

**SSI-10053**

# **MOOREBANK AVENUE REALIGNMENT WORKS**

## **APPENDIX L**

Construction Bushfire Management Plan

21 APRIL 2023

# NATIONAL INTERMODAL CORPORATION

## MOOREBANK AVENUE REALIGNMENT WORKS

### CONSTRUCTION BUSHFIRE MANAGEMENT PLAN

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## REVISIONS

Revision	Date	Description	Prepared By	Approved By
A	06/02/2023	Bushfire Management Plan – Draft A	■	■
B	20/02/2023	Update following National Intermodal review	■	■
C	13/03/2023	Update following Environmental Representative (ER) and LOGOS review	■	■
D	24/03/2023	Update following ER review	■	■
E	21/04/2023	Update following consultation	■	■

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## ACRONYMS AND DEFINITIONS

Acronym	Definition
BFMC	Bushfire Management Committee
BHA	Bushfire Hazards Assessment (Appendix C of the EIS)
BOM	Bureau of Meteorology
CBMP	Construction Biodiversity Management Plan
CBFMP	Construction Bushfire Management Plan
CCS	Community Communication Strategy
CEMP	Construction Environmental Management Plan
CMS	Complaints Management System
CNVMP	Construction Noise and Vibration Management Plan
CoA	Conditions of Approval
Construction	Includes all work required to construct the Project as described in the EIS and RTS (NSW CoA A1) including commissioning trials of equipment and temporary use of any part of the Project but excluding Low Impact Work which is carried out or completed before approval of the CEMP.
CSWMP	Construction Soil and Water Management Plan (CSWMP)
CTTMP	Construction Traffic and Transport Management Plan
DAWE	Department of Agriculture, Water and Environment (now DCCEEW)
DCCEEW	Department of Climate Change, Energy, Environment and Water (formerly DAWE)
DECC	Department of Environment and Climate Change (now DPE)
DEC	Department of Environment and Conservation (now DPE)
DJLU	Defence Joint Logistics Unit
DPE	Department of Planning and Environment (formerly DPIE)
DPIE	Department of Planning, Industry and Environment (now DPE)
EIS	Environmental Impact Statement
EMP	Environmental Management Plan
EMS	Environmental management system
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPA	NSW Environment Protection Authority
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i>
EPL	Environment Protection Licence
ER	Environmental Representative
EWMS	Environmental Work Method Statement
FRNSW	Fire and Rescue NSW
HSE	Health Safety and Environment
Infrastructure Approval	SSI 10053 or NSW CoA

Acronym	Definition
LCC	Liverpool City Council
Low Impact Work	As defined in the Infrastructure Approval, and which Includes activities like survey work, investigative drilling, minor clearing, installation of mitigation measures etc. The low impact work described in this definition becomes construction when the Construction Environmental Management Plan is approved. This also applies to low impact work that has already commenced.
MARW	Moorebank Avenue Realignment Works
MIP	Moorebank Intermodal Precinct, which includes Moorebank Precinct East (MPE) and Moorebank Precinct West (MPW)
MPE	Moorebank Precinct East
MPE Site	Comprises the MPE Stage 1 Project as approved by SSD 14-6766 for the development of the intermodal terminal facility (IMT) at Moorebank and MPE Stage 2 as approved under SSD 7628 (as modified) and MPE Concept Approval (MP 10_0193) for the construction and operation of warehousing and distribution facilities and upgrades to approximately 2.1 kilometres of Moorebank Avenue.
MPW	Moorebank Precinct West
MPW Site	Comprises the MPW Stage 2 Project which is the second stage of development under the MPW Concept Approval (SSD 5066) and SSD 7709. The Project involves the construction and operation of a multi-purpose intermodal terminal facility, Rail link connection, warehousing and upgraded intersection on Moorebank Avenue.
National Intermodal	National Intermodal Corporation
NCC	National Construction Code
NML	Noise management level
OEH	NSW Office of Environment and Heritage (now NSW EES, a part DPE)
PBP	Planning for Bushfire Protection 2019 (NSW RFS)
Planning Secretary	Secretary to the DPE
POEO	<i>Protection of the Environment Operations Act 1997</i>
Project Site	Refers to the construction footprint which is approximately 18.96 hectares and includes access for the construction of road embankments and cuttings, temporary and permanent fencing, temporary and permanent water quality control basins, ancillary facilities, access roads and construction side roads. It is generally bounded by the Defence Joint Logistics Unit (DJLU), MPE, Boot land and the Sydney Trains owned land adjacent to the East Hills Railway.
REMM	Revised Environmental Management Measures
RFS	NSW Rural Fire Service
RMS	Roads and Maritime Services (now TfNSW)
RtS	Response to Submissions
SSD	State Significant Development
SSI	State Significant Infrastructure

# 1 INTRODUCTION

## 1.1 Context

This Construction Bushfire Management Plan (CBFMP or Plan) forms part of the Construction Environmental Management Plan (CEMP) for the Moorebank Avenue Realignment Works (MARW) (the Project).

This CBFMP has been prepared to address the requirements of the NSW Minister's Conditions of Approval (CoA), Commonwealth CoA and the Revised Environmental Management Measures (REMMs) detailed in the Response to Submissions (RtS) and the applicable legislation.

## 1.2 Background and Project Description

National Intermodal Corporation (National Intermodal) plans to realign and upgrade a section of Moorebank Avenue. The Project involves the realignment of an existing two-kilometre section of Moorebank Avenue, from a point approximately 130 metres south of the Anzac Road/Moorebank Avenue intersection to a point immediately north of the East Hills Railway. Moorebank Avenue currently divides the Moorebank Intermodal Precinct (MIP) into the Moorebank East Precinct (MPE site) and the Moorebank West Precinct (MPW site) (See Figure 1.1).

The Project is about three kilometres of additional road which ties in with the existing Moorebank Avenue at the northern and southern extremities. From its northernmost point, the realigned Moorebank Avenue follows the northern boundary of the MPE site, before continuing south along the MPE Site eastern boundary. This section of the realignment comprises four lanes (i.e. two lanes in each direction). At the south-western corner of the MPE Site, the new road section merges to become a dual lane road (i.e. one lane in each direction) before continuing in a south-west direction, crossing Anzac Creek, and re-joining the existing Moorebank Avenue alignment near the East Hills Railway (refer to Figure 1.1). At completion and commissioning of the realigned road section, the public through traffic using Moorebank Avenue will be redirected onto the upgraded alignment. The existing road alignment will be decommissioned and modified to function as a restricted access to the MIP.

The Project Site is approximately 18.96 hectares and includes access for the construction of road embankments and cuttings, temporary and permanent fencing, temporary and permanent water quality control basins, ancillary facilities, access roads and construction side roads. It is generally bounded by the Defence Joint Logistics Unit (DJLU), MPE, Boot land and the Sydney Trains owned land adjacent to the East Hills Railway (refer to Figure 1.1).

A detailed description of the Project is provided in Section 2 of the CEMP and is also shown on Figure 1.2.

The Project will not be staged but is anticipated to be undertaken in phases and is expected to take approximately 16 months to complete.

An Environmental Impact Statement (EIS) for the Project was prepared in March 2021 to describe and assess the Project and recommend management measures to address impacts. The EIS was exhibited by the then NSW Department of Planning, Industry and Environment (DPIE)<sup>1</sup> from 17 March 2021 to 13 April 2021 to give the community and stakeholders the opportunity to provide comment. A RtS was submitted in May 2021 to address the identified issues.

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<sup>1</sup> Now NSW Department of Planning and Environment (DPE)

The Project was approved by the NSW Minister for Planning on 14 October 2021 as State Significant Infrastructure (SSI 10053) (Infrastructure Approval) under Division 5.2 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Project is also a controlled action under Section 130(1) and 133(1) of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and was approved by the Minister for the Environment on 7 December 2021 (EPBC Approval 2020-8839).

The EIS assessed the bushfire impacts of construction of the Project. As part of EIS development, a detailed Bushfire Hazard Assessment (BHA) (Appendix C of the EIS) was prepared in accordance with the legislation. The BHA was prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued by the DPE and the Commonwealth EIS Guidelines.

Revised Environmental Management Measures (REMMs) were provided within the RtS. Where applicable, the REMMs from the RtS have been included in this CBFMP (refer to Section 6 and Appendix C).

### 1.3 Scope of the Plan

This CBFMP is applicable to the construction stage of the Project and describes how potential bushfire impacts will be managed during construction. Operational bushfire measures do not fall within the scope of this CBFMP and therefore are not included within the processes contained within the CBFMP.

### 1.4 Environmental Management System Overview

The environmental management framework for the Project is described in Section 3 of the CEMP. This CBFMP forms part of the framework for the Project. The identified NSW CoA and the REMMs will be complied with in this CBFMP.

Management measures identified in this CBFMP may also be incorporated into site or activity specific Environmental Work Method Statements (EWMS). EWMS incorporate appropriate mitigation measures and controls and identify key procedures to be used during construction activities. A template EWMS is provided in Appendix E of the CEMP.

### 1.5 CBFMP Endorsement and Approval

This CBFMP have been prepared to satisfy the NSW CoA's in relation to bushfire risk management during construction of the Project.

This CBFMP will be reviewed by the Project Manager / Delivery Team and will be endorsed by the Environmental Representative (ER) (refer to Appendix B) at least one month prior to the commencement of construction.

Construction of the Project will not commence prior to approval of the CEMP by the Secretary and endorsement of the CBFMP by the ER. The final approved Plan will be available on the MIP and/or National Intermodal website and submitted to the Commonwealth for information.

The ER can approve minor amendments to this CBFMP if they do not increase impacts to nearby receivers, do not comprise updating, are administrative nature and are consistent with the conditions of the Infrastructure Approval. This does not include any modifications to the Infrastructure Approval.



### 1.5.1 Interactions with Other Management Plans

This CBFMP has the following interrelationships with other management plans and documents:

- Construction Biodiversity Management Plan (CBMP) details areas of vegetation that may contribute to bushfire risk
- Construction Soil and Water Management Plan (CSWMP) addresses the erosion and sedimentation impacts associated with vegetation clearing
- Construction Traffic and Transport Management Plan (CTTMP) details site arrangements and access to the Project Site.

## 1.6 Consultation

### 1.6.1 Consultation for Preparation of the CBFMP

The following government agencies and stakeholders will be consulted during the development of this CBFMP:

- NSW Rural Fire Service (RFS)
- Fire and Rescue NSW (FRNSW).

A summary of the outcomes of the consultation with various agencies and stakeholders as provided in Table 1.1. Supplementary information demonstrating the consultation undertaken is included in Appendix A.

Table 1.1: Consultation Summary

Agency	Date	Person Contacted	Comment	Status
Rural Fire Service (RFS) – Macarthur Fire Control Centre	22/12/2022	RFS Representative Luke Robinson	Emailed RFS introducing the project	Closed
	10/01/2023	RFS Representative Kimberley Tadic	Email response received from RFS advising to contact the Macarthur Fire Control Centre to review the CBFMP.	
	24/03/2023	DPE portal	CBFMP submitted through DPE portal. Macarthur Fire Control Centre was also asked whether they like to review the Project Landscape Design Plan and if they wish to continue to be informed and updated about the Project Site development. Consultation to close Thursday 20 April 2023.	
	20/04/2023	N/A	Consultation closed. No comments were received.	
Fire and Rescue NSW (FRNSW)	13/01/2023	FRNSW Representative	Emailed FRNSW introducing the project	Closed
	13/01/2023	FRNSW Representative David Shield	Email response received from FRNSW to confirm FRNSW Contact (John Hawes).	

