

Appendix G

Bushfire Assessment Report



Bushfire Assessment

Supagas CO₂ Plant

**Wilga Park Power Station,
Bohena Creek**

Onward Consulting

19 May 2026

(Ref: 25046)

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Executive summary

Onward Consulting commissioned Peterson Bushfire to prepare a Bushfire Assessment Report to inform the preparation of an Environmental Impact Statement (EIS) for the construction and operation of a Supagas carbon dioxide (CO₂) plant to be located 12 km south-west of Narrabri.

The Project is a regionally significant development and Secretary's Environmental Assessment Requirements (SEARs) were issued by the Department of Planning, Housing & Infrastructure (DPHI). The SEARs require an assessment of bushfire risk including compliance with the NSW Rural Fire Service (RFS) document *Planning for Bush Fire Protection 2019* (PBP).

The aim of PBP is to provide for the protection of human life and minimise impacts on property from the threat of bushfire, while having due regard to development potential, site characteristics and protection of the environment.

This assessment is based on a detailed investigation into landscape and site influences on bushfire behaviour including research on bushfire hazard (i.e. vegetation and slope), fire weather, fire history, fire intensity patterns, potential ignition sources, assets at risk, and likely fire behaviour. To summarise the analysis findings, it is the combination of undesirable fire weather (i.e. hot and dry north-westerly winds) combined with ignition (natural or accidental) creating the potential for a bushfire to spread generally in a west to east direction. A fire may impact the site from adjoining Pilliga Outwash Dry Sclerophyll Forest to the north and west or spread from the site into the adjoining agricultural lands to the east including the Bohena Creek corridor.

A suite of bushfire protection measures is recommended to address the bushfire risk and protect the Project and identified assets in the surrounding area. The measures are categorised into the following groups:

- Asset Protection Zones (APZ) – Section 3.1
- Vegetation management – Section 3.2
- Building construction – Section 3.3
- Access for fire-fighting – Section 3.4
- Water supply for fire-fighting – Section 3.5
- Ignition prevention – Section 3.6
- Bushfire emergency management plan – Section 3.7

This assessment satisfies the SEARs requirement to identify potential hazards and risks associated with bushfires and to demonstrate compliance with PBP. Integrating the recommendations listed in Section 5.3 (Table 5) into the design will achieve the requirements of the SEARs and PBP.

1 Introduction

1.1 Background

Onward Consulting commissioned Peterson Bushfire to prepare a Bushfire Assessment Report to inform and support the preparation of an Environmental Impact Statement (EIS) for the construction and operation of a Supagas carbon dioxide (CO₂) plant (hereafter referred to as the Project).

The Project is a regionally significant development and Secretary's Environmental Assessment Requirements (SEARs) were issued by the Department of Planning, Housing & Infrastructure (DPHI). The SEARs require an assessment of bushfire risk and asset protection zones (APZ), including compliance with the NSW Rural Fire Service (RFS) document *Planning for Bush Fire Protection 2019* (PBP).

1.2 Project location and description

Supagas Pty Ltd (Supagas) is seeking to construct and operate a CO₂ plant, which would connect to the adjacent Wilga Park Power Station (WPPS). The Project would be located wholly within Lot 12 of DP 1171292 in the Narrabri Local Government Area (LGA), approximately 12 km south-west of Narrabri, NSW. Figure 1 shows the location of the Project.

The Project includes the construction and operation of a CO₂ plant, which would capture and process exhaust gas from gas generators within the WPPS.

This exhaust gas would be treated to produce a CO₂ product of food grade quality for export and use in the food, beverage, and other markets (the Project).

The key activities for the Project are as follows:

- clearing and earthworks for site preparation and to enable construction of the Project
- construction of the Project
- operation of the Project, including export of the CO₂ product via road transport
- decommissioning, rehabilitation, and closure.

The Project is designated development and requires approval under Part 4 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). The Project meets the requirements for Regionally Significant Development under the State Environmental Planning Policy (Planning Systems) 2021 (SEPP Planning Systems).

A general arrangement plan is included as Figure 2.



