

Jason Maslen
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Ref/Job No: 13GOSBUS-0034

8 May 2015

Dear Jason,

RE: Kembla Grange Waste Resource Recovery Facility, 50 Wylie Road, Kembla Grange (S14/0039)

I refer to correspondence from NSW Rural Fire Service (RFS) to Department of Planning and Environment in regards to recommended conditions for bushfire protection for the abovementioned proposal. I have engaged in email and telephone communication with you between 22nd April and 4th May with the aim of providing RFS with the information necessary to understand the proposal in full, particularly the location of the potentially combustible elements of the proposed processing and stockpiling and the provision of adequate asset protection zones (APZ) to same. The first attachment to this letter is a copy of the email correspondence between us during the said dates.

The following information presents detailed information on the proposed stockpiling and processing of potentially combustible materials and justifies the proposed APZ. The points below respond to the recommended conditions in the RFS letter and are numbered accordingly.

1. Asset protection zones

The recommended 100 m APZ is viewed to be excessive for the nature of the proposal and the level of bushfire risk to and from the site. Notwithstanding this, the site plan has been amended (Attachment 2) to confine the loading, stockpiling and processing stages of the combustible waste to more than 100 m from the riparian zone to the east as follows:

- Stockpiling and loading area for green waste and timber to be confined to the western and south-western sides of the 'Indoor Processing & Storage Shed' over 100 m from the riparian area, and
- 'Indoor Processing & Storage Shed' will house other combustible waste over 100 m from the riparian area.

In addition to the APZs, all external stockpiles, loading and storage areas, as well as road and hard surfaces can be drenched with a sprinkler system designed for dust control. The system can be activated if fire or embers threaten the facility and is powered by a generator with back-up battery power. In addition to the sprinklers, there will be a 20,000 litre tank plus dam that can be used as a static water supply by fire fighters. A water truck

will also be on site with 30,000 litre capacity and 30 m water spray canon that can empty in 10 minutes and refill in 15 minutes.

New and existing buildings are also proposed to be constructed and retrofitted with bushfire protection measures in line with *AS 3959-2009 Construction of buildings in bushfire prone areas* which will minimise the chance of ignition from a fire in the riparian area. These are not habitable buildings and AS 3959 does not typically apply to these types of structures or developments under the *Building Code of Australia* or *Planning for Bushfire Protection 2006*.

It is requested that the RFS recommended condition be amended to require management as an Inner Protection Area to the facility area with the exception of the riparian zone.

2. Construction of the Workshop Building

This condition is not dissimilar to that proposed in the bushfire report, other than the RFS has requested that BAL-40 apply to three elevations rather than two. The applicant will accept this condition.

3. Construction of the Workshop Building

As above. The applicant will accept this condition.

4. Construction of the Office Building

RFS recommends reducing the BAL from that proposed in the bushfire report from BAL-FZ/40 to BAL-29/19 due to the RFS recommendation to maintain the adjacent riparian area as an Inner Protection Area. As it is requested to remove the Inner Protection Area requirement from the riparian area (see point 1 above) it is recommended the BAL be increased to align with that proposed in the bushfire report. That is, the north, west and south elevations to comply with BAL-FZ, and the east elevation to comply with BAL-40.

5. Construction of the office building

As above. It is recommended the BAL be increased to align with that proposed in the bushfire report. That is, the north, west and south elevations to comply with BAL-FZ, and the east elevation to comply with BAL-40.

6. Existing buildings

RFS recommends upgrading the existing buildings to improve ember protection. This recommendation is not dissimilar to that proposed in the bushfire report. The applicant will accept this condition.

7. Landscaping

A recommendation on landscaping across the site was not provided in the bushfire report. It is requested that the RFS recommended condition be amended to exclude the riparian zone.

In summary, the stockpiling and processing areas of combustible materials have been confined to areas on the site with least exposure to the bushfire hazard. In combination with the sprinkler system, static water supply, water cannon and building construction standards as per AS 3959, it is of my professional opinion that the riparian area, as proposed, can co-exist with the proposed facility in a manner that achieves the aim and objectives of *Planning for Bushfire Protection 2006*.

Should you have any questions please don't hesitate to contact me on 02 4302 1220 to discuss.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Peterson', with a stylized flourish at the end.

David Peterson

Principal Bushfire Consultant

FPAA BPAD Certified Practitioner No. BPD-L3-18882

ATTACHMENT 1 - RFS EMAIL CORRESPONDENCE

Natalie South

From: Jason Maslen <Jason.Maslen@rfs.nsw.gov.au>
Sent: Monday, 4 May 2015 7:12 AM
To: David Peterson
Subject: RE: Kembla Grange Waste Resource Recovery - response to RFS concerns

Hi David,

Yes that is helpful. So please do so and I will confer with you when I have the referral from DPE.

