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NSW Department of Planning and Environment
27/ 320 Pitt Street, Sydney, NSW, 2000

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**Moorebank Precinct East (MPE) and Moorebank Precinct West (MPW) –
NSW Rural Fire Service response/recommended conditions of approval**

Dear Karen

This letter provides a response to the letter prepared by NSW Rural Fire Service, regarding "Moorebank Precinct East Stage 2 and Moorebank Precinct West Stage 2" (dated 20 September 2017) issued to Nathan Cairney (Tactical Group) by Dominic Cinnion (Department of Planning and Environment (DP&E) on 9 October 2017.

A response to the recommended conditions of approval raised in the NSW Rural Fire Service letter is provided in Attachment A.

SIMTA would welcome the opportunity to discuss this with DP&E further.

Please do not hesitate to contact Nathan Cairney (Tactical Group) should you have any further comments or questions.

Yours sincerely



Michael Yiend
Development Director
Qube Holdings Ltd

CC. Michael Yiend (Qube Property Management Services Pty Ltd),
Nathan Cairney (Tactical Group), Steve Ryan (Tactical Group),
Claire Vahtra (Arcadis), Westley Owers (Arcadis).

Attachment A – NSW Rural Fire Service letter (dated 20 September 2017) response

MPW Stage 2 (SSD 7709)

NSW RFS comment	SIMTA Response	Reference
<p>Reference is made to the correspondence dated 5 September 2017 seeking comments in relation to the bush fire assessments prepared in relation to the above State Significant Developments [MPE Stage 2 (SSD 7628) and MPW Stage 2 (SSD 7709)] in accordance with the <i>Environmental Planning and Assessment Act 1979</i>.</p> <p>The New South Wales Rural Fire Service (NSW RFS) has reviewed the information provided and advises that it has no objection to the proposals subject to the following conditions:</p>	Noted.	N/A
<p>1. The entire development sites be managed as an Inner Protection Area (IPA) as outlined within section 4.1.3 and Appendix 5 of the Planning for Bush Fire Protection 2006 and NSW Rural Fire Service's document <i>Standards for asset protection zones</i>.</p>	<p>A Bushfire Assessment was provided with the MPW Stage 2 EIS (Appendix W). The Bushfire Assessment for the MPW Stage 2 Proposal provided a comprehensive assessment in consideration of the aims and objectives of the Planning for Bushfire Protection 2006 (refer to Section 4 of Appendix W of the EIS). The assessment concluded that the MPW Stage 2 Proposal 'satisfactorily addressed' the aims and objectives of the policy.</p> <p>In particular, the assessment made the following recommendations for the MPW Stage 2 Proposal:</p> <ul style="list-style-type: none"> The Defendable Space located between the warehousing area and the conservation area shall be maintained as an Inner Protection Area [IPA] and managed to the standards as required by <i>Planning for Bushfire Protection 2006</i> and the NSW Rural Fire Service's document 'Standards for Asset Protection Zones'. The remainder of the Proposal site shall be maintained to a standard that reduces dry fuel loads to 5 – 8 tonnes per hectare [Outer Protection Area [OPA]]. 	<p>Appendix W of the MPW Stage 2 EIS</p> <p>Section 8 of the MPW Stage 2 RfS</p>

NSW RFS comment	SIMTA Response	Reference
	<p>In addition to this, the MPW Stage 2 Response to Submissions (RtS, Arcadis, 2017- Section 8) included a number of additional mitigation measures for bushfire management during both construction and operation of the MPW Stage 2 Proposal. These are as follows:</p> <ul style="list-style-type: none"> • (No. 13A – construction) A bushfire management strategy, or equivalent, will be prepared as part of the CEMP for the Amended Proposal. The strategy will include: <ul style="list-style-type: none"> – Emergency response plans and procedures – Restrictions on activities (namely hot works) that cannot be undertaken on total fire ban days within areas of high Bushfire Hazard Rating, unless otherwise advised by the NSW Rural Fire Service. – All construction site offices and temporary buildings will be located outside buffer areas to ensure minimum setbacks of 10 m. – All construction site offices will be accessible via access roads suitable for firefighting appliances similar to NSW Rural Fire Service category 1 tankers. • (No. 13B – operation) A bushfire management strategy, or equivalent, would be prepared as part of the OEMP for the Amended Proposal. In particular, the strategy would ensure management of landscaped areas within the Stage 2 site would be undertaken to maintain minimum dry fuel loads. <p>It is noted that Section 4.1 of the <i>Planning for Bushfire Protection 2006</i> refers only to ‘planning controls for residential and rural subdivision’, both of which are not included in the MPW Stage 2 Proposal. Section 4.3.6 (f) of the <i>Planning for Bushfire Protection 2006</i> applies to buildings which are classed 5-8 under the BCA, which includes the building proposed within the MPW Stage 2 Proposal.</p>	