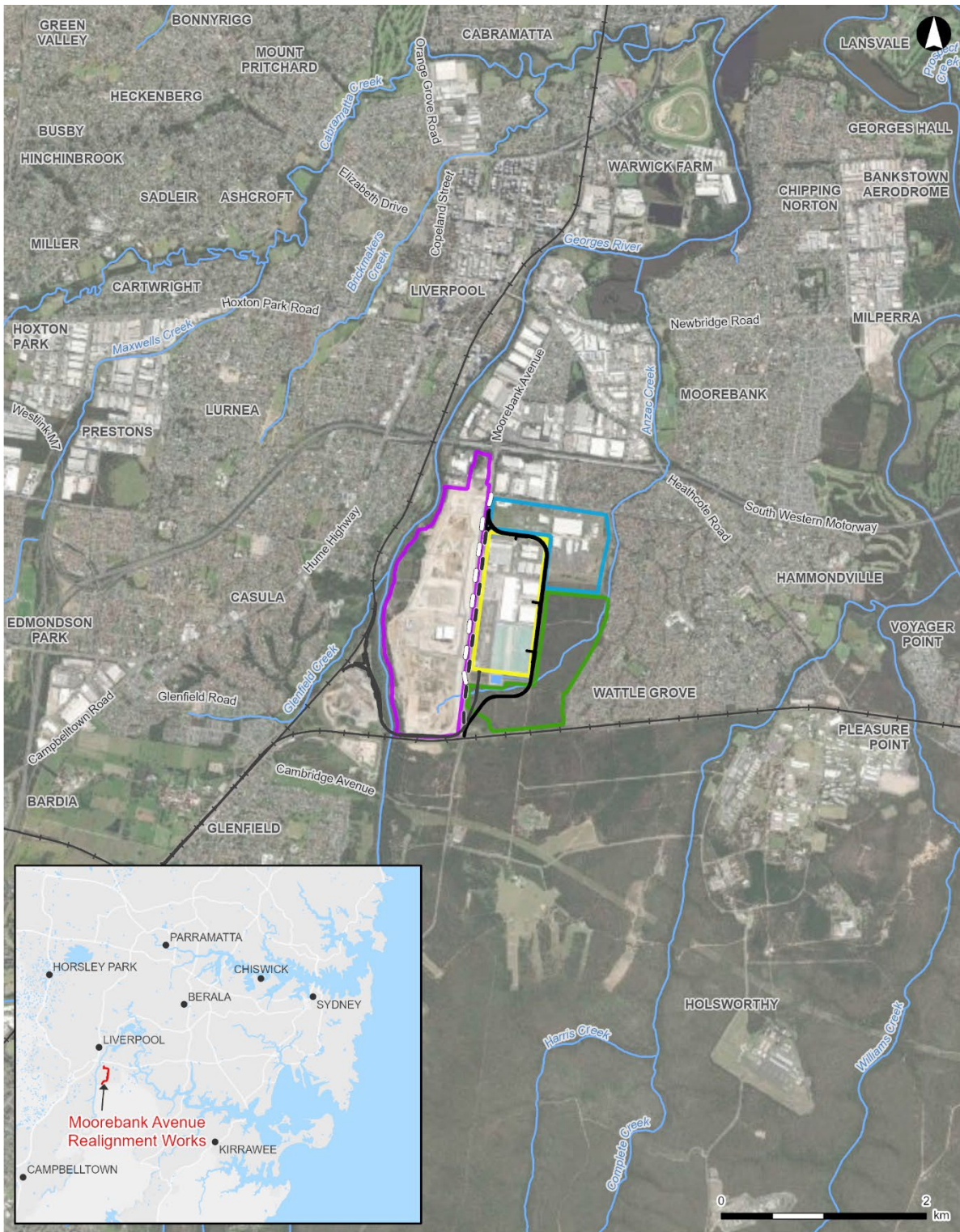
Agency	Date	Person Contacted	Comment	Status
	24/03/2023	DPE portal	CBFMP submitted through DPE portal. FRNSW was also asked whether they would like to review the Project Landscape Design Plan and if they wish to continue to be informed and updated about the Project Site development. Consultation to close Thursday 20 April 2023.	
	27/03/2023	FRNSW Representative Samantha Cavanagh	Acknowledgement was received via email for the CBFMP. No comments were provided.	
	10/04/2023	FRNSW Representative James O'Carroll	Additional acknowledgement was received via the DPE portal. No comments were provided.	
	20/04/2023	N/A	Consultation closed. No comments were received.	

### 1.6.2 Ongoing Consultation during Construction

Consultation with stakeholders, the community and relevant agencies regarding the management of bushfire risk within the Project Site will be undertaken during the construction of the Project as required. The process for the consultation is documented in the Community Communication Strategy (CCS).

Specific requirements of relevance to the management of bushfire risk, which have emerged through consultation under the EIS and RtS are evident in the CoA and REMMs included in Section 3.2 to 3.4.

In accordance with the REMM BUS32 and BUS33, consultation will be carried out during construction as required, prior to bushfire season, when higher fire weather is forecast, there are fire events in the surrounding area and to confirm any updates to security clearances, communication and access arrangements have been with NSW RFS readiness for upcoming season. Furthermore, in accordance with REMM BUS06, consultation with NSW RFS and FRNSW will be undertaken during construction to ensure emergency access is maintained during and after construction.



Legend

- Moorebank Avenue Realignment Works
- MIP Rail link
- Previous Moorebank Avenue
- Moorebank Avenue diversion road
- Watercourse
- Railway
- Moorebank Precinct West
- Moorebank Precinct East
- Boot Land boundary\*
- Defence Joint Logistics Unit
- On-site detention

\*relates to the parcel of land known as the Boot Land, does not indicate biobanking boundaries



1:55,000 at A4  
 Coordinate System: GDA2020 MGA Zone 56  
 Date issued: March 16, 2023  
 Imagery: Esri, HERE, Garmin, USGS, Earthstar Geographics



Path: C:\Users\cb98137\ARCADIS\30144760 - Env Panel Minor Projects - W\0111 CEMPI\01 Inputs\04 GISIA\_Current\B\_Maps\CEMP\CEMP.aprx

Figure 1.1: Project Location



Legend

- Moorebank Avenue Realignment Works
- Construction footprint
- Construction compound
- Watercourse
- Railway



1:16,000 at A4  
 Coordinate System: GDA2020 MGA Zone 56  
 Date issued: March 30, 2023  
 Imagery: Nearmap



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Figure 1.2: Project layout

## 2 PURPOSE AND OBJECTIVES

### 2.1 Purpose

The purpose of the CBFMP is to describe how construction impacts for potential bushfire risk and emergencies will be minimised and managed during the construction of the Project.

### 2.2 Objectives

The key objective of the CBFMP is to ensure that all bushfire impacts are managed appropriately throughout construction of the Project and consider the mitigation and management measures referred to in:

- NSW Minister's Infrastructure Approval dated 14 October 2021 (SSI-10053)
- Federal Minister for the Environment Approval dated 7 December 2021 (EPBC 2020-8839)
- *Moorebank Avenue Realignment Environmental Impact Statement Volume 1 and Volume 2* prepared by EMM for Sydney Intermodal Terminal Alliance dated March 2021 (EIS)
- *Moorebank Avenue Realignment Response to Submissions* prepared for Sydney Intermodal Terminal Alliance dated May 2021 (RtS).

### 2.3 Targets

Table 2.1 details following targets established for the management of potential bushfire impacts during construction of the Project.

Table 2.1: Project environmental targets for bushfire risk

Objective	Target	Timeframe	Responsibility
Ensure compliance with relevant NSW and Commonwealth CoA and applicable legislation	No written warnings or infringement notices Zero non-compliance	Throughout construction	Construction Contractor
Avoid, minimise or manage potential adverse bushfire impacts within and adjacent to the Project corridor	No fire incidents associated with construction activities. Any fire incidents are reported and contained	Throughout construction	Construction Contractor
Project personnel are trained and inducted for bushfire events, protection measures and emergency procedures before work commencing onsite	100% of relevant staff	Before and throughout construction	Construction Contractor

## 3 ENVIRONMENTAL REQUIREMENTS

### 3.1 Relevant Legislation and Guidelines

#### 3.1.1 Legislation

All legislation relevant to the Project is included in Appendix B of the CEMP. Legislation considered during the development of the CBFMP includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act)
- *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)
- *Protection of the Environment Operations Act 1997* (POEO Act)
- *Rural Fires Act 1997*.

#### 3.1.2 Additional Approvals, Licences, Permits and Requirements

Refer to Appendix B of the CEMP.

#### 3.1.3 Guidelines and Standards

The main guidelines, specifications and policy documents relevant to the CBFMP include:

- Standards for Asset Protection Zone (NSW RFS, N.D)
- A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014)
- Planning for Bushfire Protection 2019 (PBP) (NSW RFS, 2019)
- Australian Standard AS3745-2010 – Planning for emergencies in facilities (Standards Australia, 2010)
- Australian Standard AS1851-2012 – Routine Service of Fire Protection Systems and Equipment (Standards Australia, 2012)
- Australian Standard AS3959-2018 – Construction of Buildings in Bushfire-prone Areas (Standards Australia, 2018)
- A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014)
- National Construction Code (NCC, 2020).

### 3.2 Commonwealth Approval

The Project is considered a controlled action under the EPBC Act and is therefore subject to Commonwealth CoA's. There are no Commonwealth CoA related to bushfire risk management.

### 3.3 NSW Infrastructure Approval

The requirements of the Infrastructure Approval relevant to the development of this CBFMP are detailed in Table 3.1. These are defined as primary CoA and specifically relate to the development of the CBFMP. Secondary CoA relevant to, but not specific to the development of the CBFMP, have been listed in Appendix C. A cross reference is also included to indicate where the CoA is addressed in the CBFMP or other Project plans.

Table 3.1: Primary NSW CoA relevant to the CBFMP

No.	Requirements	Document reference
A5	Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Planning Secretary with the document. The evidence must include:	Section 1.6 Appendix A
	(a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval;	
	(b) a log of the dates of engagement or attempted engagement with the identified party;	
	(c) documentation of the follow-up with the identified party where engagement has not occurred to confirm that they do not wish to engage or have not attempted to engage after repeated invitations;	
	(d) outline of the issues raised by the identified party and how they have been addressed; and	
	(e) a description of the outstanding issues raised by the identified party and the reasons why they have not been addressed.	
C6	CEMP Sub-plans as identified in documents listed in Condition A1 must be prepared in consultation with relevant government agencies and stakeholders. Relevant government agencies and stakeholders must be nominated in the risk assessment matrix submitted to the Planning Secretary require in accordance with Condition A14 or A19. Details of all information requested by an agency during consultation must be provided to the Planning Secretary as part of any submission of the relevant CEMP Sub-plan, including copies of all correspondence from those agencies as required by Condition A5.	This CBFMP Section 1.6 Appendix A
C7	The CEMP Sub-plans must state how:	This CBFMP
	(a) the environmental performance outcomes identified in the documents listed in Condition A1 will be achieved;	Section 2.2 Section 2.3 Section 6 Section 7 Section 8
	(b) the mitigation measures identified in the documents listed in Condition A1 will be implemented;	Section 6.7
	(c) the relevant terms of this approval will be complied with; and	Table 3.1 Table 3.2 Table 6.4 Section 7 Appendix C
	(d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.	Section 5.2 Section 6.7

No.	Requirements	Document reference
C8	With the exception of any CEMP Sub-plans expressly nominated by the Planning Secretary to be endorsed by the ER, all CEMP sub-plans must be submitted to the Planning Secretary for approval. <i>Note: The Planning Secretary will consider the assessment of the predicted level of environmental risk and potential level of community concern required under Condition A14(e) when deciding whether any CEMP Sub-plans may be endorsed by the ER.</i>	Section 1.5 Appendix B
C9	The CEMP Sub-plans not requiring the Planning Secretary's approval must obtain the endorsement of the ER as being in accordance with the conditions of approval and all relevant undertakings made in the documents listed in Condition A1. Any of these CEMP Sub-plans must be submitted to the ER with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	Section 1.5 Appendix B
C10	Any of the CEMP Sub-plans to be approved by the Planning Secretary must be submitted to the Planning Secretary with, or subsequent to, the submission of the CEMP but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	Not applicable see Section 1.5 Appendix B
C11	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.	Section 1.5 Appendix B

### 3.4 Revised Environmental Management Measures

The REMMs relevant to the development of this CBFMP, defined as 'primary REMMs' are detailed in Table 3.2. A cross reference is also included to indicate where the REMM is addressed in the CBFMP or other Project plans. Secondary REMMs relevant to, but not specific to the development of the CBFMP, have been listed in Appendix C.