Legend

- Buffer - 10km
- Buffer - 5km
- Buffer - 1km
- Subject Land

Figure 1: Location

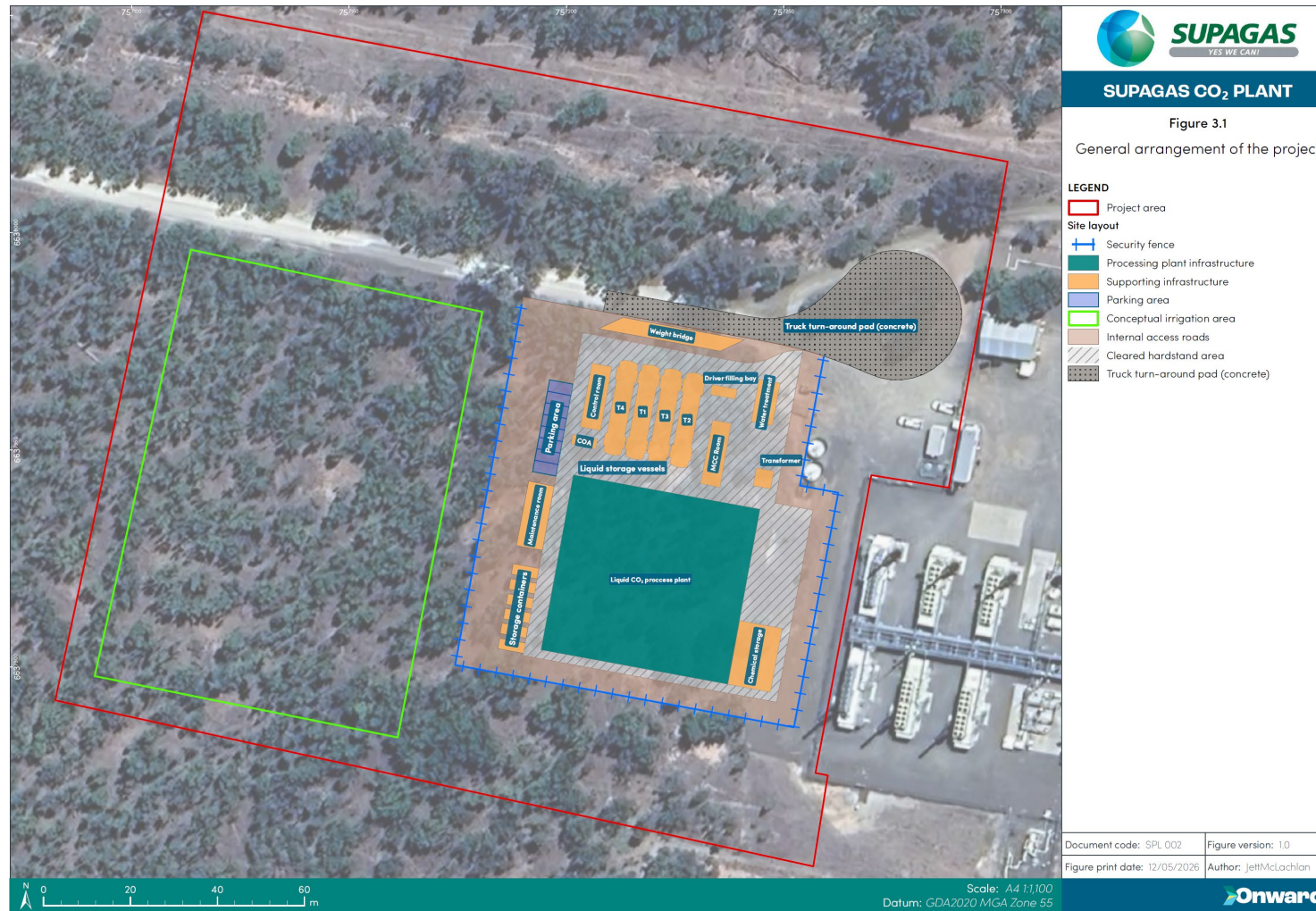


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Kilometers

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services



1.3 Purpose of this report

The Project involves land identified as ‘bushfire prone land’ (BPL) as shown by the BPL mapping presented in Figure 3 (more information on the BPL mapping is provided in Section 1.4 below). Development proposals on land identified as bushfire prone require assessment in accordance with the RFS document *Planning for Bush Fire Protection 2019* (referred to as ‘PBP’ throughout this report).

The SEARs issued by DPHI and relevant department/agency requirements relating to bushfire and where these requirements are addressed in this technical report, are outlined in Table 1.

Table 1: SEARs and associated requirements

Requirement	Where addressed in this document
SEARs	
<i>Hazards and risk:</i> an assessment of bushfire risks and asset protection zones (APZ) in accordance with the NSW Rural Fire Service guidelines.	Assessment of potential hazards and risks from bushfires is addressed in Chapter 2 of this technical report. Compliance with the NSW RFS guidelines <i>PBP</i> is addressed within Chapters 3 and 4.
Narrabri Shire Council (NSC)	
<i>Hazards and risk:</i> The site is identified as Bushfire prone land, as such an assessment of bushfire risks and asset protection zones (APZ) in accordance with NSW Rural Fire Service guidelines should be included as part of the EIS	As above.
NSW RFS	
<i>The EIS shall identify bushfire risk to the proposed development and recommend mitigation measures to reduce said risks. The identified risk and mitigation measures shall address both construction and operation phases of the development.</i>	This technical report.

