



File ref. no: BFS20/3784
Doc. ref. no: D21/17948
Contacts: Manager Infrastructure Liaison Unit

11 March 2021

Patrick Copas
Senior Environmental Assessment Officer
Department of Planning, Industry and Environment

Dear Patrick,

Thank you for your email regarding the Response to Submissions for the Macquarie Park Data Centre (SSD-10467).

FRNSW are satisfied that the Applicant's responses adequately address agency considerations at this time with the exception of FRNSW's recommendation that a condition be included within the instrument of consent requiring the Applicant to prepare and submit a Fire Safety Study (FSS) for the site. It is understood that the Applicant considers that this is not necessary given that; the SEPP 33 assessment considered the development not to be hazardous, consultation has been undertaken by way of the FRNSW's Fire Engineering Brief Questionnaire (FEBQ) process, and the storage of diesel will be to relevant Australian Standards.

In response, FRNSW submit the following:

1. A SEPP 33 assessment deeming a development not to be hazardous is not indicative of the fire and/or explosion risk profile for that development, given it has only considered that the presence of any Dangerous Goods will not have an impact outside of the subject site. Furthermore, Lithium-ion batteries (being a Class 9 Dangerous Good) and diesel (being a Class C1 combustible liquid) are not considered within SEPP 33.
2. Whilst it is understood that consultation has been undertaken by way of the FEBQ process, it is considered that there is benefit in the preparation of a FSS, given that it requires a development to undergo a rigorous site-specific hazard identification and fire risk management process that is informed by first-principles assessments and engineering analysis; whereas the FEBQ process is largely reliant on the performance requirements of the National Construction Code (NCC) being adequate to manage the fire risk. The Fire Safety Branch recommend that this approach be adopted in cases where:
 - A development poses elevated levels of fire risk due to either the nature or quantity of materials being stored;

- There are factors such as unique site constraints or processes that limit the effectiveness of conventional mitigation strategies and measures;
- There is potential for catastrophic consequences resulting from a significant fire event;
- The development has a demonstrated history of fire events and associated incidents;
- It is considered that fire risks are either outside of the scope-of or not able to be adequately managed by the provisions of the NCC; or
- There is limited capacity or capability for attending agencies to safely manage and/or mitigate an incident.

Developments containing large-scale lithium-ion battery energy storage systems are considered to fall into such categories.

3. The on-site presence of significant quantities of diesel may be considered a hazard and present a fire risk when considering a 'domino' type escalation of a fire event.

As such, FRNSW maintain the recommendation that a condition be included within the instrument of consent requiring the Applicant to prepare and submit a FSS for the site. FRNSW do not agree with the Applicant's response that "Should this requirement be imposed as a condition of consent it is requested that FRNSW's review of the study is undertaken with comments (if any) issued within 14 days of submission".

Regards,

Murray Mackne



A/SUPERINTENDENT MURRAY MACKNE
A/Manager Infrastructure Liaison
Community Safety | Fire and Rescue NSW

E: murray.mackne@fire.nsw.gov.au

T: 97427164 | M: 0477740591

1 Amarina Ave, Greenacre, NSW 2190 | Locked Mail Bag 12, Gre