NSW RFS comment	SIMTA Response	Reference
	<p>In summary, the MPW Stage 2 Proposal satisfactorily addresses the aims and objectives of the <i>Planning for Bushfire Protection 2006</i> and includes a number of mitigation measure for bushfire management.</p> <p>In consideration of the above, the following amendments (with additions bold and underlined and deletions bold underlined and struck through) should be made to the Recommended condition of approval:</p> <p>The entire development sites area between the western boundary of the conservation area and the western boundary of the perimeter road would be managed as <u>to the standards of an Inner Protection Area (IPA) as outlined within section 4.1.3 and Appendix 5 of</u> the Planning for Bush Fire Protection 2006 and NSW Rural Fire Service's document <i>Standards for asset protection zones</i>.</p> <p><u>The remainder of the Proposal site would be maintained to a standard that reduces dry fuel loads to 5-8 tonnes per hectare [Outer Protection Area] as identified in the Planning for Bush Fire Protection 2006 and NSW Rural Fire Service's document Standards for asset protection zones.</u></p>	
<p>2. Public road access shall comply with section 4.1.3 (1) of <i>Planning for Bush Fire Protection 2006</i> except for the requirement for through access.</p>	<p>A Bushfire-Assessment was provided with the MPW Stage 2 EIS (Appendix W). The Bushfire Assessment for the MPW Stage 2 Proposal provided a comprehensive assessment in consideration of the aims and objectives of the <i>Planning for Bushfire Protection 2006</i> (refer to Section 4 of Appendix W of the EIS). The assessment concluded that the MPW Stage 2 Proposal 'satisfactorily addressed' the aims and objectives of the policy.</p> <p>It is noted that Section 4.1 of the Planning for Bushfire Protection 2006 refers only to 'planning controls for residential and rural subdivision', both of which are not included in the MPW Stage 2 Proposal. Section 4.3.6 (f) of the Planning for Bushfire Protection 2006 applies to buildings which are classed</p>	<p>Appendix W of the MPW Stage 2 EIS</p>

NSW RFS comment	SIMTA Response	Reference
	<p>5-8 under the BCA, which includes the building proposed within the MPW Stage 2 Proposal.</p> <p>In consideration of the above, the following amendments (with additions bold and underlined and deletions bold underlined and struck through) should be made to the Recommended condition of approval:</p> <p>Public road access shall comply with <u>the aims and objectives</u> section 4.1.3 (1) of <i>Planning for Bush Fire Protection 2006</i> except for the requirement for through access.</p>	
<p>3. The provision of water, electricity and gas shall comply with section 4.1.3 of <i>Planning for Bush Fire Protection 2006</i>'</p>	<p>A Bushfire Assessment was provided with the MPW Stage 2 EIS (Appendix W). The Bushfire Assessment for the MPW Stage 2 Proposal provided a comprehensive assessment in consideration of the aims and objectives of the <i>Planning for Bushfire Protection 2006</i> (refer to Section 4 of Appendix W of the EIS). The assessment concluded that the MPW Stage 2 Proposal 'satisfactorily addressed' the aims and objectives of the policy.</p> <p>SIMTA has no objection to the inclusion of this recommended condition of approval within the MPW Stage 2 approval instrument.</p>	<p>Appendix W of the MPW Stage 2 EIS</p>

MPE Stage 2 (SSD 7628)

NSW RFS comment	SIMTA Response	Reference
<p>Reference is made to the correspondence dated 5 September 2017 seeking comments in relation to the bush fire assessments prepared in relation to the above State Significant Developments [MPE Stage 2 (SSD 7628) and MPW Stage 2 (SSD 7709)] in accordance with the <i>Environmental Planning and Assessment Act 1979</i>.</p> <p>The New South Wales Rural Fire Service (NSW RFS) has reviewed the information provided and advises that it has no objection to the proposals subject to the following conditions:</p>	<p>Noted.</p>	<p>N/A</p>
<p>1. The entire development sites be managed as an Inner Protection Area (IPA) as outlined within section 4.1.3 and Appendix 5 of the Planning for Bush Fire Protection 2006 and NSW Rural Fire Service's document <i>Standards for asset protection zones</i>.</p>	<p>A Bushfire Impact Assessment was provided with the MPE Stage 2 EIS (Appendix U). The Bushfire Impact Assessment for the MPE Stage 2 Proposal provided a comprehensive assessment in consideration of the aims and objectives of the <i>Planning for Bushfire Protection 2006</i> (refer to Section 4 of Appendix W of the EIS). The assessment concluded that the MPE Stage 2 Proposal 'satisfactorily addressed' the aims and objectives of the policy.</p> <p>In particular, the assessment identifies that 'the continued maintenance of the existing vegetation on the land to the east and south of the warehouses, within the Proposal site, provides a satisfactory reduction of fuel loads within these defensible spaces' (refer to Section 4.1 of Appendix U of the EIS).</p> <p>In addition to this, the MPE Stage 2 Response to Submissions (RtS, Arcadis, 2017- Section 8) included a number of additional mitigation measures for bushfire management during both construction and operation of the MPE Stage 2 Proposal. These are as follows:</p> <ul style="list-style-type: none"> • (No. 13A – construction) A bushfire management strategy, or equivalent, will be prepared as part of the CEMP for the Amended Proposal. The strategy will include: <ul style="list-style-type: none"> – Emergency response plans and procedures – Restrictions on activities (namely hot works) that cannot be undertaken on total fire ban days within areas of high 	<p>Appendix U of the MPE Stage 2 EIS Section 8 of the MPE Stage 2 RtS</p>