1.4 Assessment requirements

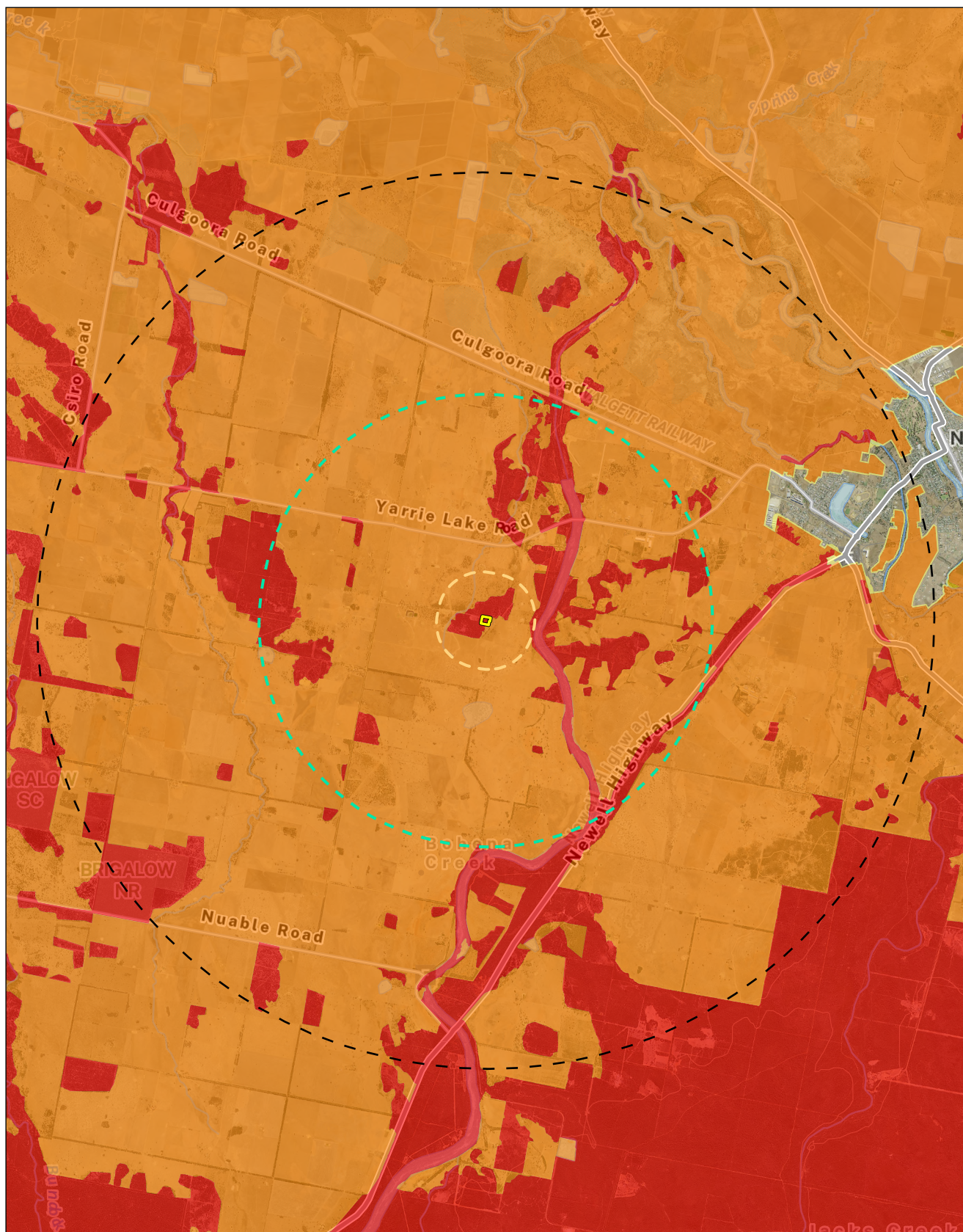
1.4.1 Bushfire prone land mapping

The purpose of BPL mapping is to identify lands that may be subject to bushfire risk based simply of the presence of vegetation that could act as a hazard. The maps are a planning tool used to trigger further detailed assessment. They do not present a scalable measure of hazard, threat or risk. These parameters are to be determined under further assessment in accordance with PBP (i.e. this Bushfire Assessment Report).

The BPL mapping presented in Figure 3 identifies the land surrounding the Project as supporting Vegetation Category 1 (highest risk) and Vegetation Category 3 (medium risk), which represents the potential for forest/woodland and grassland hazards, respectively.

The maps are produced at a broad scale by desk-top Geographic Information Systems (GIS) covering an entire Local Government Area (LGA). They are often conservative and are designed to identify any potential bushfire threat of all levels. Most importantly, the identification of BPL does not preclude development. The maps are not prescriptive and simply trigger further detailed assessment.

The identification of bushfire hazards is discussed in the following Section 2 and is based on site inspection detailed vegetation mapping, therefore superseding the vegetation categorisation mapping shown on Figure 3.



Legend

- Buffer - 10km
- Buffer - 5km
- Buffer - 1km
- Subject Land

Bushfire Prone Land

- Vegetation Category 1
- Vegetation Category 2

- Vegetation Category 3
- Vegetation Buffer



0 1 2 4
Kilometers

Figure 3: Bushfire Prone Land

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services

1.4.2 Planning for Bush Fire Protection 2019

As required by the SEARs, the Project has been assessed against the requirements of the NSW RFS guidelines (PBP). PBP is a planning document that applies to all development located on land identified as 'bushfire prone' across NSW. The aim of PBP is to provide for the protection of human life and minimise impacts on property from the threat of bushfire, while having due regard to development potential, site characteristics and protection of the environment. PBP indicates that bushfire protection can be achieved through a combination of strategies, which are based on the following principles:

- Control the types of development permissible in bushfire prone areas.
- Minimise the impact of radiant heat and direct flame contact by separating development from bushfire hazards.
- Minimise the vulnerability of buildings to ignition and fire spread from flames, radiation and embers.
- Enable appropriate access and egress for the public and firefighters.
- Provide adequate water supplies for bushfire suppression operations.
- Focus on property preparedness, including emergency planning and property maintenance requirements.
- Facilitate the maintenance of APZs, fire trails, access for fire-fighting and on site equipment for fire suppression.