Table 3.2: Primary REMMs relevant to the development of the CBFMP

No.	Requirements	Timing	Document reference
BUS01	A CBFMP will be developed for the Project post-approval and will be encompassed within the CEMP. CBFMP will provide details for the ongoing management and maintenance of bushfire protection measures during the construction phase of the Project, and will encompass the provisions outlined within Section 3.4 to Section 3.8 of the BFHA (Appendix C) including:	Prior to construction	This Plan
	<ul style="list-style-type: none"> <li>APZ locations and management details (if required)</li> </ul>	Prior to construction	Section 6.2 Figure 6.1



No.	Requirements	Timing	Document reference
	<ul style="list-style-type: none"> <li>access provisions such as access locations and alternative emergency access</li> </ul>	Prior to construction	Section 6.3 Figure 6.1
	<ul style="list-style-type: none"> <li>management of potential ignition sources</li> </ul>	Prior to and during construction	Section 6.4.2 Section 6.5 Table 6.4
	<ul style="list-style-type: none"> <li>landscaping requirements including indicative design layout<sup>2</sup> and vegetation density thresholds</li> </ul>	Detailed Design and implemented during construction	Section 6.6
	<ul style="list-style-type: none"> <li>water supplies (e.g. static water supply, location of hydrants etc)</li> </ul>	Detailed Design Prior to and during construction	Section 6.1 Section 6.3 Figure 6.1
	<ul style="list-style-type: none"> <li>details regarding bushfire emergency management procedures (refer BHF263); and</li> </ul>	Prior to and during construction	Section 6.4.2
	<ul style="list-style-type: none"> <li>any other essential bushfire safety requirements.</li> </ul>	Construction	Section 6
BUS06	Consultation with RFS and Fire and Rescue NSW (FRNSW) will be undertaken during construction to ensure emergency access is maintained during and after construction.	Prior to construction	Section 1.6 Section 6.3
BUS28	<p>Where applicable and as suitable for the scale and size of the development type, emergency management procedures will be developed for the construction phase of the Project, in line with the requirements and approach of:</p> <ul style="list-style-type: none"> <li>A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014)</li> <li>Australian Standard 3745-2010 Planning for emergencies in facilities (Standards Australia, 2010).</li> </ul>	Prior to construction	Section 6.4.2

<sup>2</sup> This is a design requirement; permanent vegetation is not discussed or considered in the CBFMP

<sup>3</sup> Emergency management procedures are described within Section 3.10 on page 26 of Appendix C of the EIS

## 4 EXISTING ENVIRONMENT

### 4.1 Key References

The source of data and information used to develop this CBFMP are Section 7.3 and Appendix C of the Project EIS and Section 4.5 of the Project RtS.

Key components of the Bushfire Hazards Assessment (BHA) (Appendix C of the EIS) included:

- Mapping of bushfire prone land and compliance with Planning for Bushfire Protection (PBP) Guidelines (RFS, 2019)
- Location, extent and vegetation formation of any surrounding bushland
- Slope and aspect of any bushfire prone land
- Construction and emergency management of potential ignition sources in relation to bushfires and emergencies.

The following sections summarise existing bushfire risk within and adjacent to the Project.

### 4.2 Bushfire Risk

The Project Site is located in the Macarthur Bush Fire Management Committee (BFMC) Area which was established under the *Rural Fires Act 1997*. The Macarthur BFMC Area is located in the South Western Sydney Corridor between the Georges and Nepean Rivers and includes the Local Government Areas of Camden, Campbelltown and Liverpool Cities.

The Project Site is partially mapped as Bushfire Prone Land (Vegetation Category 1 and Buffer) on the Rural Fire Service (RFS) Bushfire Prone Land Map (see Figure 4.2). The land mapped bushfire prone is in the eastern and southern portions of the Project Site.

The bushfire hazard includes areas of forest, woodlands, heaths, forested wetlands and timber plantations. Bushfire risks associated with the Project have been assessed in accordance with the Planning for Bushfire Protection 2019 (PBP) (RFS, 2019).

The statutory Bushfire Danger Period runs from 1 October to 31 March and is the period when bushfire risk is greatest. Bushfire danger ratings are detailed in Figure 4.1 (see <http://www.rfs.nsw.gov.au/fire-information/fdr-and-tobans>).



Figure 4.1: Fire Danger Rating

### 4.2.1 Regional Bushfire Weather

The Macarthur BFMC Area has, on average, 417 bushfires per year, of which five, on average, can be considered to be major fires (Macarthur BFMC, 2012). The area experiences the following regional weather characteristics:

- A warm temperate climate
- High summer rainfalls between January and March
- Low relative humidity with little variation throughout the year
- Predominant northwest to southern winds in summer
- Warm months between November and March
- Cool, drier months between May and August.

Prevailing weather conditions associated with the bushfire season in the Macarthur BFMC are north-westerly winds accompanied by temperatures above 30 degrees Celsius and low relative humidity. The greatest period of fire danger within the Macarthur BFMC area occurs after a dry winter and spring before the onset of rain in summer. Occasional strong winds with cold fronts during summer can lead to extreme fire danger.

### 4.2.2 Vegetation Assessment and Slope

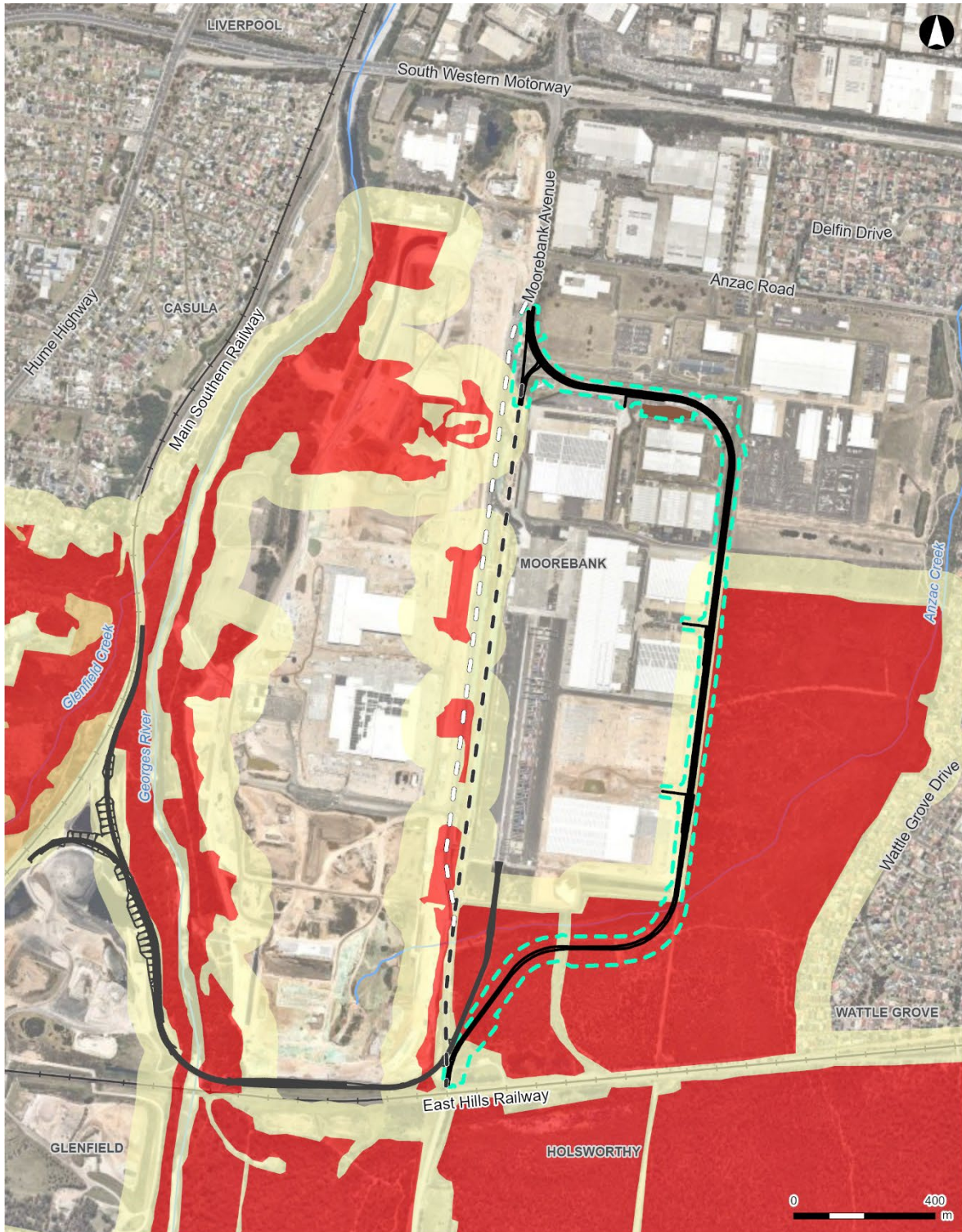
As per the PBP (RFS, 2019), the predominant vegetation classification surrounding the Project Site is classified as Grassland, Forest and Forested Wetland. The forest vegetation classification is the most prevalent of the vegetation mapped adjacent to the Project Site.

The topography within the Project Site is predominantly flat with isolated areas of steeper slopes associated with water courses and drainage lines, as well as ground disturbance related to access tracks and powerline easements.

The forest vegetation surrounding the Project Site is likely to contain four main categories of fuel:

- Compact surface layer of fine fuels and decaying leaf litter
- Elevated and relatively well aerated near surface and shrub layers
- Canopy
- Bark.

Fires in forest result in a different set of challenges for fire suppression as fuel loads in these vegetation types can be more readily available to fire, with fires burning for a longer time and producing more embers.



Legend

- Moorebank Avenue Realignment Works
- MIP Rail link
- - - Previous Moorebank Avenue
- ○ Moorebank Avenue diversion road
- Construction footprint
- Construction compound
- +— Railway
- ~ Watercourse
- Bushfire prone land
- Vegetation Buffer
- Vegetation Category 1
- Vegetation Category 2



1:16,000 at A4  
 Coordinate System: GDA 1994 MGA Zone 56  
 Date issued: March 20, 2023  
 Imagery: Nearmap



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Figure 4.2: Project Bushfire Prone Land Map (RFS, 2023)

## 5 ENVIRONMENTAL ASPECTS AND IMPACTS

### 5.1 Construction Activities

Section 2.3 of the CEMP provides an overview of the construction activities that have the potential for environmental impact. The potential risks have been identified based on the outcomes of the risk assessment provided in Appendix C of the CEMP. The potential environmental aspects and impacts associated with construction are identified in Table 4.1 of the CEMP.

