



File Ref. No: BFS18/1460 (3710)
TRIM Ref. No: D23/121516
Contact: Matthew Warbrick

7 December 2023

General Manager
City of Parramatta Council
PO Box 32
Parramatta NSW 2124

Email: council@cityofparramatta.nsw.gov.au

Attention: Manager Compliance/Fire Safety

Dear Sir Madam,

**Re: INSPECTION REPORT
RESIDENTIAL APARTMENTS
128 MACQUARIE STREET PARRAMATTA (“the premises”)**

Fire and Rescue NSW (FRNSW) received correspondence on 28 May 2018 concerning the adequacy of the provision for fire safety in connection with ‘the premises’.

The correspondence stated in part that:

The internal hydrant system is dry. An inspection of the hydrant system found the pipe work was rusted and a valve had been shut preventing water to the hydrants.

Pursuant to Section 9.32(1) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), Authorised Fire Officers from the Fire Safety Compliance Unit of FRNSW inspected ‘the premises’ on 21 November 2023.

On behalf of the Commissioner of FRNSW, the comments in this report are provided under Section 9.32(4) and Schedule 5, Part 8, Section 17(1) of the EP&A Act.

The items listed in the comments of this report are based on the following limitations:

- A general overview of the building was obtained without using the development consent conditions or approved floor plans as a reference.

- Details of the Provisions for Fire Safety and Fire Fighting Equipment are limited to a visual inspection of the parts in the building accessed and the fire safety measures observed at the time.
- Possible nonconformities identified in the report relate to the National Construction Code 2022, Volume 1 Building Code of Australia (NCC), provisions for fire safety and fire safety equipment. The items are not an exhaustive list of non-compliances. FRNSW acknowledges that the differences observed at the time may contradict development consent approval or relate to the building's age. Therefore, it's the Council's discretion as the appropriate regulatory authority to consider the most appropriate action.

COMMENTS

The following items were identified during the inspection:

1. Essential Fire Safety Measures

1A. Fire Detection and Alarm System (FDAS) - The zone block plan provided at the Fire Brigade Panel indicates that a single zone covers the entire building, contrary to the requirements of Clause 2.3 of AS 1670.1 – 2018.

1B. Fire Hydrant System - The fire hydrant system appears to have been installed in accordance with Ordinance 70 and Ministerial Specification No.10. Notwithstanding this, the following deviations from AS 2419.1-2021 have been identified, along with other items of concern:

A. Hydrant Booster Assembly

i. The hydrant booster assembly is located in a position which is not readily accessible to firefighters, contrary to the requirements of Clause 7.3.3 of AS 2419.1-2021. In this regard the booster assembly is located in a garden area, between the front wall and a retaining wall and access is permitted only via entering the property through the garden. Furthermore, the orientation and configuration of the booster assembly would not be functional for firefighting personnel to undertake fire fighting operations, with numerous obstructions, (including retaining walls and vegetation) and inadequate working space/clearances in front of and around the booster assembly.

ii. The booster assembly appears to be connected 'in series' with the fixed on-site fire pump. In accordance with the requirements of Clause 6.8 of AS 2419.1-2021, a 150mm diameter liquid filled pressure gauge or digital readout display of not less than 10mm has not been provided in accordance with the requirements of 6.8.2(a), Furthermore, signage to inform attending fire crews of the pump configuration has not been provided in accordance with the requirements of Clause 11.3.7.1. of AS 2419.1-2021.

- iii. The chain to secure the isolation valve at the booster assembly was broken, contrary to the requirements of Clause 8.7.1 of AS 2419.1 – 2021.
- iv. Test and boost pressure signage has not been provided at the booster assembly, contrary to the requirements of Clause 11.3.4 of AS 2419.1-2021

B. Fire Hydrant Pumproom

- i. With regard to the requirements of Clause 6.11.1 of AS 2419.1 – 2021, the following items were noted concerning the external pumproom:
 - a. Non firefighting equipment was stored within the pumproom.
 - b. A red strobe light had not been provided adjacent to the pumproom door.
 - c. The required internal clearance of 2.1m had not been provided.
- ii. The external pumproom doorway had not been provided with self-closing fire door, contrary to the requirements of Clause 6.11.3 of AS 2419.1 – 2021.

