Fire & Rescue NSW

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Contact: Mark Castelli

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The Department of Planning & Environment
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Dear Mr Roberts

Sydney Metro
Martin Place Station Precinct
Martin Place, Sydney (SSD17_8351)

I refer to the above development proposal's Environmental Impact Statement (EIS). Fire & Rescue NSW (FRNSW) have reviewed the EIS and the following comments and recommendations are submitted to the NSW Department of Planning & Environment (the Department) for consideration.

Comments

The artistic impressions detailed in the EIS of the indicative North Site (which include a proposed over station development tower and existing 50 Martin Place) and South Site (also incorporating an over station development tower) indicate that the various sectors of the development would present as independent buildings. In other words, irrespective of any *United Building* determination made by a certifying authority with respect to Clause A4.1 of Part A4 of the National Construction Code (NCC) an observer located at street level, including first responders, would presume the buildings to be independent structures due to either physical separation by Martin Place or their period of construction.

If the entire precinct was served by common fire systems it is FRNSW experience and judgment that there would be potential for safe and efficient management of an emergency fire incident to be compromised and delayed. The reasons for the potential hindrance to efficient fire incident management are primarily due to likely confusion with respect to quickly locating and identifying critical fire safety systems' infrastructure controls (such as hydraulic fire service boosters, fire control rooms etc) and fire system control locations relative to the various sectors of the precinct served.

For example, a fire hydrant booster positioned at the South Site and serving the entire precinct would need to be operated for a fire emergency in the North Site or other Sectors of the precinct as applicable.

Having to operate fire service system controls that might be a significant distance from the sector of the precinct (including underground sectors) involved in a fire incident has high potential to impede fire-fighting operations and jeopardise the health and safety of FRNSW personnel.

Further, fire emergencies involving extremely high buildings increases the level of risk to both the building's occupants and first responders. The increase in risk is due to fire operations becoming solely reliant on the building's fixed on-site fire system pumpsets when those operations are undertaken on storeys located above 135m. Consequently, in the event of a fire occurring on a storey located above 135 m coinciding with the failure of the building's on-site pumpsets, FRNSW personnel would be unable to effectively pressurise the fire hydrant system using our vehicle mounted appliance pumps and the building's fire booster/s. The inability of FRNSW to operate the fire hydrant system to achieve the minimum high pressures required to undertake contemporary firefighting techniques would jeorpardise the safety of FRNSW personnel engaged in offensive firefighting actions. Such firefighting actions potentially include time critical operations such as locating and rescuing trapped building occupants.

Recommendation/s

Should a fire or hazardous material incident occur, it is important that first responders are able to quickly identify critical fire system controls (such as fire service booster assemblies) and to rapidly determine which building is served by those fire systems. For reasons of operational efficacy, it is also important that resources deployed to critical fire system controls are located within reasonable proximity to the incident command centre. The following recommendations are therefore submitted for consideration. Should development consent be granted, FRNSW advocates for the Department to consider including the following recommendations as conditions attached to the relevant instrument of development consent:

1. That the various Martin Place Station Precinct sectors (such as over station development towers, underground Metro sector etc) are served by independent fire systems

2. That Fire & Rescue NSW be consulted with respect to the operational compatibility of the Precinct's proposed fire and life safety systems and their configuration at the project's preliminary and final design phases

3. That the pedestrian connection interfaces between the various sectors of the precinct (i.e. Sydney Train's Martin Place Station, the Sydney Metro's Martin Place Station and over station developments), and the sectors of the precincts themselves, are appropriately assessed by fire engineering analysis with respect to emergency occupant egress, fire and smoke compartmentation, smoke hazard management and firefighting intervention

4. In addition to Sydney Metro rolling stock, that such analysis considers the fire hazards associated with Sydney Train's rolling stock and the adequacy of fire

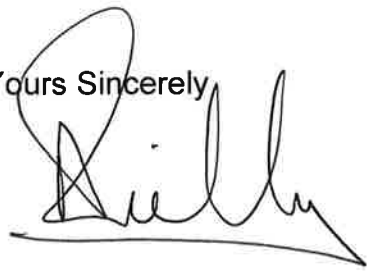
and life safety systems of the Martin Place Metro Precinct to mitigate the identified potential hazards associated with such interconnection

5. It is recommended that the preliminary design of the fire hydrant system for any over station development tower that exceeds 135 metres in effective height is specifically designed in consultation with FRNSW. In addition, that fire hydrant system's final design meets the satisfaction of FRNSW

6. That FRNSW also be listed as a stakeholder and be consulted during the design and construction of the buildings, as well as any relevant stages post construction.

For further information please contact Mark Castelli of the Fire Safety Assessment Unit, referencing FRNSW file number BFS17/1445 (798). Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours Sincerely,



Superintendent Mark Reilly AFSM CMIFireE
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