Both on-site and off-site ignition sources have the potential to ignite a bushfire. A bushfire may result in significant social, economic and ecological impacts on the Project and surrounding environment. External sources of ignition sources may include:

- Deliberate and planned burning of bushland (e.g. hazard reduction burning)
- Discarded cigarette butts
- Illegal burning (arson)
- Lightning strike.

Construction activities (including the activities of construction staff) which may have the potential to cause ignition of bushfires include:

- Hot works
- Vehicle exhaust
- Idling of vehicles on vegetated areas causing heat
- Diesel generators
- Poor storage of flammable liquids (i.e. fuels) and other chemicals
- Sparks or flame sources such as grinders and welders
- Stockpiles of vegetation such as mulch (spontaneous combustion)
- Site staff/contactors incorrectly discarding cigarette butts.

The impacts of the above include:

- Increased risk to life and safety to site staff, contactors and emergency service responders, local residents and businesses
- Damage to site facilities and infrastructure, property and equipment
- Damage / destruction of environmental values and native/threatened species.

### 5.2 Cumulative Impacts

Cumulative bushfire impacts may arise from the interplay between construction activities associated with the Project, and other approved or proposed projects that are likely to occur within the area. When considered in isolation, specific impacts may be considered minor. These minor impacts may be more substantial however, when the impact of multiple projects on the same receivers is considered.

As outlined in the EIS, a multitude of other projects in the area that may coincide with construction works include:

- MPE Stage 2 (SSD 7628)
- MPW Stage 2 (SSD 7709) and Stage 3 (SSD 10431)

- M5 Motorway Westbound Traffic Upgrade
- Glenfield Waste Services Resource Recovery Facility (SSD 6249).

Cumulative bushfire impacts during construction include the potential to cause unintentional bushfires and other fires. Emergency management procedures and bushfire management are in place for the MPE and MPW sites.

Communication between the Construction Contractor and developers for these projects will be undertaken with the aim of combining messages when possible, to coordinate disruptive activities and manage and minimise cumulative impacts to the local community as per the CCS.

## 6 ENVIRONMENTAL MITIGATION AND MANAGEMENT MEASURES

### 6.1 Construction Compounds

No permanent construction of buildings will be undertaken as part of the Project. A temporary construction compound will be located in the northern vicinity of the MPE Site for the duration of construction (see Figure 1.2). The construction compound will include:

- Site offices
- Car parking
- Amenities block
- Equipment storage and laydown areas.

This compound, and any potential future ancillary compounds, temporary stockpile and laydown areas require access roads, on-site parking, and hardstand/loading areas will be located along the alignment in order to establish a defensible space (minimum of 10 metres from source) for fire-fighting purposes as well as to mitigate the potential for ignition of surrounding bushland from other sources in accordance with REMM BUS02.

A defensible space provides separation between a hazard and buildings, which in combination with other measures prevents direct flame contact and material ignition for firefighters and other emergency service personnel under critical conditions (see Figure 6.1).

The construction compound fire safety systems will be compliant in accordance with Australian Standard 3959-2018 Construction of Buildings in Bushfire-prone Areas (AS 3959-2018) and National Construction Code Class 5 to 8 buildings (which include offices, shops, factories, warehouses, public carparks and other commercial or industrial facilities) as appropriate to the building type, including some or all of the following features:

- Fire extinguishers
- Fire hose reels
- Fire hydrant systems
- Automatic sprinkler systems.

This firefighting equipment will be available and will be compliant with RFS and FRNSW fire truck and vehicles will be fitted with portable fire extinguishers. These will be maintained in accordance with Australian Standard 1851-2012 Routine Service of Fire Protection Systems and Equipment (AS 1851-2012).

The Project will connect to Liverpool City Council's water main for supply for the duration of construction. As noted above, there will be no permanent construction of buildings for the Project. In accordance with REMM BUS01, water supplies available in and around the Project Site include:

- Publicly accessible water hydrants located within the MPE site
- Sediment basins within the Project Site.

These will be available for use by firefighters if required in the case of an emergency during construction of the Project (see Figure 6.1).

The construction compound will be routinely serviced to comply with the specific requirements, as relevant to the structure type.

## 6.2 Asset Protection Zones (APZ)

There is no specific Asset Protection Zone (APZ) requirement as no vegetation is present surrounding the main construction compound under the requirements provided in the National Construction Code for Class 5 to 8 buildings. Therefore, Australian Standard 3959-2018 Construction of Buildings in Bushfire-prone Areas or the National Association of Steel Framed Housing (2014) Steel Framed Construction in Bush Fire Areas (NASH Standard) does not apply as a set of 'deemed to satisfy' provisions.

General fire safety provisions and the methodology for determining the Bushfire Attack Level (BAL) (Section 2 of AS 3959-2018) are considered acceptable solutions and has been applied to the CBFMP.

In accordance REMM BUS10, regular maintenance of overhanging branches or objects that could prevent site accessibility will be undertaken to a minimum of four metres vertical clearance. APZs and defendable space will be kept free of obstacles to enable access to RFS and FRNSW firefighting appliances and personnel.

## 6.3 Site and Emergency Access

The arrangement for site access/egress during construction onto Moorebank Avenue is addressed in Section 6.3 of the CTTMP and will vary according to the stage of the Project.

In accordance with REMM BUS07 and PBP (RFS, 2019) criteria, access roads to site offices will be suitable for firefighting appliances similar to NSW RFS category 1 tankers. The applicable considerations include:

- Traffic management devices will not prohibit access by emergency services vehicles
- All roads are through roads, if unavoidable, are not more than 200 metres in length, incorporate a minimum 12 metres outer radius turning circle, and are clearly sign posted as a dead end
- One way only public access roads are no less than 3.5 metres wide and have designated parking bays with hydrants located outside of these areas to ensure accessibility to reticulated water for fire suppression
- The capacity of perimeter and non-perimeter road surfaces and any bridges/causeways are sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes)
- Bridges/ causeways are to clearly indicate load rating
- Hydrants are located outside of parking reserves and road carriageways to ensure accessibility to reticulated water for fire suppression
- Hydrants are provided in accordance with the AS 2419.1:2005 – Fire hydrant installations System design, installation and commissioning
- Suitable access for a Category 1 fire appliance to within four metres of the static water supply where no reticulated supply is available.

Defendable space, a minimum of 10 metres between hazard and buildings, has been identified in Figure 6.1. The Construction Contractor will consider the defendable space in the final construction compound layout.

The Project Site and construction compound will initially be accessed via the existing signalised intersection of Moorebank Avenue and the DJLU access road. Once vehicles have entered the site, heavy vehicles will travel along the Project Site which generally runs north/south.

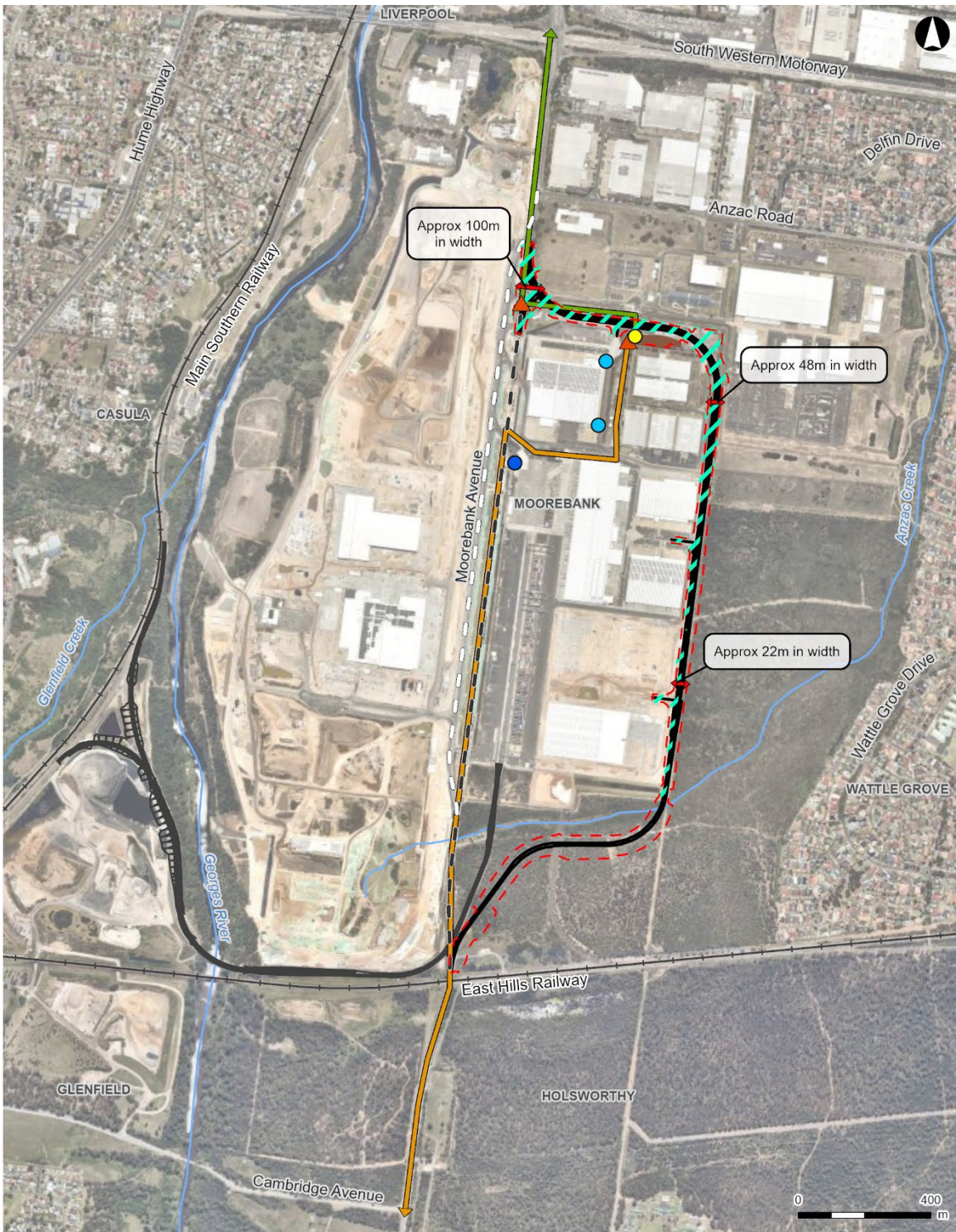
The primary evacuation route will be via the existing Moorebank Avenue and DJLU access road, north towards the M5 Motorway. The secondary (alternate evacuation route) extends south to the internal MPE



site access road and south onto Moorebank Avenue. Emergency and bushfire response procedures are further detailed in Section 6.4. Emergency access, emergency assembly points, water hydrants and evacuation routes are detailed in the Figure 6.1.

The Construction Contractor will implement signposting and ensure emergency access for emergency vehicles is maintained. If access to properties or traffic routes will be impeded, the Construction Contractor will notify emergency services providers when is expected and for any period of time in accordance with REMM BUS06 and REMM BUS13.

Access roads and tracks within the Project Site will be inspected annually for erosion, fallen timber, locked gates, and dead-end tracks as per REMM BUS08. Management actions will be undertaken if roads and tracks are considered unsuitable for emergency vehicle passage.



