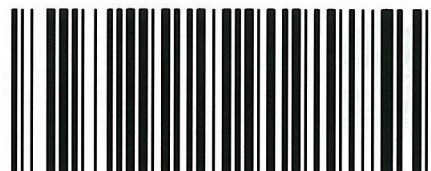




NSW RURAL FIRE SERVICE



PCU057188

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Your reference: SSD 5300 EIS
Our reference: S14/0039

26 November 2014

Department of Planning
Received
1 DEC 2014
Scanning Room

Attention: Jane Flanagan

Dear Sir/Madam,

Kembla Grange Waste Resource Recovery Facility 50 Wyllie Road Kembla Grange

Reference is made to your email dated 20 November 2014 seeking the NSW Rural Fire Service's (RFS) advice regarding the above development.

A large part of the subject site is mapped as bushfire prone. Generally the vegetation hazard is outside the proposed area of operations but does include the riparian corridor that bisects the processing and stockpiling area, and the proposed workshop. Other areas of bushfire prone vegetation are in relatively close proximity to the development to its north and east. This is of particular concern given that the development proposes open stockpiles of potentially flammable materials such as green waste and timber. There is potential for a bushfire in the bush both within and beyond the site, to ignite the open stockpiles. The reverse also applies, i.e. a fire within the site has the potential to spread to the adjoining bushland.

Given this bushfire risk the RFS considers it appropriate to maximise the separation distance between bushfire prone vegetation and the proposed development. This is best achieved through the provision of an appropriately managed asset protection zone (APZ). The RFS provides recommended conditions below and includes an APZ within the riparian corridor. Whilst acknowledging the vegetation management plan and landscaping plan for this riparian corridor it is the view of the RFS that the need to minimise bushfire risk should take precedence over these plans.

The following are the RFS's recommended conditions of consent:

1. At the commencement of works and in perpetuity the property shall be managed as an inner protection area (IPA) as outlined within section 4.1.3 and Appendix 5 of 'Planning for Bush Fire Protection 2006' and the NSW Rural Fire Service's document 'Standards for asset protection zones' as follows:
 - for 100m north and east of the outdoor processing and stockpiling area.
 - west and south of the outdoor processing and stockpiling area to the property boundary.
 - an additional 19m east of the proposed workshop building.

Postal address

NSW Rural Fire Service
Records Management
Locked Bag 17
GRANVILLE NSW 2141

Street address

NSW Rural Fire Service
Glendenning Customer Service
Centre
42 Lamb Street
GLENDENNING NSW 2761

T 1300 NSW RFS
F (02) 8867 7983

www.rfs.nsw.gov.au

Email: csc@rfs.nsw.gov.au

Note: The asset protection zone includes all of the riparian area between the processing and stockpiling area and the workshop area.

2. Construction of the workshop building, other than its western elevation, shall comply with Sections 3 and 8 (BAL 40) Australian Standard AS3959-2009 'Construction of buildings in bush fire-prone areas' and section A3.7 Addendum Appendix 3 of 'Planning for Bush Fire Protection'.

3. Construction of the western elevation of the workshop building shall comply with sections 3 and 7 (BAL 29) of Australian Standard AS3959-2009 'Construction of buildings in bush fire-prone areas' and section A3.7 Addendum Appendix 3 of 'Planning for Bush Fire Protection'.

4. Construction of the south-eastern and north-eastern elevations of the office building shall comply with sections 3 and 7 (BAL 29) of Australian Standard AS3959-2009 'Construction of buildings in bush fire-prone areas' and section A3.7 Addendum Appendix 3 of 'Planning for Bush Fire Protection'.

5. Construction of the south-western and north-western elevations of the office building shall comply with sections 3 and 6 (BAL 19) of Australian Standard AS3959-2009 'Construction of buildings in bush fire-prone areas' and section A3.7 Addendum Appendix 3 of 'Planning for Bush Fire Protection'.

N.B. The above construction standards are based on maintenance of the riparian corridor as an inner protection area as per condition 1.

6. The existing buildings to be retained are required to be upgraded to improve ember protection. This is to be achieved by enclosing all openings (excluding roof tile spaces) or covering openings with a non-corrosive metal screen mesh with a maximum aperture of 2mm. Where applicable, this includes any sub floor areas, openable windows, vents, weepholes and eaves. External doors are to be fitted with draft excluders.

7. Landscaping to the site is to comply with the principles of Appendix 5 of 'Planning for Bush Fire Protection 2006'. In this regard the following landscaping principles are to be incorporated into the development:

- Restrict planting in the immediate vicinity of the buildings;
- Maximum tree cover should be less than 15%, and maximum shrub cover less than 10%;
- Planting should not provide a continuous canopy to the building (i.e. trees or shrubs should be isolated or located in small clusters);
- Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies;
- Use smooth bark species of trees species which generally do not carry a fire up the bark into the crown;
- Avoid planting of deciduous species that may increase fuel at surface/ ground level (i.e. leaf litter);
- Avoid climbing species to walls;
- Use of low flammability vegetation species; and
- No additional planting within the riparian corridor.

If you have any queries regarding this advice, please contact Peter Eccleston on 1300 NSW RFS.

Yours faithfully,



Catherine Ryland
Team Leader Development Assessment & Planning
Customer Service Centre (East)