

File ref. no:BFS19/1193Doc. ref. no:D19/29770Contact:Qualified Firefighter Nathan Everett

7 May 2019

Department of Planning and Environment C/- Olivia Hirst GPO Box 39 Sydney NSW 2001

E: olivia.hirst@planning.nsw.gov.au

Dear Ms Hirst,

Notice of Exhibition Lane Cove West Data Centre (SSD 9741) 1 Sirius Road, Lane Cove (Lane Cove LGA)

I refer to the submission of the Notice of Exhibition (the Notice) dated 10 April 2019 for the above development to Fire & Rescue NSW (FRNSW) for review and comment.

It is understood that the Notice is in regard to a proposed data centre at Lane Cove West. An Environmental Impact Statement report (the Report) including accompanying appendices has been prepared in support of the application.

Details of the submitted report are:

• Environmental Impact Statement, Proposed Data Centre, prepared by Travis Lythall of Willowtree Planning, dated 09 April 2019, Version 7

It has been the experience of FRNSW that unique facilities such as data centres pose challenges to firefighters when responding to and managing an incident. Factors such as potentially high 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 relevant parts of the Report and appendices.

• It is understood that a *State Environmental Planning Policy No. 33 (Hazardous and Offensive Development)* (SEPP 33) assessment has been undertaken in

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Appendix 22 – SEPP 33 Report, and the development has not been deemed to be either hazardous or offensive.

- It is noted that it is proposed to store 510,000L of diesel (combustible liquid class C1) on site to service the back-up generators.
- It is noted that *Appendix 31 BCA Report* proposes a number of performance solutions that may have a significant impact on the ability of FRNSW to safely and effectively undertake firefighting operations and manage an incident.

The following recommendations are provided following a review of relevant parts of the Report and appendices.

- Confirmation should be provided that no flammable liquids will be stored with the diesel such that it would be treated as a class 3PGIII dangerous good in accordance with SEPP 33.
- Consultation with FRNSW be undertaken by way of the Fire Engineering Brief Questionnaire (FEBQ) process prior to the issue of the relevant construction certificate.
- Further information be provided in regard to the storage of the diesel on site, including consideration and provisions made for special problems of fighting fire in accordance with E1.10 of the National Construction Code (NCC).

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS19/1193. Please ensure that all correspondence in relation to this matter is submitted electronically to <u>firesafety@fire.nsw.gov.au</u>.

Yours sincerely,

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Superintendent Mick Henly Manager Infrastructure Liaison Unit Community Safety Directorate