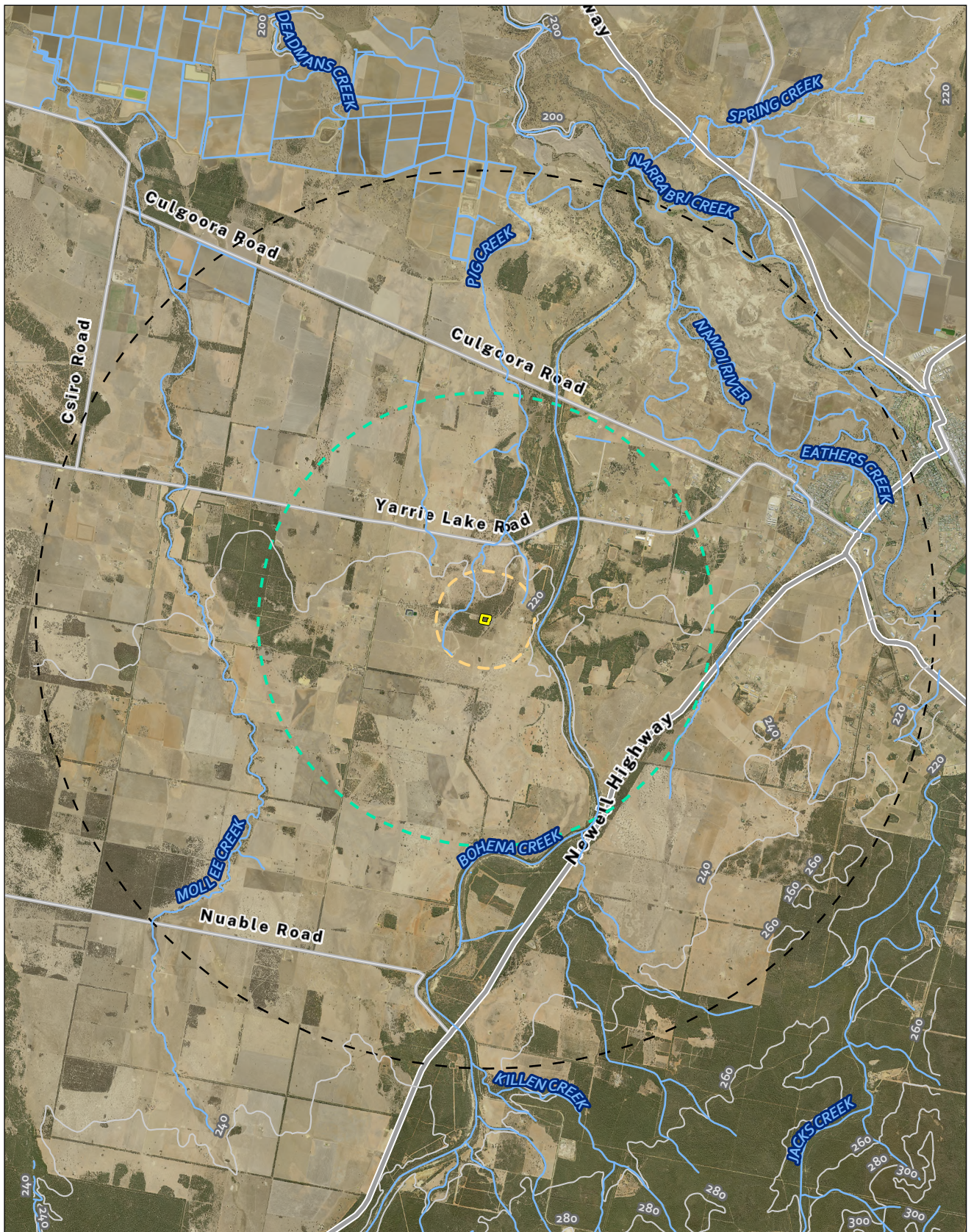
Section 8.3.9 of PBP outlines the specific assessment requirements for hazardous industry. Some developments are hazardous by their nature and have the ability to start bushfires. Appropriate protection measures are to be provided commensurate with the hazards and risks. Any fire safety studies prepared under the Hazardous Industry Planning and Assessment Papers (HIPAPs) are to be consulted to determine the hazards and corresponding bushfire protection measures in order to satisfy Section 8.3.9 of PBP.

2 Bushfire landscape assessment

An analysis of the bushfire landscape, or parameters that give rise to the bushfire threat, provides the foundation for assessment of bushfire risk and determination of appropriate bushfire protection measures. The parameters to be analysed are discussed in the following subsections and consist of bushfire hazard (comprising vegetation and topography), fire weather, fire history, potential ignition sources, fire intensity patterns, assets at risk and likely fire behaviour.

Figure 4 shows the wider landscape influencing a bushfire approaching the Project. The predominant bushfire landscape features within 10 km of the Project consist of:

- A predominance of cleared rural lands dissected by roads, rural laneways and boundary trails.
- Remnant patches of bushland particularly around the Project within 1 km, the Bohena Creek corridor to the east and north between 1-5 km, and the Pilliga Scrub greater than 10 km to the south-east.
- Narrabri West and Narrabri townships within 5-10 km to the north-east.



