



NSW RURAL FIRE SERVICE

Dept. Of Planning - Urban
Locked Bag 5022
Parramatta NSW 2124

Your reference: SSD-10101987
Our reference: DA20211118005042-Original-1

ATTENTION: Shaun Williams

Date: Tuesday 7 December 2021

Dear Sir/Madam,

Development Application

Other - Other Assessment - Commercial Premises

Kemps Creek Data Centre (SSD-10101987) 707-769 Mamre Road Kemps Creek NSW 2178, Lots X & Y DP421633 and Lot 22 DP258414

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 17/11/2021.

The NSW Rural Fire Service has reviewed the Environmental Impact Statement and provides the following recommendations:

Asset Protection Zones

Intent of measures: to provide suitable building design, construction and sufficient space to ensure that radiant heat levels do not exceed critical limits for firefighters and other emergency services personnel undertaking operations, including supporting or evacuating occupants.

1. A minimum Asset Protection Zone setback of 27 metres must be provided to the southern and western elevation/s of the building/s.

2. From the start of building works and in perpetuity, the entire development site of the proposed data centre must be managed as an inner protection area (IPA) in accordance with the requirements of Appendix 4 of *Planning for Bush Fire Protection 2019*. When establishing and maintaining an IPA, the following requirements apply:

- Tree canopy cover be less than 15% at maturity;
- Trees at maturity are not touching or overhang the building;
- Lower limbs are removed up to a height of 2m above the ground;
- Tree canopies are separated by 2 to 5m;
- Preference is given to smooth-barked and evergreen trees;
- Large discontinuities or gaps in vegetation are provided to slow down or break the progress of fire towards buildings;
- Shrubs are not located under trees;
- Shrubs do not form more than 10% of ground cover;

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- Clumps of shrubs are separated from exposed windows and doors by a distance of at least twice the height of the vegetation.
- Grass to be kept mown (as a guide grass should be kept to no more than 100mm in height);
- Leaves and vegetation debris are removed; and
- NSW Rural Fire Service's document *Standards for asset protection zones*.

3. Landscaping within the entire development site of the proposed data centre must comply with Appendix 4 of *Planning for Bush Fire Protection 2019*. In this regard, the following principles are to be incorporated:

- A minimum 1 metre wide area (or to the property boundary where the setbacks are less than 1 metre), suitable for pedestrian traffic, must be provided around the immediate curtilage of the building;
- Planting is limited in the immediate vicinity of the building;
- Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters);
- Landscape species are chosen to ensure tree canopy cover is less than 15% (IPA), and less than 30% (OPA) at maturity and trees do not touch or overhang buildings;
- 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 spread 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 and pergolas;
- Locate combustible materials such as woodchips/mulch, flammable fuel stores away from the building;
- Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from the building; and
- Low flammability vegetation species are used.

Construction Standards

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities.

4. New construction on the southern and western elevation/s must comply with Sections 3 and 8 (BAL 40) of the Australian Standard AS3959-2018 *Construction of buildings in bush fire-prone areas* or NASH Standard (1.7.14 updated) *National Standard Steel Framed Construction in Bushfire Areas – 2014* as appropriate, and Section 7.5 of *Planning for Bush Fire Protection 2019*.

5. New construction on the northern and eastern elevation/s must comply with Sections 3 and 7 (BAL 29) of the Australian Standard AS3959-2018 *Construction of buildings in bush fire-prone areas* or NASH Standard (1.7.14 updated) *National Standard Steel Framed Construction in Bushfire Areas – 2014* as appropriate, and Section 7.5 of *Planning for Bush Fire Protection 2019*.

6. The proposed diesel storage tanks must be located underground and be designed with a fail-safe system to prevent ignition and propagation from potential bush fire attacks, including the connections to the generators or other exposed parts of the system.

7. Any new Class 10b structures as defined per the *National Construction Code* must be non-combustible.

Access Requirements

Intent of measures: to provide safe operational access to structures and water supply for emergency services, while residents are seeking to evacuate from an area.

8. Property access roads must comply with access requirements under Table 7.4a of *Planning for Bush Fire Protection 2019*.

Water and Utility Services

Intent of measures: to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.

9. The provision of water, electricity and gas must comply with Table 7.4a of *Planning for Bush Fire Protection 2019*.

Emergency Management

Intent of measures: to provide suitable emergency and evacuation arrangements for occupants.

10. A Bush Fire Emergency Management and Evacuation Plan must be prepared and be consistent with the NSW RFS document: *A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan*.

For any queries regarding this correspondence, please contact Simon Derevnin on 1300 NSW RFS.

Yours sincerely,

Adam Small

Supervisor Development Assessment & Plan

Built & Natural Environment