Legend

- |                                      |                                |                              |
|--------------------------------------|--------------------------------|------------------------------|
| — Moorebank Avenue Realignment Works | ■ Construction compound        | ● Assembly points            |
| — MIP Rail link                      | ▨ DefendableSpace              | ▲ Site access                |
| - - Previous Moorebank Avenue        | — Railway                      | Evacuation routes            |
| ○ Moorebank Avenue diversion road    | ~ Watercourse                  | → Primary evacuation route   |
| - - - Construction footprint         | ● Water hydrant                | → Secondary evacuation route |
|                                      | ● Main booster fire water tank |                              |



1:17,000 at A4  
 Coordinate System: GDA2020 MGA Zone 56  
 Date issued: March 20, 2023  
 Imagery: Nearmap  
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Figure 6.1: Assembly Points and Evacuation Route

## 6.4 Bushfire and Emergency Response

### 6.4.1 Bushfire Alerts

Fire danger days (i.e. high or greater) will trigger response to act accordingly to the three levels of alert under the national bushfire warning system (Advice, Watch and Act, Emergency Warning) made available through the RFS (<http://www.rfs.nsw.gov.au/fire-information/fdr-and-tobans>).

The Bureau of Meteorology (BOM) also issue fire weather warnings when weather conditions are conducive to the spread of dangerous bushfires. Warnings are generally issued within 24 hours of the potential onset of hazardous conditions. Warnings are also broadcast on radio and television. However, the BOM does not have the power to declare a total fire ban. This responsibility resides with the NSW RFS.

Staff, contractors, and visitors will be made aware of fire weather warnings, extreme weather warnings and total fire bans during daily site meetings. Hot works permit will be obtained for all hot works activities; no hot works will be permitted during extreme fire risk or on total fire ban days.

### 6.4.2 Bushfire Response

In accordance with REMM BUS28, emergency management procedures will be developed by the Construction Contractor which will detail bushfire and emergency management in accordance with the following guidelines:

- A Guide to Developing a Bushfire Emergency Management and Evacuation Plan (NSW RFS, 2014)
- Australian Standard 3745-2010 Planning for emergencies in facilities (AS 3745-2010).

Prior to the commencement of the Bushfire Danger Period, the following will occur:

- Where possible, formal meetings will be arranged by the Construction Contractor in collaboration with Principal's Representative. This will be conducted with relevant stakeholders prior to the bushfire season, when higher fire weather is forecast or there are fire events in the surrounding area and be undertaken in accordance with the procedures outlined in the CCS. Potential participants to include relevant staff, contractors, neighbouring community representatives and external fire authorities and land managers (e.g. RFS and FRNSW).
- The Construction Contractor will develop and implement an Employee Listing Register to identify employees present on site each day
- All personnel are trained in accordance with this CBFMP and have reviewed the CBFMP
- All personnel are informed of the sheltering procedures
- The compounds and areas around the compound will be maintained and visibly signed
- Conduct practice fire sheltering drills
- Firefighting equipment (fire extinguishers, hoses etc.) are serviceable and available
- Update contact details of all personnel
- Contact and update emergency services, RFS and FRNSW with the premises' contact details, security clearances, communication and access arrangements
- Monitor Fire Danger Ratings for the area
- Stay alert for warnings and watch for signs of fire.

Indicative options for bushfire response are detailed in the following sections; these are to be further refined by the Construction Contractor as detailed above.

### 6.4.2.1 Sheltering

Relocation of employees on the Project Site (sheltering) will be implemented in the first instance unless it is deemed unsafe to remain on site. The construction compound will have a designated assembly point that all personnel will relocate to in the event of a bushfire.

The assembly points are shown below in Figure 6.1. In the event that an assembly point is deemed unsafe by the Chief Warden, the Chief Warden will arrange an alternative assembly point (i.e. another construction compound located in the MPE site) (Table 6.1).

Table 6.1: Sheltering Procedure

Trigger	Action
Bushfire in the surrounding area	<ul style="list-style-type: none"> <li>Consult the NSW RFS website, 1800 NSW RFS, smart phone applications and local firefighting resources for fire situation and updates</li> <li>Inform personnel of the fire situation</li> <li>Ensure that the Chief Warden has a mobile phone and is contactable</li> <li>Advise the local emergency services that the Project is operating, and that it will need to be advised early in the event of an evacuation being necessary.</li> </ul>
Approaching bushfire threatening the Project Site	<ul style="list-style-type: none"> <li>After consultation with emergency services, temporarily cease construction works and 'shelter in place'</li> <li>Alert all personnel of 'shelter in place'</li> <li>All personnel to move to assembly points</li> <li>Conduct a check of all personnel using the Employee Listing sheet</li> <li>Keep personnel hydrated</li> <li>Assemble persons away from part of the compound which will be initially exposed to fire</li> <li>Monitor bushfire situation and the Chief Warden is to stay contactable at all times</li> <li>When the fire or threat has passed, all personnel are to remain at assembly points until further directed.</li> </ul>

After the bushfire event:

- Chief Warden, in consultation with emergency services, will determine when the construction works will re-commence and will advise all persons
- Update Employee Listing Sheet
- Confirm with Fire and Rescue NSW that utilities (water, gas and electricity) are safe to use
- Review the Project Site
- Undertake a debrief with key personnel
- Review the CBFMP and amend if required.

### 6.4.2.2 Evacuation

Where it is deemed unsafe for staff to remain sheltered onsite at the assembly points and is safe to evacuate the Project Site, staff will be instructed by emergency authorities or relative emergency management representatives to individually relocate to their own personal refuge (personal residences). Staff will be responsible for their own transport, and it is advised that staff travel 800 metres north towards the intersection of Moorebank Avenue and the M5 Motorway when exiting the site from the construction site access point.

If the northern site access is blocked (i.e. a bushfire from the north or car accident), staff will be advised to travel 1.5 kilometres south towards the East Hills Railway (if safe to do so) when exiting the site onto Cambridge Avenue that leads onto Campbelltown Road and towards the Hume Highway. Table 6.2 details the evacuation procedure.

Table 6.2: Evacuation Procedure

Trigger	Action
Bushfire in the surrounding area	<ul style="list-style-type: none"> <li>Consult the NSW RFS website, 1800 NSW RFS, smart phone applications and local firefighting resources for fire situation and updates</li> <li>Inform personnel of the fire situation</li> <li>Ensure that the Chief Warden has a mobile phone and is contactable</li> <li>Advise the local emergency services that the site is operating, and that it will need to be advised early in the event of an evacuation being necessary</li> <li>Continue to monitor the situation.</li> </ul>
Approaching bushfire threatening the Project Site	<ul style="list-style-type: none"> <li>After consultation with emergency services, cease construction and commence evacuation procedures • Alert personnel of evacuation</li> <li>Meet at designated assembly point</li> <li>Designated Chief Warden will take control of the situation</li> <li>Ensure all persons are accounted for (using employee register).</li> <li>The Chief Warden is to advise the local emergency service (02 9603 7077) that the centre is currently sheltering-in-place at assembly point (include how many people and location)</li> <li>Early departure of all occupants to relocate well before the fire fighting units arrive to avoid site traffic</li> <li>Maintain situational awareness through radio, NSW RFS website, 1800 NSW RFS, smart phone applications and local firefighting resources</li> </ul>
Evacuation	<ul style="list-style-type: none"> <li>The Chief Warden is to advise the local emergency service (02 9603 7077) that the centre is being evacuated (include how many people and where they are going)</li> <li>Move all persons to the assembly point for evacuation</li> <li>Arrange for personnel to evacuate the site in personal vehicles from the site access point.</li> <li>Ensure all persons are accounted for prior to departure (using employee register)</li> </ul>

After the bush fire event:

- No person should re-enter any evacuated site until advised by the emergency service that the area is deemed safe
- Review the Project Site
- Chief Warden is to coordinate the movement of personnel back to the Project Site
- All personnel are to be accounted for on their return
- Inform the police / emergency service of the return of persons to the premises
- Undertake debrief with stakeholders (i.e. RFS and/or FRNSW)
- Review and amend the CBFMP.

### 6.4.3 Emergency Contacts

Project emergency contact numbers are listed in Table 6.3. The site contact details will be confirmed following the appointment of a Construction Contractor prior to the commencement of construction.

The closest FRNSW station is located on Anzac Road, Moorebank, approximately 1.2 kilometres from the construction site access point. The second closest is located on Cartwright Avenue, Busby, approximately 7.6 kilometres from the construction site access point.

Table 6.3: Emergency contacts

Name of Organisation	Details	Phone Number
NSW Rural Fire Service	Local Fire Control Centre (Liverpool)	02 9608 7777
	Address	Corner Alderney St and Townson Ave, Minto 2566
	Bushfire Information Line	1800 679 737 1800 NSW RFS
	Rural Fire Service Headquarters	02 8741 5555
	Website	<a href="http://www.rfs.nsw.gov.au">www.rfs.nsw.gov.au</a>
Fire and Rescue NSW Ambulance NSW Police Force	Fire and Rescue Ambulance Police Emergency Services General	000
	Website	<a href="http://www.police.nsw.gov.au">www.police.nsw.gov.au</a>
NSW State Emergency Service	General enquiries	02 4251 6111
Liverpool City Council	Customer Contact Centre	1300 362 170
	National Relay Service (NRS) for hearing and speech impaired customers	1800 555 660
	Address	Ground Floor, 33 Moore St, Liverpool NSW 2170
Liverpool Hospital	Contact	8738 3000
	Address	Corner of Elizabeth and Goulburn Streets, Liverpool, NSW 2170
Environment Line	Contact	131 555
Ministry of Health	Contact	(02) 9391 9000
WorkCover	Contact	13 10 50
Site Contacts	Proponent Representative	To be confirmed
	Contractor Project Manager	To be confirmed
	Contractor Construction Manager	To be confirmed
	Contractor Environment Manager	To be confirmed
	Contractor Health and Safety Manager	To be confirmed

Name of Organisation	Details	Phone Number
Other site stakeholders	Logos	To be confirmed
	Qube	To be confirmed
National Intermodal	Hotline	To be confirmed

## 6.5 Plant, Hazardous Material and Equipment Storage

Diesel generators and associated fuel storage tanks will be designed, housed, and maintained so as not serve as an unacceptable risk to surrounding bushland. Hazardous materials, diesel generators and associated fuel storage tanks will be located away from potential sources of ignition wherever possible in accordance with REMM BUS16. Potentially flammable liquids (e.g. fuel and chemicals) will be stored and handled in accordance with relevant guidelines.

The Construction Contractor will be responsible for maintaining all plant and equipment are in good working order ensuring plant and equipment are fitted with appropriate spark arrestors, limit vehicle movement over long grass and vehicles are provided with portable fire extinguishers compliant with relevant Australian Standards, where practical.

## 6.6 Landscaping

Landscaping design will be progressed during detailed design and implemented during construction of the Project. Landscaping will be designed such that it would not adversely impact on the ongoing revegetation and rehabilitation of the adjacent Wattle Grove Offset Area (see Figure 1.2). The following will be considered within the detailed design to minimise potential bushfire risk:

- Appropriate landscaping will be selected to maintain a low surface fuel environment
- Landscape species selection shall be drawn from those that are considered to be species which are “fire retardant” and do not promulgate the spread of fire and shrubs shall be placed so that they are clear of any buildings in MPE Stage 2 by at least five metres
- The use of flammable mulch in garden beds will be avoided
- Where trees are proposed, separate and maintain tree crowns by at least two metres so that the canopy is not continuous and does not encroach closer than five metres to the buildings in MPE Stage 2
- Low tree branches will be pruned to two metres from the ground to prevent a ground fire from spreading into the tree canopy (note this is four metres for site access as detailed in the CBFMP)
- Plant and maintain short green grass to slow any potential bushfire and reduce fire intensity.