NSW RFS comment	SIMTA Response	Reference
	<p>Bushfire Hazard Rating, unless otherwise advised by the NSW Rural Fire Service.</p> <ul style="list-style-type: none"> – All construction site offices and temporary buildings will be located outside buffer areas to ensure minimum setbacks of 10 m. – All construction site offices will be accessible via access roads suitable for firefighting appliances similar to NSW Rural Fire Service category 1 tankers. • (No. 13B – operation) A bushfire management strategy, or equivalent, would be prepared as part of the OEMP for the Amended Proposal. In particular, the strategy would ensure management of landscaped areas within the Stage 2 site would be undertaken to maintain minimum dry fuel loads. <p>It is noted that Section 4.1 of the <i>Planning for Bushfire Protection 2006</i> refers only to 'planning controls for residential and rural subdivision', both of which are not included in the MPE Stage 2 Proposal. Section 4.3.6 (f) of the <i>Planning for Bushfire Protection 2006</i> applies to buildings which are classed 5-8 under the BCA, which includes the building proposed within the MPE Stage 2 Proposal.</p> <p>In summary, the MPE Stage 2 Proposal satisfactorily addresses the aims and objectives of the <i>Planning for Bushfire Protection 2006</i> and includes a number of mitigation measure for bushfire management.</p> <p>In consideration of the above, the following amendments (with additions bold and underlined and deletions bold underlined and struck through) should be made to the Recommended condition of approval:</p> <p>The entire development sites <u>area between the eastern boundary of the Proposal site and the western boundary of the perimeter road and the southern boundary of the Proposal site and the northern boundary internal transfer road</u> be managed as to the standards of an Inner Protection</p>	

NSW RFS comment	SIMTA Response	Reference
	<p><u>Area (IPA) as outlined within section 4.1.3 and Appendix 5</u> of the Planning for Bush Fire Protection 2006 and NSW Rural Fire Service's document <i>Standards for asset protection zones</i>.</p>	
<p>2. Public road access shall comply with section 4.1.3 (1) of <i>Planning for Bush Fire Protection 2006</i> except for the requirement for through access.</p>	<p>A Bushfire Impact Assessment was provided with the MPE Stage 2 EIS (Appendix U). The Bushfire Impact Assessment for the MPE Stage 2 Proposal provided a comprehensive assessment in consideration of the aims and objectives of the <i>Planning for Bushfire Protection 2006</i> (refer to Section 4 of Appendix U of the EIS). The assessment concluded that the MPE Stage 2 Proposal 'satisfactorily addressed' the aims and objectives of the policy.</p> <p>It is noted that Section 4.1 of the Planning for Bushfire Protection 2006 refers only to 'planning controls for residential and rural subdivision', both of which are not included in the MPW Stage 2 Proposal. Section 4.3.6 (f) of the Planning for Bushfire Protection 2006 applies to buildings which are classed 5-8 under the BCA, which includes the building proposed within the MPW Stage 2 Proposal.</p> <p>In consideration of the above, the following amendments (with additions bold and underlined and deletions bold underlined and struck through) should be made to the Recommended condition of approval:</p> <p>Public road access shall comply with <u>the aims and objectives</u> section 4.1.3 (1) of <i>Planning for Bush Fire Protection 2006</i> except for the requirement for through access.</p>	<p>Appendix U of the MPE Stage 2 EIS</p>
<p>3. The provision of water, electricity and gas shall comply with section 4.1.3 of <i>Planning for Bush Fire Protection 2006</i>'</p>	<p>A Bushfire Impact Assessment was provided with the MPE Stage 2 EIS (Appendix U). The Bushfire Impact Assessment for the MPE Stage 2 Proposal provided a comprehensive assessment in consideration of the aims and objectives of the <i>Planning for Bushfire Protection 2006</i> (refer to Section 4 of Appendix U of the EIS). The assessment concluded that the MPE Stage 2 Proposal 'satisfactorily addressed' the aims and objectives of the policy.</p>	<p>Appendix U of the MPE Stage 2 EIS</p>

NSW RFS comment	SIMTA Response	Reference
	<p>Overall, the MPE Stage 2 Proposal has been designed to accommodate heavy vehicle access it would comply with the requirements of the <i>Planning for Bush Fire Protection 2006</i>.</p> <p>SIMTA has no objection to the inclusion of this recommended condition of approval within the MPE Stage 2 approval instrument.</p>	