Legend

- | | | | |
|--|---------------|--|--------------|
| | Watercourse | | Buffer - 5km |
| | Contour - 10m | | Buffer - 1km |
| | Buffer - 10km | | Subject Land |



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Kilometers

Figure 4: Landscape Context

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services

2.1 Vegetation communities

Bushfire fuel is the vegetative material in the landscape that burns during a bushfire. Bushfire behaviour is significantly influenced by fuel load, driving the intensity of a bushfire.

The vegetation communities within 10 km of the Project have been mapped by Department of Planning, Industry & Environment (State Vegetation Type Map). The communities are shown on Figure 5.

The predominant vegetation patterns that would influence fire intensity across the landscape are listed below:

- Expansive areas of Pilliga Outwash Dry Sclerophyll Forest (DSF) surrounding the Project to the north and west within 1 km. Although forming a large area, the fuel loads of this vegetation class are low (11.05 t/ha overall fuel load) and align more closely to the fuel load of the semi-arid woodland class rather than a DSF.
- Predominance of cleared agricultural lands within 10 km. These lands can present a potential 'grassland' hazard depending on the type of crop, level of growth, curing and grazing practices. Fuel loads assigned by PBP to grassland hazards (i.e. natural grassland systems) which are used in this assessment are low (6 t/ha) and the fuel loads for crops and grazing lands are expected to be even lower.
- Expansive patches of woodland and DSF communities between 5 and 10 km particularly along the Bohena Creek corridor generally to the east. The patches, although large in size, are separated from each other and the site by agricultural lands.

Photographs of the vegetation immediately surrounding the Project are included at Appendix A.



Legend

- Buffer - 10km
- Buffer - 5km
- Buffer - 1km
- Subject Land

Plant Community Type

- Shallow freshwater wetland sedgeland in depressions on floodplains on inland alluvial plains and floodplains
- Belah woodland on alluvial plains and low rises in the central NSW wheatbelt to Pilliga and Liverpool Plains regions.

- Brigalow - Belah open forest / woodland on alluvial often gilgaied clay from Pilliga Scrub to Goondiwindi, Brigalow Belt South Bioregion
- Narrow-leaved Ironbark - White Cypress Pine - Buloke tall open forest on lower slopes and flats in the Pilliga Scrub and surrounding forests in the central north Brigalow Belt South Bioregion
- Not classified
- Pilliga Box - White Cypress Pine - Buloke shrubby woodland in the Brigalow Belt South Bioregion

- Poplar Box - White Cypress Pine shrub grass tall woodland of the Pilliga - Wialda region, Brigalow Belt South Bioregion
- Red gum - Rough-barked Apple +/- tea tree sandy creek woodland (wetland) in the Pilliga - Goonoo sandstone forests, Brigalow Belt South Bioregion
- Riparian sedgeland rushland wetland of the Pilliga to Goonoo sandstone forests, Brigalow Belt South Bioregion
- River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion



Date: 19/06/2025

0 375 750 1,500
Meters

Figure 5: Vegetation Communities

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services

2.2 Topography

Steeper slopes can significantly increase the rate of spread of fires, and it has been shown that with each 10 degree increase or decrease in slope there is a corresponding doubling or halving, respectively, in the rate of spread can be expected (McArthur 1967). Therefore slope is a major factor determining the direction and rate of fire spread.