The indicative design layout will be included within this CBFMP once available, as a minor update to the CBFMP.

## 6.7 Management Measures

Management actions prescribed by this CBFMP aim to avoid and minimise impacts for bushfire risk are summarised in Table 6.4.

The development of management measures has been based on SMART principles i.e. measures that are specific, measurable, achievable, relevant, and time-bound:

- **Specific** – Mitigation and management measures identified in Table 6.4 specifically to bushfire risk impacts during construction
- **Measurable** – Inspection and monitoring requirements detailed in Section 7.3 include specific measures or indicators for which inspection and monitoring requirements will be triggered
- **Achievable** – Ongoing compliance with the Infrastructure Approval (Table 3.1), is achievable throughout the delivery of construction and represents the minimum requirements to be implemented by the Construction Contractor
- **Relevant** - The management measures outlined in Table 6.4 represent the approach to monitoring and tracking against the objectives, targets and environmental performance outcomes (identified in Section 2 of the CBFMP)
- **Time-bound** – The management measures set out within Table 6.4 are required to be implemented for the duration of construction, setting a clear and defined time frame and includes reference to other timeframes, including during detailed design, pre-construction, post-construction and/or operation.



Table 6.4: Bushfire management and mitigation measures

ID	Measure / Requirement	Timing	Responsibility	Reference	Evidence
<b>General</b>					
BF01	All relevant staff will be required to undergo staff/site inductions, toolbox talks and pre-commencement meetings that will include bushfire awareness and safety and emergency procedures including smoking areas and putting rubbish in designated bins.	Prior to working onsite	Construction Contractor Health and Safety Manager	REMM BUS20 REMM BUS30	Induction records Toolbox Pre-commencement meetings
BF02	The Construction Contractor will actively engage in, and maintain, on-going consultation with Rural Fire Service (RFS) and Fire and Rescue NSW (FRNSW) to ensure security clearances and access arrangements are communicated on a regular basis.	During construction	Construction Contractor	NSW CoA A5 REMM BUS06 REMM BUS13	Consultation management system
BF03	Meetings will be conducted with relevant stakeholders prior to the bushfire season, when higher fire weather is forecast or there are fire events in the surrounding area. Potential participants to include staff, contractors, neighbouring community representatives and external fire authorities and land managers (e.g. RFS and FRNSW).	During construction	Principals Representative Construction Contractor Construction Contractor Environmental Advisor Construction Contractor Health and Safety Manager	REMM BUS32	Induction records
<b>Construction Activities</b>					
BF04	Hot works permit will be obtained for all hot works activities; no hot works will be permitted during extreme fire risk or on total fire ban days.	During construction	Construction Contractor	REMM BUS21	Hot Works Permit
BF05	Diesel generators and associated fuel storage tanks (Hazardous Materials) will be designed, housed, maintained and will be located away from hazards.	Prior to commencement of construction	Construction Contractor Site Supervisor	REMM BUS15 REMM BUS16	Weekly inspections
BF06	Plant and equipment will be maintained in good working order and will be fitted with appropriate guards to minimise potential for sparks causing accidental ignition, where practical.	During construction	Construction Contractor	REMM BUS17 REMM BUS18	Weekly inspections

ID	Measure / Requirement	Timing	Responsibility	Reference	Evidence
BF07	Temporary construction compounds will be fully compliant with fire safety system in accordance with Australian Standard 3959-2018 Construction of Buildings in Bushfire-prone Areas and National Construction Code. The fire safety equipment will be routinely serviced to comply with specific requirements.	Prior to commencement of construction	Construction Contractor	REMM BUS02 REMM BUS26	Safety tagging and testing
BF09	Firefighting equipment will be made available at designated locations in site offices and within site vehicles. These will be maintained in accordance with Australian Standard 1851-2012.	During construction	Construction Contractor	REMM BUS19	Safety tagging and testing
BF10	Firefighting pumps and water sources will be maintained and inspected to ensure good working order, and all fittings are compatible with RFS and FRNSW fire trucks and clearly marked and easy to locate. Pumps and water sources will be clearly marked and easy to find.	During construction	Construction Contractor Construction Manager	REMM BUS11 REMM BUS12	Safety tagging and testing Emergency management procedures Weekly inspections
BF11	Stockpiles of mulch will be maintained and turned regularly to minimise potential for spontaneous combustion.	During construction	Construction Contractor Environmental Advisor Site Supervisor	PBP 2019	Weekly inspections
<b>Site Access</b>					
BF12	The emergency assembly point and evacuation routes will be clearly signposted, communicated and maintained.	During construction	Construction Contractor Traffic Manager Site Supervisor	REMM BUS02	Figure 6.1
BF13	Emergency services access to bushfire prone land will be adequately maintained at all times.	During construction	Construction Contractor Site Supervisor	REMM BUS02	Figure 6.1 Weekly inspections Emergency management procedures

ID	Measure / Requirement	Timing	Responsibility	Reference	Evidence
BF14	All site offices, temporary stockpiles, laydown areas, and handstand areas will be accessible via access roads suitable for firefighting appliances similar to NSW RFS category 1 tankers.	During construction	Construction Contractor Construction Manager	REMM BUS02 REMM BUS07	Emergency management procedures
BF15	Access roads will be well maintained and inspected for erosion, fallen timber, locked gates and dead-end tracks) on an annual basis to ensure that firefighting access is adequate.	During construction	Construction Contractor Construction Manager	REMM BUS02 REMM BUS08	Emergency management procedures
BF16	Gates will be kept in good condition for entry and exit of fire fighting vehicles.	During construction	Construction Contractor Site Supervisor	REMM BUS09	Weekly inspections
BF17	A minimum of four metres vertical clearance will be maintained through the removal of overhanging branches or objects that will prevent access within the Project Site.	During construction	Construction Contractor Construction Manager	REMM BUS10	Weekly inspections
<b>Emergency Response</b>					
BF18	Emergency management procedures will be prepared and implemented during the construction phase of the Project in accordance with the following guidelines: <ul style="list-style-type: none"> <li>• A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014); and</li> <li>• Australian Standard 3745-2010 Planning for emergencies in facilities (Standards Australia, 2010).</li> </ul>	Prior to the commencement of construction  During construction	Construction Contractor Construction Manager	REMM BUS01 REMM BUS28	Emergency management procedures
BF19	Emergency services will be immediately notified of the location and nature of any accidental ignition of surrounding vegetation and/or structures, that was unable to be successfully extinguished.	During construction	Principals Representative Construction Contractor Site Supervisor Chief Warden	REMM BUS23	Emergency management procedures

ID	Measure / Requirement	Timing	Responsibility	Reference	Evidence
BF20	In the event of an unplanned fire, the Construction Contractor (in consultation with the Principals Representative) will assist RFS/FRNSW in the investigation and cause of any unplanned fires.	Following an unplanned fire event	Principals Representative Construction Contractor	REMM BUS24	Emergency management procedures
BF21	Emergency management procedures will be reviewed following a bushfire incident or other fires as well as at the end of bushfire season to amend and improve the effectiveness of the Plan.	During construction	Construction Contractor Construction Manager	REMM BUS29	Emergency management procedures
<b>Bushfire Management</b>					
BF22	APZs and/or defendable space will be easily accessible for RFS and FRNSW fire-fighting appliances and personnel.	During construction	Construction Contractor Construction Manager	REMM BUS14	Figure 6.1 Emergency management procedures
BF23	Fire weather warnings, extreme weather warnings and total fire bans will be communicated daily during the bushfire danger season to all staff, contractors, and visitors at the Project via the RFS website Information can be found on the fire information page (Fire danger ratings and total fire bans) of the RFS website.	During construction	Construction Contractor Construction Contractor Environmental Advisor Site Supervisor	REMM BUS33	Pre-start meetings
BF24	The recognition of high <sup>4</sup> or greater fire danger days will be used as a requirement to view the fire information page (Fires Near Me, Major fire updates) on the RFS website (NSW RFS 2020). A stop works order will be implemented if hot works activities are being undertaken.	During construction	Construction Contractor Construction Contractor Health and Safety Manager Site Supervisor	REMM BUS34	Induction records Pre-start meetings

---

<sup>4</sup> Figure danger ratings have been updated since development of the EIS; this document now refers to the new fire danger ratings as shown in Figure 4.1.

ID	Measure / Requirement	Timing	Responsibility	Reference	Evidence
BF25	Staff, contractors, and visitors will be made aware of and required to respond accordingly to the three levels of alert under the national bushfire warning system (Advice, Watch and Alert, Emergency Warning).	During construction	Construction Contractor Construction Contractor Health and Safety Manager Site Supervisor	REMM BUS35	Induction records Pre-start meetings

## 7 COMPLIANCE MANAGEMENT

### 7.1 Roles and responsibilities

The Project organisational structure and overall roles and environmental responsibilities are outlined in Section 5.1 of the CEMP. Specific responsibilities for the implementation of bushfire and emergency management are detailed in Section 6.7 of this CBFMP.

### 7.2 Training

All relevant site personnel (including sub-Construction Contractors) will undergo site induction training relating to bushfire awareness and safety prior to work being undertaken onsite. The induction training will address elements related to bushfire risk management, including:

- Existence and requirements of this CBFMP
- Relevant legislation and regulations
- Incident response, management and reporting
- Environmentally sensitive locations and exclusion zones
- All requirements of appendices contained within this CBFMP
- Emergency procedures in the case of a bushfire and other incidental fires
- Toolbox talks on bushfires and emergency response
- Storage of flammable liquids (i.e. fuel) and chemicals
- Hot day (e.g. extreme fire danger days and higher) management, obtaining hot works permits and no hot works days
- Site rules that cover designated smoking areas on site and disposal of rubbish in designated bins.

Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in bushfire management or those undertaking an activity with a high risk of environmental impact. Site personnel will undergo refresher training at not less than six monthly intervals.

Daily pre-start meetings conducted by the Construction Contractor Site Supervisor will inform the site workforce of any environmental issues relevant to bushfire that could potentially be impacted by, or impact on, the day's activities.

Further details regarding staff induction and training are provided in Section 5.2 of the CEMP.

### 7.3 Monitoring and Inspections

Inspections of sensitive areas and activities with the potential bushfire impacts will occur for the duration of construction phase of the Project.

Requirements and responsibilities in relation to monitoring and inspections are documented in Section 7.1 of the CEMP.

Bushfire-specific inspection requirements include:

- Annual inspection of all access roads and tracks internal to the Project Site in accordance with REMM BUS08
- Ongoing maintenance to ensure a minimum four metres vertical clearance through the removal of overhanging branches or objects that will prevent access within the Project Site in accordance with REMM BUS10.

## 7.4 Auditing

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this Plan, State and Commonwealth CoA and other relevant approvals, licenses and guidelines.

Audit requirements are detailed in Section 7.3 of the CEMP.

## 7.5 Reporting and Identified Records

Reporting requirements and responsibilities are documented in Section 7.4 of the CEMP.

Specific reporting requirements associated with the CBFMP are outlined in Table 7.1.

*Table 7.1: Reporting requirements relevant to bushfire management*

Report	Frequency	Responsibility
Bushfire and emergency management procedures	Annually following bushfire season (e.g. April – May)	Construction Contractor

The Construction Contractor will be required to maintain accurate records substantiating all construction activities associated with the Project or relevant to the State and Commonwealth CoA, including measures taken to implement this CBFMP. Records will be made available to the DPE and Department of Climate Change, Energy, Environment and Water (DCCEEW), NSW RFS and FRNSW upon request, within the timeframe nominated in the request.

