

From: [Brendan M Hurley](#)
To: [Melissa Halloran](#); [Kate Masters \(Planning\)](#)
Cc: [Fire Safety](#)
Subject: Wagga Wagga Special Activation Precinct. BFS20/2224
Date: Tuesday, 29 September 2020 11:07:26 AM
Attachments: [image002.png](#)
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Wagga Wagga Special Activation Precinct

Dear Kate & Melissa,

Fire & Rescue NSW (FRNSW) acknowledge the receipt of your email on the 21st July 2020, requesting input into the Wagga Wagga Special Activation Precinct (SAP) draft Master Plan and associated Discussion Paper (Explanation of Intended Effects).

FRNSW have reviewed the documentation that was provided in support of the development and provide the following comments for your consideration. We have identified a number of aspects of the SAP that may pose a significant risk to existing and proposed businesses and infrastructure, including industrial and commercial sites.

- Waste management facilities
- Proposed dangerous goods sites (storage, transportation and usage)
- Large isolated buildings
- Solar and renewables with battery energy storage systems (BESS)

It has been the experience of FRNSW that waste recycling facilities and large isolated buildings pose unique challenges to firefighters when responding to and managing an incident. Factors such as high and potentially hazardous fuel loads, facility layout, and design of fire safety systems have a significant impact on the ability to conduct firefighting operations safely and effectively. Consultation with organisations such as FRNSW throughout the development process enables the design and implementation of more effective fire safety solutions that help to mitigate the impact of incidents when they occur.

Large scale solar farm developments (including BESS) are usually located within NSW Rural Fire Services' (RFS) fire districts. Notwithstanding, in the event of either a significant fire event or hazardous material incident (hazmat), FRNSW will be responded to either assist the RFS or to fulfill the role of the designated hazmat combat agency. It is FRNSW experience that large-scale photovoltaic installations present unique hazards and risks to our personnel when fulfilling their emergency duties. Due to the electrical and fire hazards associated with large scale photovoltaic installations and the potential risk to the health and safety of firefighters, both FRNSW and the NSW Rural Fire Service must be able to implement effective and appropriate risk control measures when managing an emergency incident at the proposed site.

FRNSW note that screening will be carried out under SEPP 33 to determine if any of the sites are deemed potentially hazardous or offensive. Will this process still occur if proposals are allowed to follow the comply and development pathway?

As part of the standard development application process FRNSW are given the opportunity to review and provide comment once approvals have been granted and the project has progressed such that there is more relevant detailed information available. As the additional details become available FRNSW are consulted with respect to the proposed fire and life safety systems and their configuration at the project's preliminary and final design phases. FRNSW request that we are given the opportunity to review and comment on proposals that include (but not limited to) waste management, dangerous goods, large isolated buildings and solar & renewables (BESS & Hydrogen).

FRNSW are concerned with the potential impact on existing sites and infrastructure within the proposed SAP. For proposals that are allowed to follow the comply and development pathway critical evidence may be missed in emergency response planning processes. FRNSW take into consideration the following:

- Worst case credible fire scenario (evidence of calculations) impact on surrounding businesses and infrastructure (new or existing)
- Additional impact on fire hydrant water supply - pressure and flow
- The potential impact and associated costs involved on newly proposed sites regarding the installation of fire pumps and tanks to achieve fire hydrant water supply requirements under the National Construction Code.

The Wagga Wagga SAP may impact the current fire district boundaries between FRNSW and the RFS. This aspect may require ongoing review and further discussion.

If you have any queries regarding the above please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS20/2224. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Regards

Brendan

Fire and Rescue NSW



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