there are changes to either the accepted waste streams or a significant increase in streams that are combustible in nature.
- It is recommended that the an emergency plan for the waste facility in accordance with *AS 3745–2010 Planning for emergencies in facilities* be prepared for the development. An external consultant should be engaged to provide specialist advice and services in relation fire safety planning and developing an emergency plan.

If you have any queries regarding the above please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS20/2311. 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).

Regards  
Brendan



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