## 7.6 Incidents

Emergency services will be immediately notified of the location and any accidental ignition of surrounding vegetation and/or structures that cannot be successfully extinguished. The Construction Contractor will assist RFS/FRNSW in the investigation of the cause of any unplanned fires in proximity to the Project Site. It is the responsibility of all personnel to report any incident in accordance with the incident management procedures detailed to Section 6.1 of the CEMP.

## 7.7 Complaints

Complaints will be managed as soon as possible in accordance with the requirements of the CCS and Complaints Management System (CMS) developed in accordance with NSW CoA B7 and B8 respectively.

Complaints will be managed in accordance with Section 5.4.3 of the CEMP and CCS.

## 7.8 Non-Compliances and Corrective Actions

Non-compliance may be identified via internal and external audits, site monitoring, inspections and observations, environmental incidents and emergencies, complaints and management reviews.

Non-compliance and resulting corrective actions will be managed in accordance with Section 7.2 of the CEMP.



## 8 REVIEW AND IMPROVEMENT

### 8.1 Continuous improvement

Continuous improvement of this Plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement and through SMART principles. The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance
- Determine the cause or causes of non-compliances and deficiencies
- Develop and implement a plan of corrective and preventative action to address any non-compliances and deficiencies
- Verify the effectiveness of the corrective and preventative actions
- Document any changes in procedures resulting from process improvement
- Make comparisons with objectives and targets.

Project environmental risks will be identified and included in the risk register and appropriate mitigation measures implemented throughout the construction of the Project as part of the continuous improvement process.

The process for ongoing risk identification and management during construction is outlined in Section 4.2 and Appendix C of the CEMP.

### 8.2 CBFMP Update and Amendment

The processes described in Section 7.5 of the CEMP may result in the need to update or revise the CBFMP. Emergency management procedures will be reviewed after incidents of bushfire or other fires as well as annually at the end of each bushfire season and amended, if required, to improve the effectiveness of the plan.

Any revisions to the CBFMP will be endorsed and/or approved in accordance with the process outlined in Section 1.5 of the CEMP.

A copy of the updated CBFMP and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure.

## APPENDIX A Consultation



File Ref. No: FRN21/943 BFS23/1492 8000027167  
TRIM Doc. No: D23/29657  
Contact: Station Officer Luke Loseby

10 April 2023

HEATHER TILLEY  
C/O NSW Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Heather,

**Re: Advice on Post Approval Matter - MOOREBANK AVENUE REALIGNMENT (SSI-10053-PA-21)**

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 23 March 2023, requesting FRNSW provide consultation on the Construction Bushfire Management Plan (CBFMP) for MOOREBANK AVENUE REALIGNMENT (SSI-10053-PA-21).

It is deemed that the proposal has limited scope and application in regard to special hazards or special problems of firefighting. FRNSW submit no comments or recommendations for consideration, nor any requirements beyond that specified by applicable legislation.

Proponents of projects that require engagement with FRNSW on Post Approval Matters are required to engage directly with FRNSW. If a written response from FRNSW regarding this matter is required, this can be done by completing the [FRNSW written report application](#) form and sending to [FireSafety@fire.nsw.gov.au](mailto:FireSafety@fire.nsw.gov.au). Further details can be found on our internet page at <https://www.fire.nsw.gov.au/page.php?id=9156>.

For further information please contact the Operational Liaison and Special Hazards Unit, referencing FRNSW file number BFS23/1492. Please ensure that all correspondence in relation to this matter is submitted electronically to [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read "James O'Carroll".

Superintendent James O'Carroll  
Manager  
Operational Liaison and Special Hazards Unit

---

**From:** Fire Safety <FireSafety@fire.nsw.gov.au>

**Sent:** Monday, 27 March 2023 10:25 AM

**To:** Kylie Hargreaves [REDACTED]

**Subject:** Acknowledgement of Application - Major Projects – Proponent Request for Advice - Moorebank Avenue Realignment - Construction Traffic Management Management Plan (SSI-10053-PA-21) (Liverpool City)

Good Morning Kylie,

Fire & Rescue NSW acknowledge receipt of your application - Major Projects – Proponent Request for Advice - Moorebank Avenue Realignment - Construction Traffic Management Management Plan (SSI-10053-PA-21) (Liverpool City).

For any future correspondence regarding this matter, we request that you quote your job / reference number:

Project Reference:	FRN21/943
Job Number:	BFS23/1499
SRID:	8000027172

Should you have any question regarding this matter, please contact us here at Fire Safety.

Regards,



**Samantha Cavanagh**  
Administrative Support Officer  
CSD Admin & Project Services | Fire and Rescue NSW

[REDACTED] | E: [firesafety@fire.nsw.gov.au](mailto:firesafety@fire.nsw.gov.au)

1 Amarina Ave, Greenacre, NSW 2190 | Locked Bag 12, Greenacre, NSW 2190

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**PREPARED FOR ANYTHING.**

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**From:** [no-reply@majorprojects.planning.nsw.gov.au](mailto:no-reply@majorprojects.planning.nsw.gov.au) <[no-reply@majorprojects.planning.nsw.gov.au](mailto:no-reply@majorprojects.planning.nsw.gov.au)>

**Sent:** Friday, March 24, 2023 4:27 PM

**To:** Fire Safety <FireSafety@fire.nsw.gov.au>; Operational Liaison <OpsLiaison@fire.nsw.gov.au>

**Subject:** CM: Major Projects – Proponent Request for Advice - Moorebank Avenue Realignment - Construction Traffic Management Management Plan (SSI-10053-PA-21) (Liverpool City)

**CAUTION:** This email originated from outside of Fire and Rescue NSW. Do not click links or open attachments unless you recognise the sender and know the content is safe.

A proponent is requesting advice in relation to a post approval matter for the Moorebank Avenue Realignment.

Please sign in to your account to view the details of this request and to upload your advice.

If you have any enquiries about this request, you can contact Kylie Hargreaves at [REDACTED]

To sign in to your account click [here](#) or visit the [Major Projects Website](#).

Please do not reply to this email.

Kind regards

The Department of Planning and Environment



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This message has been scanned for viruses.

---

**From:** [Oyston, Samantha](#)  
**To:** [REDACTED]  
**Cc:** "[Gail Hall](#)"; [Patel, Ketan](#); "[Westley Owers](#)"  
**Subject:** RE: Moorebank Avenue Realignment - Construction Management Plans  
**Date:** Friday, 24 March 2023 5:05:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.jpg](#)

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Apologies for my second email, in addition to the Construction Bushfire Management Plan, the Construction Traffic and Transport Plan has also been uploaded to the DPE portal for RFS review. Consultation closes Thursday, 20 April 2023.

**Samantha Oyston** | Senior Environmental Consultant  
Arcadis | [REDACTED]  
[www.arcadis.com](http://www.arcadis.com)

---

**From:** Oyston, Samantha  
**Sent:** Friday, 24 March 2023 5:03 PM  
**To:** [REDACTED]  
**Cc:** Gail Hall [REDACTED] Patel, Ketan [REDACTED]  
Westley Owers [REDACTED]  
**Subject:** FW: Moorebank Avenue Realignment - Construction Management Plans

Hi,

This is a courtesy email to let you know that the Construction Bushfire Management Plan has been uploaded to the DPE portal for RFS review. Consultation closes Thursday, 20 April 2023.

Could you also please confirm if RFS would like to review the landscape design plan including design layout and vegetation once detailed design is complete? And how RFS would like to be informed and updated about the Site (i.e. final design layout including water hydrants sources/water pumps/water sources), progressively or only in the case of the event of a fire?

Warm Regards,

**Samantha Oyston** | Senior Environmental Consultant  
Arcadis | [REDACTED]  
[www.arcadis.com](http://www.arcadis.com)

---

**From:** Kimberley Tadic [REDACTED]  
**Sent:** Tuesday, 10 January 2023 10:55 AM  
**To:** Oyston, Samantha [REDACTED]  
**Subject:** RE: Moorebank Avenue Realignment - Construction Management Plans

You don't often get email from [REDACTED] [Learn why this is important](#)

Good Morning Samantha,

Thank you for your email.

Please contact the local Fire Control Centre at Macarthur [REDACTED] who may be able to review the management plan.

Kind regards,

**Kimberley Tadic** | Administration Officer | Planning and Environment Services - East  
**NSW RURAL FIRE SERVICE**

---

**From:** Oyston, Samantha [REDACTED]  
**Sent:** Thursday, 22 December 2022 3:57 PM  
**To:** Records [REDACTED] Luke Robinson [REDACTED]  
**Cc:** Jamie Crawford [REDACTED] Gail Hall  
[REDACTED] Patel, Ketan [REDACTED]  
**Subject:** Moorebank Avenue Realignment - Construction Management Plans

Hello,

Arcadis are currently developing the Construction Environmental Management Plan and Associated Sub-plans for the Moorebank Avenue Realignment Works (SSI-10053) on behalf of the National Intermodal Corporation.

The Project involves the realignment of an existing section of Moorebank Avenue, from a point approximately 130 meters south of the Anzac Road/Moorebank Avenue intersection to a point immediately north of the East Hills Railway. Moorebank Avenue currently divides the Moorebank Logistic Park. The key features of the Project include:

- Construction of approximately three kilometres of new road to bypass the MLP to the east, comprising:
  - A four-lane road (two lanes in each direction) near Moorebank Precinct East (MPE), commencing from a point approximately 130 metres south of the Anzac Road / Moorebank Avenue intersection to the south-eastern corner of the MPE site
  - A two-lane road (one lane in each direction) from the south-eastern corner of the MPE site to a point immediately north of the bridge over the East Hills railway
- Northern tie-in to the existing Moorebank Avenue, 130 meters south of the Anzac Road/Moorebank Avenue for a distance of 250 metres to the northwest corner of the MPE site.
- Construction of four accesses with signalised intersections between the new road and the MLP
- Construction of a central median, typically six metres wide, tapering to zero width where the new road becomes two lanes
- Southern tie-in to the existing Moorebank Avenue, 17 metres before the East Hills railway over bridge. No work will be undertaken or impact the East Hills over bridge

At the completion and commissioning of the realigned road section, the public through traffic using Moorebank Avenue will be redirected onto the new alignment. The existing road alignment will be decommissioned and modified to function as a restricted access to the Moorebank Logistic Park.

We are aiming to send the Bushfire Management Plan for NSW Rural Fire Service review during the week commencing of 6 February 2023.

Warm Regards,

**Samantha Oyston (she/her)** MRes, BEnv  
Senior Environmental Consultant  
Arcadis Australia Pacific

Level 16, 580 George Street, Sydney | NSW 2000 | Australia



[www.arcadis.com](http://www.arcadis.com)

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**From:** [Oyston, Samantha](#)  
**To:** [Fire Safety](#)  
**Cc:** [Westley Owers](#); [Gail Hall](#); [Patel, Ketan](#)  
**Subject:** RE: ATTN: John Hawes; Moorebank Avenue Realignment - Construction Management Plans  
**Date:** Friday, 24 March 2023 5:05:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
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[image011.png](#)  
[image012.jpg](#)

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Apologies for my second email, in addition to the Construction Bushfire Management Plan, the Construction Traffic and Transport Plan has also been uploaded to the DPE portal for Fire and Rescue review. Consultation closes Thursday, 20 April 2023.