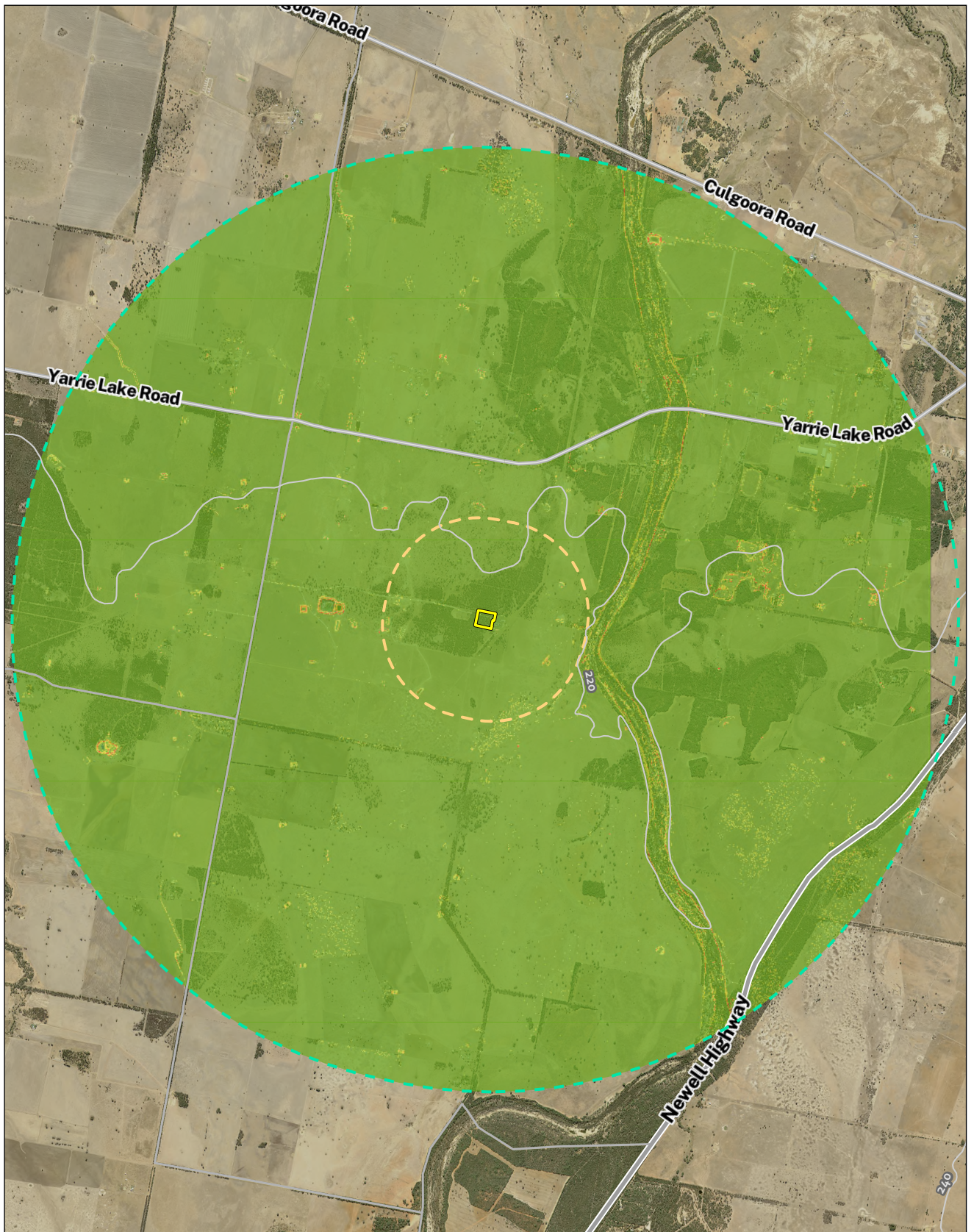
Figure 6 shows the pattern of the terrain across the surrounding landscape (within 10 km of the Project). The noticeable feature is the predominance of virtually flat land surrounding the Project. The only slope exceeding 5 degrees is short embankments along Bohena Creek to the east and around farm dams. Slope will not be a contributing factor to rate of fire spread for this site.

2.3 Fire weather

As described in the *Namoi-Gwydir Bush Fire Risk Management Plan* (Namoi-Gwydir Bush Fire Management Committee 2018) the area has warm to hot summers, generally moderate and variable rainfall, and winter consists of cool clear days and cold nights.

The bushfire season generally runs from October to March and the prevailing weather has the potential to extend outside of this timeframe. Dangerous bushfire seasons are most associated with a combination of two or more of the following factors:

- Persistent north-west winds
- High daytime temperatures
- Low relative humidity
- Dry lightning storms
- Lower than average rainfall through winter and spring
- Occurrence of an extended drought period