C. Internal Fire Hydrants

- i. Adequate clearances have not been provided to the hydrant valves located in cupboards along the public corridors of 'the premises', contrary to the requirements of Clause 3.2.2.2 of AS 2419.1–2021.
- ii. The internal hydrants throughout the building are located in the public corridors and the carpark and not within the required fire-isolated stairways, contrary to the requirements of Clause 3.6.2 of AS 2419.1-2021

The following sets out the formal position of FRNSW regarding fire hydrant systems in existing premises:

When the consent authority (e.g. Council) is assessing the adequacy of an existing fire hydrant system installed in accordance with the provisions of Ordinance 70 and Ministerial Specification 10 (or earlier), FRNSW recommend that the system be upgraded to meet the requirements of the current Australian Standard AS 2419.1 to facilitate the operational needs of FRNSW.

It may be appropriate for a partial upgrade of the existing fire hydrant system be undertaken. A partial upgrade may be proposed to address deficiencies in the design and/or performance of the existing fire hydrant system, when assessed against the requirements of Australian Standard AS 2419.1, so that the upgraded fire hydrant system will meet the operational needs of FRNSW.

Where a hybrid fire hydrant system is proposed, which incorporates the design and performance requirements from two different standards, the proponent should consult with FRNSW on the requirements for the fire hydrant system.

- 1C. Automatic fire suppression system -
- A. The residential part of the building a rise in storeys of more than 4 and appears to achieve an effective height of less than 25m and has not been provided with a sprinkler system throughout, contrary to the requirements of Clause E1D6 and Specification 18 of the NCC.
 - B. The building contains a single fire compartment basement carpark which may accommodate more than 40 vehicles, and has been provided with a sprinkler system throughout, contrary to the requirements of Clause E1D9 and Specification 17 of the NCC.
- 1D. Portable Fire Extinguishers (PFE) - No PFE's were observed anywhere throughout 'the premises', contrary to the requirements of Clause E1D14 of the NCC.
- 1E. Annual Fire Safety Statement (AFSS) - A copy of the current AFSS was not prominently displayed within the building in accordance with Section 89 of the EPAR 2021. In this regard, the AFSS on display was dated November 2016 and is no longer valid.

2. Access and Egress

- 2A. Operation of latch - Fire doors to fire isolated exits throughout the building contain round tulip style handles in lieu of a single hand downward action lever handle, contrary to the requirements of Clause D3D26 of the NCC.
- 2B. Exit Signs/Directional exit signage - It was evident that there were areas/parts within the basement carpark level, where the direction to the required exits was not readily apparent. Additional directional exit signs may be required throughout the carpark level, such that an exit sign or directional exit sign is clearly visible from all parts, in accordance with Clause E4D5 and NSW E4D6 of the NCC.

3. Compartmentation

- 3A. Bounding Construction - Screen security doors have been installed on the outside of multiple Sole Occupancy Units (SOU's) throughout 'the premises'. The following is the formal position of FRNSW in regard to screen doors fitted to SOUs:

The fitting of security or screen doors to the main fire door of a unit is a matter to be determined by the appropriate regulatory authority (e.g. Council) or certifier.

However, FRNSW recommends against the fitting of security or screen doors to SOUs due to the increased likelihood of the main fire door of the unit being propped open, corridor egress being impeded by an open security/screen door, and the fire rating of the door frame being compromised from any modification when fitting any additional security or screen door.

FRNSW believes that there are inadequate provisions for fire safety within the building.

RECOMMENDATIONS

FRNSW recommends that Council:

- a. Review items 1 to 3 of this report and conduct an inspection.
- b. Address any other deficiencies identified on "the premises".

Please be advised that Schedule 5, Part 8, Section 17(2) requires any report or recommendation from the Commissioner of FRNSW to be tabled at a Council meeting. This matter is referred to Council as the appropriate regulatory authority. FRNSW awaits the Council's advice regarding its determination under Schedule 5, Part 8, Section 17 (4) of the EP&A Act.

Please do not hesitate to contact Matthew Warbrick of FRNSW's Fire Safety Compliance Unit at FireSafety@fire.nsw.gov.au or call (02) 9742 7434 if there are any questions or concerns about the above matters. Please refer to file reference BFS18/1460 (3710) regarding any correspondence concerning this matter.

Yours faithfully



Conor Hackett
Senior Building Surveyor
Fire Safety Compliance Unit