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Contact: Qualified Firefighter Nathan Everett

25 October 2018

Department of Planning and Environment
C/- Bianca Thornton
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Dear Ms Thornton

**Notice of Modification Request
Genesis Waste Management Facility
1 Kangaroo Ave, Eastern Creek (Blacktown City Council)**

I refer to the submission of the Environmental Assessment report (the Report) dated 31 August 2018 for the above development to Fire + Rescue NSW (FRNSW) for review and comment. The Report has been prepared regarding the modification of the Genesis Xero Waste Facility at Eastern Creek.

Details of the submitted report are:

- Environmental Assessment – Modification of Project Approval, prepared by Allan Young of EMM Consulting for Dial-A-Dump Industries (EC) Pty Ltd, report title: Genesis Xero Waste, dated 31 August 2018, Version 2, report number J17118RP1

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 comments are provided following a review of the Report.

1. It is noted under section 5.3.7 (ii) of the Report that the development has been assessed against the requirements of State Environmental Planning Policy No. 33 - Hazardous and Offensive Development (SEPP 33) and deemed to be not hazardous or offensive. As such there is no requirement for a Preliminary Hazards Analysis (PHA) to be undertaken, and consequently no requirement for a Fire Safety Study (FSS).
2. It is stated under section 7.8.1 of the Report that *Fire Hydrants and firefighting equipment is shown as set out in the Fire Evacuation Diagrams* is located in Appendix H, however no information regarding this could be found.
3. It is noted under section 7.8.1 of the Report that while there is to be no new fundamental activities, there will be an intensification of existing activities. It is expected that this will result in an increase in waste volumes and subsequent fire loads.

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

1. That if the development proposes to incorporate a fire engineered solution (FES), whether a building design having an alternative 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.
2. While there is currently no requirement for a FSS, FRNSW may request one be undertaken at a later stage should information be provided such that it is deemed that the development poses unique challenges to the response to and management of an incident.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS18/2615. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Yours sincerely



Superintendent Mick Henly
Manager Infrastructure Liaison Unit
Community Safety Directorate