**Samantha Oyston** | Senior Environmental Consultant  
Arcadis | [REDACTED]  
[www.arcadis.com](http://www.arcadis.com)

---

**From:** Oyston, Samantha  
**Sent:** Friday, 24 March 2023 5:00 PM  
**To:** Fire Safety <FireSafety@fire.nsw.gov.au>  
**Cc:** Westley Owers [REDACTED] Gail Hall  
[REDACTED] Patel, Ketan [REDACTED]  
**Subject:** RE: ATTN: John Hawes; Moorebank Avenue Realignment - Construction Management Plans

Hi

This is a courtesy email to let you know that the Construction Bushfire Management Plan has been uploaded to the DPE portal for DPI Fisheries review. Consultation closes Thursday, 20 April 2023.

Could you also please confirm if Fire and Rescue would like to review the landscape design plan including design layout and vegetation once detailed design is complete? And how Fire and Rescue would like to be informed and updated about the Site (i.e. final design layout including water hydrants sources/water pumps/water sources), progressively or only in the case of the event of a fire?

Warm Regards,

**Samantha Oyston** | Senior Environmental Consultant  
Arcadis | [REDACTED]  
[www.arcadis.com](http://www.arcadis.com)

---

**From:** Oyston, Samantha

**Sent:** Friday, 13 January 2023 2:49 PM

**To:** Fire Safety <[FireSafety@fire.nsw.gov.au](mailto:FireSafety@fire.nsw.gov.au)>

**Cc:** Jamie Crawford [REDACTED] Gail Hall

[REDACTED] Patel, Ketan [REDACTED]

**Subject:** RE: ATTN: John Dawes; Moorebank Avenue Realignment - Construction Management Plans

Hi David,

Apologies, I meant John Hawes. I believe he is a manager in the Operational Liaison Special Hazards Unit.

Thanks,

**Samantha Oyston** | Senior Environmental Consultant  
Arcadis | [REDACTED]  
[www.arcadis.com](http://www.arcadis.com)

---

**From:** Fire Safety <[FireSafety@fire.nsw.gov.au](mailto:FireSafety@fire.nsw.gov.au)>

**Sent:** Friday, 13 January 2023 2:46 PM

**To:** Oyston, Samantha [REDACTED]

**Cc:** Jamie Crawford [REDACTED] Gail Hall

[REDACTED] Patel, Ketan [REDACTED]

**Subject:** RE: ATTN: John Dawes; Moorebank Avenue Realignment - Construction Management Plans

Good afternoon Oyston

There isn't a John Dawes that works at FRNSW. Can you please double check the name or advise who else if you have worked with on the below at FRNSW?

Thanks

Fire & Rescue NSW



**DAVID SHIELD**

Administration & Project Officer  
CSD ADMIN & PROJECT SERVICES | Fire and Rescue NSW

[REDACTED]  
A: 1 Amarina Avenue, Greenacre NSW 2190 | Locked Mail Bag 12,  
Greenacre, NSW 2190  
[www.fire.nsw.gov.au](http://www.fire.nsw.gov.au)



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**From:** Oyston, Samantha [REDACTED]  
**Sent:** Friday, 13 January 2023 2:34 PM  
**To:** Fire Safety <[FireSafety@fire.nsw.gov.au](mailto:FireSafety@fire.nsw.gov.au)>  
**Cc:** Jamie Crawford [REDACTED] Gail Hall  
[REDACTED] Patel, Ketan [REDACTED]  
**Subject:** ATTN: John Dawes; Moorebank Avenue Realignment - Construction Management Plans

**CAUTION:** This email originated from outside of Fire and Rescue NSW. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

Arcadis are currently developing the Construction Environmental Management Plan and Associated Sub-plans for the Moorebank Avenue Realignment Works (SSI-10053) on behalf of the National Intermodal Corporation.

The Project involves the realignment of an existing section of Moorebank Avenue, from a point approximately 130 meters south of the Anzac Road/Moorebank Avenue intersection to a point immediately north of the East Hills Railway. Moorebank Avenue currently divides the Moorebank Logistic Park. The key features of the Project include:

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At the completion and commissioning of the realigned road section, the public through traffic using Moorebank Avenue will be redirected onto the new alignment. The existing road alignment will be decommissioned and modified to function as a restricted access to the Moorebank Logistic Park.

We are aiming to send the Bushfire Management Plan for FRNSW review during the week commencing of 6 February 2023.

Warm Regards,

**Samantha Oyston (she/her)** MRes, BEnv  
Senior Environmental Consultant  
Arcadis Australia Pacific  
Level 16, 580 George Street, Sydney | NSW 2000 | Australia  
[REDACTED]  
[www.arcadis.com](http://www.arcadis.com)



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## APPENDIX B Environmental Representative Endorsement



27 April 2023

Our Ref: 2205 L7.1

National Intermodal Corporation  
Senior Manager – Planning and Environment  
Attention: Westley Owers

Dear Westley

**SSI 10053 - Moorebank Avenue Realignment Works (MARW)  
Environmental Representative (ER) - Endorsement of the Construction Bushfire  
Management Plan**

Pursuant to SSI10053 Conditions of Approval (CoA) A31(d) and C9, I confirm that I have reviewed and endorsed the following documentation as being consistent with the conditions of approval and relevant undertakings made in the documents listed in Condition A1:

- National Intermodal Corporation, Moorebank Avenue Realignment Works, Appendix M, Construction Bushfire Management Plan, Version E, dated 21 April 2023 (CBFMP).

The CBFMP was prepared to expressly address REMM BUS01.

In accordance with CoA C8, the CBFMP was expressly nominated by a nominee of the Planning Secretary to be endorsed by the ER (Department of Planning and Environment letter dated 22 November 2022, Reference: SSI-10053-PA-4).

Yours sincerely,

Maurice Pignatelli  
Environmental Representative – MARW Project  
OptimE Pty Ltd



## APPENDIX C Secondary CoA and REMMs

There are no secondary CoA's associated with the CBFMP.

## C1: Secondary REMMs relevant to the development of the CBFMP

No.	Requirements	Timing	Document reference
BUS02	Where temporary construction compounds as well as temporary stockpile and laydown areas require access roads, on-site parking, and hardstand/loading areas, these facilities will be located in the most appropriate location in order to establish defensible space for fire-fighting purposes, as well as to mitigate the potential for ignition of surrounding bushland from project sources.	Prior to construction	Section 6.1
BUS03	Temporary construction buildings will also have fully compliant fire safety systems in accordance with AS and National Construction Code requirements and as appropriate to the building type, including some or all of the following features: <ul style="list-style-type: none"> <li>• fire extinguishers;</li> <li>• fire hose reels;</li> <li>• fire hydrant systems; and</li> <li>• automatic sprinkler systems.</li> </ul>	Prior to construction	Section 6.1
BUS04	Temporary construction compound will be constructed and routinely serviced to comply with the specific requirements, as relevant to the structure type.	Prior to and during construction	Section 6.1 Section 6.2
BUS07	All site offices will be accessible via access roads suitable for firefighting appliances similar to NSW RFS category 1 tankers.	Prior to and during construction	Section 6.3 Table 6.3
BUS08	All access roads and tracks must be inspected annually and management actions undertaken if roads and tracks are considered unsuitable for emergency vehicle passage (inspect for erosion, fallen timber, locked gates, and dead end tracks). Where locked gates are required, keys will be provided to RFS and FRNSW (if required).	During construction	Section 6.3
BUS09	Gates will be kept in good condition for entry and exit of fire fighting vehicles.	During construction	Table 6.4 MM BF16
BUS10	Ongoing maintenance to ensure a minimum four metres vertical clearance through the removal of overhanging branches or objects that will prevent access within the Project Site.	During construction	Section 6.2 Table 6.4 MM BF17
BUS11	All pumps and water sources will be maintained in working order, clearly marked and easy to find.	During construction	Table 6.4 MM BF10 Figure 6.1



No.	Requirements	Timing	Document reference
BUS12	All fittings will be compatible with RFS and FRNSW fire trucks.	Prior to and during construction	Table 6.4 MM BF14
BUS13	Security clearances, communication and access arrangements will be kept updated and confirmed with RFS and FRNSW in readiness for upcoming season.	During construction	Section 6.4.2
BUS14	APZs and/or defensible space will be kept free of obstacles to provide access for RFS and FRNSW fire-fighting appliances and personnel.	During construction	Section 6.2
BUS15	Diesel generators and associated fuel storage tanks will be designed, housed, and maintained so as not serve as an unacceptable risk to surrounding forest. Diesel generators and associated fuel storage tanks will be located away from the hazard, wherever possible.	Prior to and during construction	Section 6.5
BUS16	Hazardous materials will be located away from the hazard wherever possible.	During construction	Section 6.5
BUS17	Equipment will be maintained in good working order.	During construction	Section 6.5
BUS18	Plant and equipment will be fitted with appropriate spark arrestors, where practical, and limiting vehicle movement over long grass.	During construction	Section 6.5
BUS19	All vehicles will be provided with portable fire extinguishers that comply with relevant AS.	Prior to and during construction	Section 6.5
BUS20	Site staff will be informed of the site rules included designated smoking areas and putting rubbish in designated bins.	During construction	Section 7.2
BUS21	Hot work permits will be obtained where required and no hot works on total fire bans and/or conditions associated with extreme fire weather.	During construction	Section 6.4.1 Section 7.2 Table 6.4 MM BF04
BUS22	Adequate storage and handling requirements for potentially flammable substances in accordance with relevant guidelines.	Prior to and during construction	Section 6.5
BUS23	Emergency services will be immediately notified of the location and nature of any accidental ignition of surrounding vegetation and/or structures, that was unable to be successfully extinguished.	During construction	Section 7.6
BUS24	The Project will assist RFS/FRNSW in the investigation of the cause of any unplanned fires in proximity to the Project, should they occur.	During construction	Section 7.6

No.	Requirements	Timing	Document reference
BUS26	The temporary construction compound will be constructed and routinely serviced to comply with the specific requirements, as relevant to the structure type and to be determined by the contractor at the detailed design stage.	Prior to and during construction	Section 6.1
BUS29	Emergency management procedures will be reviewed after incidents of bushfire or other fires as well as annually at the end of each bushfire season and amended, if required, to improve the effectiveness of the plan.	During construction	Section 8.2
BUS30	Bushfire awareness training/induction will be provided to all new staff members and contractors, prior to and during the bushfire season for bushfire specific awareness and regularly for other fire awareness (e.g. structure fire and ignition sources).	During construction	Section 7.2
BUS31	Details of requirements for pre-season fire drills will be provided during staff briefings.	During construction	Section 6.4.2 Section 7.2
BUS32	Formal meetings will be conducted with relevant stakeholders prior to the bushfire season, when higher fire weather is forecast or there are fire events in the surrounding area. Potential participants to include staff, contractors, neighbouring community representatives and external fire authorities and land managers (e.g. RFS and FRNSW).	During construction	Section 6.4.1
BUS33	Fire weather warnings, severe (extreme) weather warnings and total fire bans will be communicated daily during the bushfire danger season to all staff, contractors, and visitors at the Project. Information can be found on the fire information page (Fire danger ratings and total fire bans) of the RFS website.	During construction	Section 6.4.1 Section 7.2
BUS34	The recognition of very high <sup>5</sup> or greater fire danger days triggering will be used as a requirement to view the fire information page (Fires Near Me, Major fire updates) on the RFS website (NSW RFS 2020).	During construction	Section 6.4.1 Section 7.2
BUS35	Staff, contractors, and visitors will be made aware of and required to respond accordingly to the three levels of alert under the national bushfire warning system (Advice, Watch and Alert, Emergency Warning).	During construction	Section 6.4.1 Section 7.2

<sup>5</sup> This is now "high" based upon the updated Bushfire Danger Ratings as shown in Figure 4.1.