Legend

- Contour - 10m
- Buffer - 10km
- Buffer - 5km
- Buffer - 1km

- Subject Land
- Slope**
- 0°
- 0.001 - 5°

- 5.001 - 10°
- 10.001 - 15°
- 15.001 - 20°
- >20°



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0 0.5 1 2
Kilometers

Figure 6: Terrain

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services

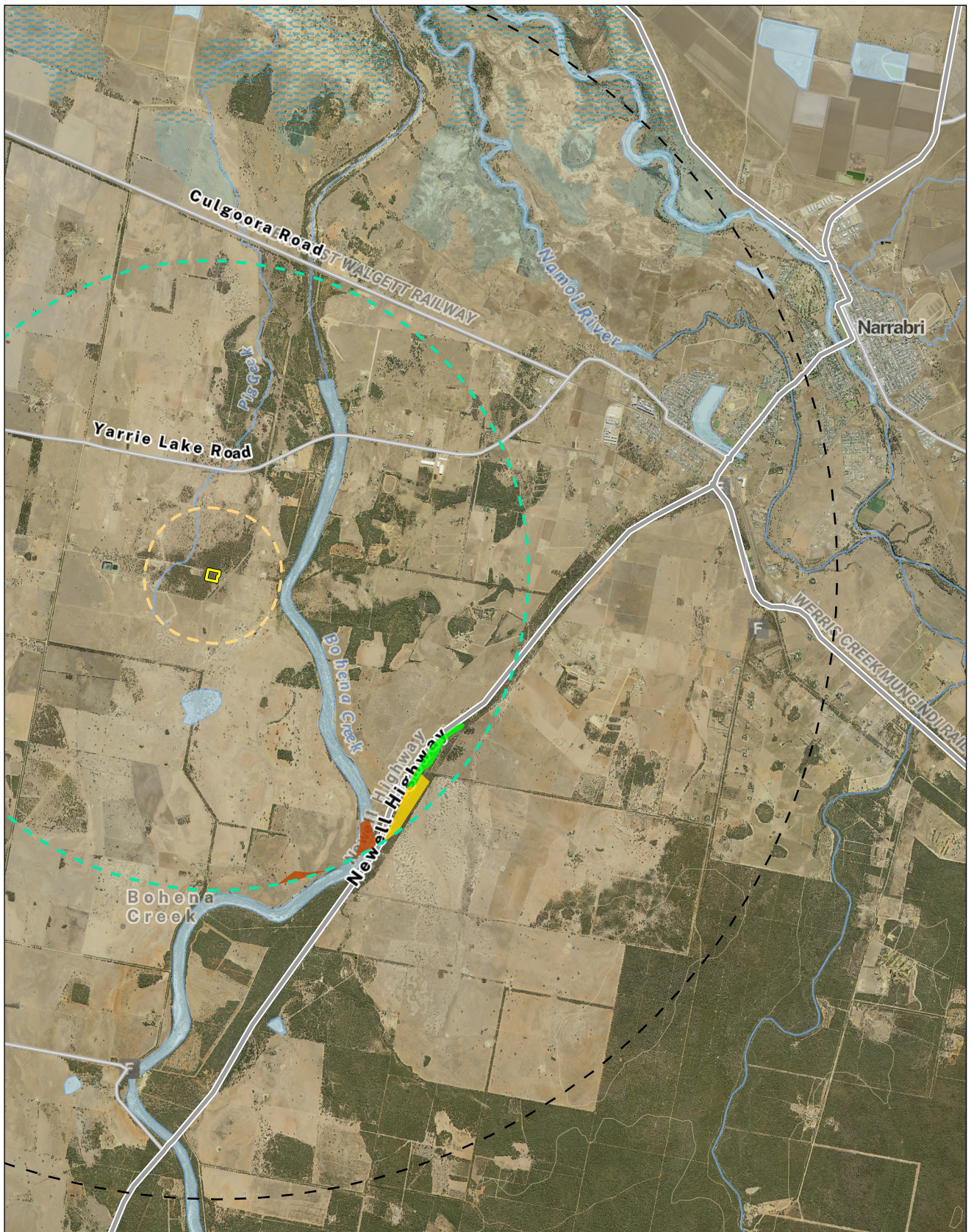
2.4 Fire history

Information on fire history such as temporal and spatial pattern of fire spread is a useful factor in understanding bushfire risk. Fire history is shown on Figure 7 (time since last fire) and Figure 8 (fire frequency).

The fire history mapping shows that the surrounding land has not been affected by wildfire in many years (the wildfire data does not include smaller fires and ignitions). There has been some small fires along the Newell Highway approximately 5 km to the south-east.

The Duck Creek Pilliga Fire of the 2023/2024 fire season occurred more than 10 km to the south-east of the Project area. The Pilliga Scrub generally has had numerous large wildfires however this vast expanse of vegetation is located beyond the 10 km study area and separated from the Project and its adjacent vegetation by cleared agricultural lands including many roads.

The *Namoi-Gwydir Bush Fire Risk Management Plan* states that dry lightning is the greatest ignition risk in the area, followed by accidental ignitions caused by using machinery in grass and other activities such as welding and grinding.