Regards,

Jason

From: David Peterson [mailto:DavidP@ecoaus.com.au]
Sent: Friday, 1 May 2015 1:47 PM
To: Jason Maslen
Subject: RE: Kembla Grange Waste Resource Recovery - response to RFS concerns

Hi Jason,

Requested plan attached. It clearly marks the location of storage/stockpiles – of which the combustible ones (greenwaste, timber and rubbish) are either in the shed or to the west of it, being 100m from the riparian zones to the east.

If you are happy with this, I will prepare a letter and forward it to you through DPE so that a formal response can be made.

Thanks again

Regards
Dave

David Peterson
Principal Bushfire Consultant
Manager, Central Coast Office

From: Jason Maslen [mailto:Jason.Maslen@rfs.nsw.gov.au]
Sent: Wednesday, 29 April 2015 8:47 AM
To: David Peterson
Subject: RE: Kembla Grange Waste Resource Recovery - response to RFS concerns

Thanks Dave.

That is quite helpful. I would think that there would be scope for revised APZ requirements based on what you have said below and construction of the proposed buildings to appropriate AS3959-2009 standards.

I order to confirm so, I would need a plan which reflects the general location of uses you mention below (i.e. revised / marked up Usage Areas Plan). Also, I would need something to come via DPE so that we could revise our response to them.

Jason



Jason Maslen | Acting Team Leader, Development Assessment and Planning | Customer Service Centre East

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PREPARE. ACT. SURVIVE.

From: David Peterson [<mailto:DavidP@ecoaus.com.au>]

Sent: Wednesday, 29 April 2015 6:50 AM

To: Jason Maslen

Subject: RE: Kembla Grange Waste Resource Recovery - response to RFS concerns

Hi Jason,

Latest plans attached. Some information that may assist:

- The only stockpiles anywhere near the riparian area are dirt and concrete and brick.
- The green waste is as far west as it can go and would be well over 100m away from the riparian area.
- The rubbish will be inside the processing and storage shed.
- There will be a full watering system with sprinklers to control every square meter of stockpile and road areas.
- Water system is also ran by generator (with back-up battery) that is located to the far east.
- There will also be 20,000 of water in tank , with irrigation on the roof, and a 20m wide by approx 80m long and 6m deep dam full of water.
- There is also a 30,000L water truck with a 30 meter water spray cannon that can empty in 10 minutes and fill up in 15 minutes.

Cheers

Dave

David Peterson

Principal Bushfire Consultant

Manager, Central Coast Office

From: Jason Maslen [<mailto:Jason.Maslen@rfs.nsw.gov.au>]

Sent: Tuesday, 28 April 2015 10:18 AM

To: David Peterson

Subject: RE: Kembla Grange Waste Resource Recovery - response to RFS concerns

David,

Would you be able to email me a copy of the site layout plan that you have been using for this proposal? I've looked at the plans available on the DPE website but want to make sure I'm looking at the same thing you are.

Thanks,

Jason

From: David Peterson [<mailto:DavidP@ecoaus.com.au>]

Sent: Wednesday, 22 April 2015 4:27 PM

To: Jason Maslen

Cc: Iona Cameron

Subject: Kembla Grange Waste Resource Recovery - response to RFS concerns

Importance: High

Hi Jason,

I spoke to Iona this morning in regards to discussing the recommended APZ in the RFS letter attached. Peter Eccleston undertook the previous assessment.

It would be good to discuss this with you in the morning (Thursday).

I believe Peter advised of a 100m APZ from the proposed stockpiles based on an understanding that 100m would be available. Unfortunately the 100m to the east picks up a small drainage line that is required to be revegetated.

I don't believe a 100m APZ is required for the stockpiles and the site sheds (non-habitable development) can be addressed through building construction rather than increasing APZs.

Is it possible to have this position reviewed? It would be good to be able to chat about it in the morning.

Regards
Dave

David Peterson

Principal Bushfire Consultant
Manager, Central Coast Office
FPAA Certified Practitioner No. BPD-PA-18882

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ATTACHEMENT 2 - REVISED SITE PLAN

LEGEND

- 
- DENOTES PROPOSED BATTER (1 IN 2) TO BE LANDSCAPED



 DENOTES PROPOSED LANDSCAPING/BATTER PROTECTION



 DENOTES RIPARIAN CORRIDOR

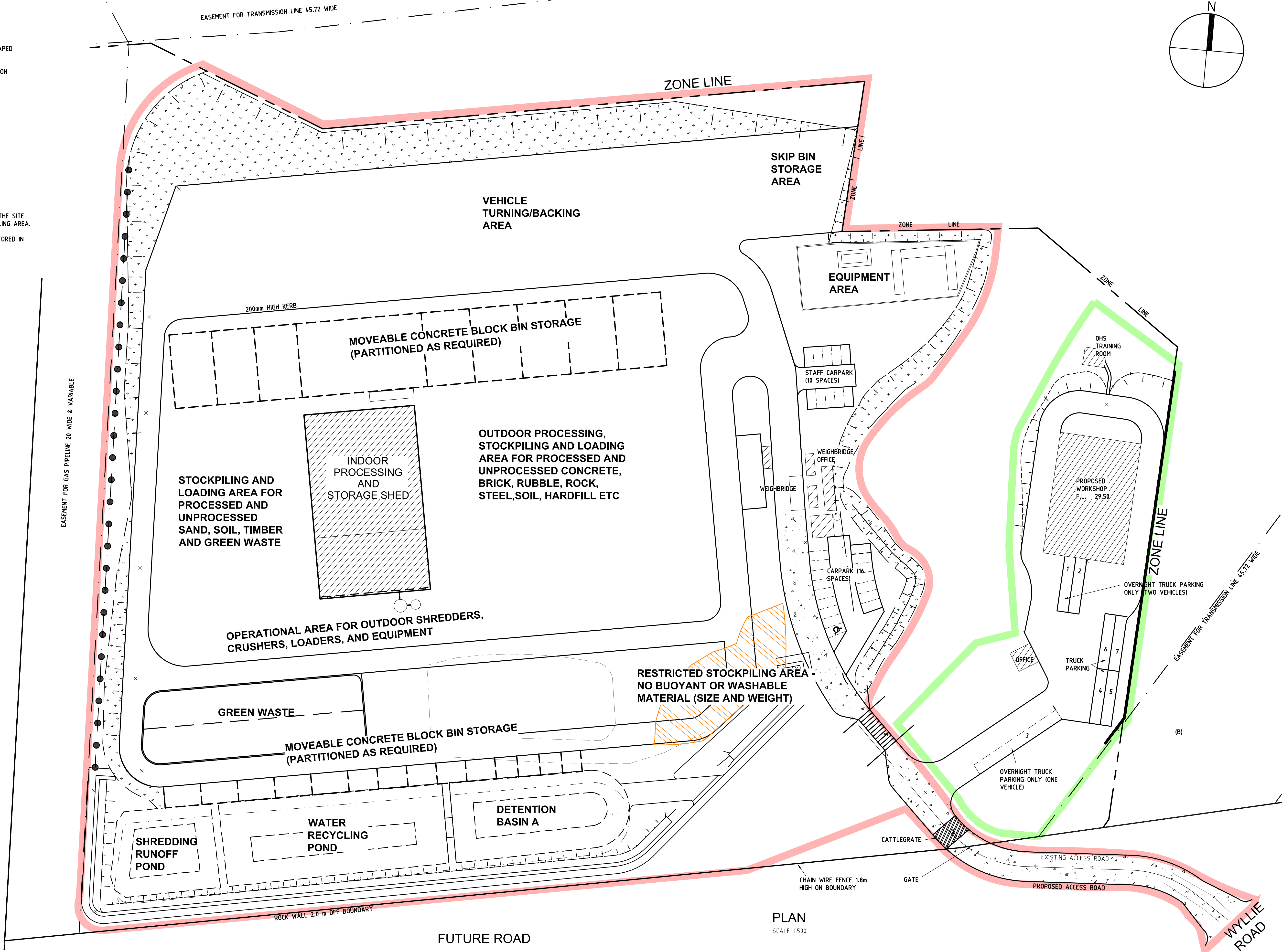


 DENOTES PROPOSED ROAD UPGRADING



 DENOTES PROPOSED RESTRICTED STOCKPILING AREA

- NOTES:
1. MATERIALS WHICH ARE LIABLE TO BE BUOYANT AND WASHED OFF THE SITE DURING A PMF SHALL NOT BE STORED IN THE RESTRICTED STOCKPILING AREA.
2. ONLY NON-BUOYANT DURABLE AND DENSE MATERIALS SHALL BE STORED IN THE RESTRICTED STORAGE AREA



PLAN

SCALE 1:500

A	NOTES RE STOCKPILING AND LOADING AREAS AMENDED	01-05-2015	A.P.	W.M.
Revision	Amendment or reason for issue	Issue date	Drawn by	Authorised



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Surveyor	DENNIS SMITH	Date	FEB 2014
Date of Survey		Drawn	A PROUDLOVE
Height Datum	AHD	Designed	M.I.E.Aust. C.P.Eng
Origin		Checked	
Horiz. Datum		Approved	

Drawing Title		Project No.	
PROPOSED INDUSTRIAL DEVELOPMENT		KF110816	
LOT 10 DP 878167		Drawing No.	
WYLLIE ROAD, KEMBLA GRANGE		C34	
OPERATIONAL PLAN- LAYOUT VERSION 1		Sheet	Revision
		18 Of 18	A
Scale 1:500 @ A1 1:1000 @ A3		Drawing Status	
		ISSUED FOR DA APPROVAL	