Legend

- Buffer - 10km
- Buffer - 5km
- Buffer - 1km
- Subject Land

Time Since Fire

- 2 year
- 4 years
- 5 years
- 6 years

- 10 years
- 13 years
- 16 years
- 36 years
- 57 years



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Kilometers

Figure 7: Time Since Fire

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services



Legend

- Buffer - 10km
- Buffer - 5km
- Buffer - 1km
- Subject Land

Fire Frequency

- 1
- 2
- 3



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0 0.5 1 2
Kilometers

Figure 8: Fire Frequency

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services

2.5 Fire intensity analysis

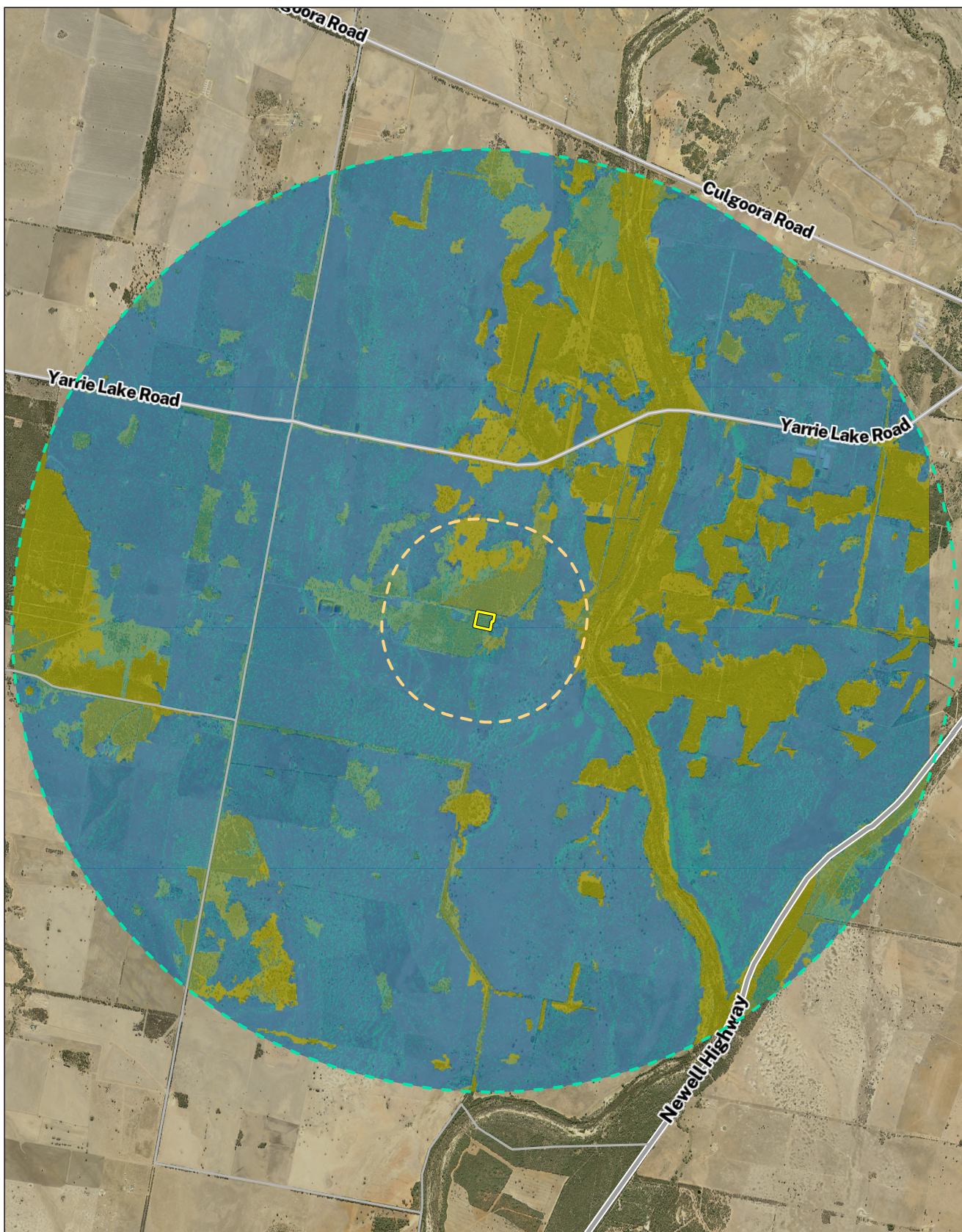
The predicted fire intensity within 10 km of the Project has been modelled using GIS. The GIS model is based on the fire behaviour formula of McArthur Mk 5 (1967) and utilised inputs of vegetation (fuel load), slope and aspect as summarised below:

- Vegetation (Figure 5) fuel loads (t/ha) based upon likely climax fuel loads as specified by the NSW Rural Fire Service document *Comprehensive Vegetation Fuel Loads* (NSW RFS 2019);
- Slope in degrees (Figure 6);
- Fire weather represented by a Fire Danger Index (FDI) of 80. This is the planning (design) level for the locality specified by PBP; and
- A direction of fire spread under the influence of winds from the north to south-west sector

The fire intensity mapping displays the intensity of a fire travelling under winds from the north to south-west sector by providing an understanding of rate of spread, risk to fire-fighters, fire control line feasibility and the relative bushfire risk across the landscape.

The mapping of areas into varying degrees of intensity does not indicate how often an area would receive potentially damaging fires, however, it provides a useful comparative ranking across the landscape. Mapping intensity assists in understanding the potential behaviour of bushfires and fire pathways. For example, locations with an expanse of higher bushfire intensity running in a west to east direction may represent a potential fire pathway.

The strongest pattern shown by the fire intensity mapping is the slightly higher intensity areas to the north and west of the Project. This area is immediately adjacent to the Project and comprises almost the north-western quarter of the 5 km buffer analysis area. Higher intensity areas are directly a result of the difference in fuel loads between those areas vegetated by the Pilliga Outwash DSF and the cleared agricultural lands. The fire intensity is relatively low compared to the potential intensity shown in the legend on Figure 9. As mentioned in Section 2.2, slope does not contribute to the fire intensity at this site.



Legend

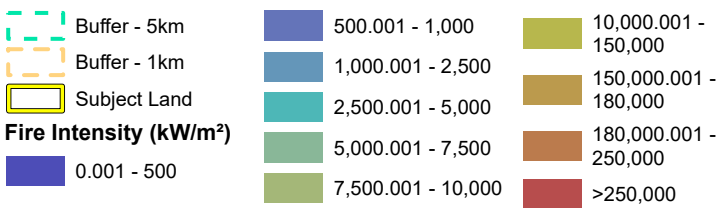


Figure 9: Fire Intensity (kW/m²)



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Date: 19/06/2025

0 0.5 1 2
Kilometers

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services

2.6 Potential fire ignition

The *Namoi-Gwydir Bush Fire Risk Management Plan* states that the main sources of ignition consist of:

- Dry lightning strikes
- Accidental ignition from agricultural activities

These forms of ignition can occur anywhere surrounding the Project. There is also the potential for ignitions to occur within the Project area as a result of works associated with construction and operation of the Project. Appropriate management of activities required for the Project is important to ensure fire risk is kept to a minimum throughout all stages of the Project.

2.7 Assets at risk

Assets at risk can be divided between those associated within the Project (i.e. proposed) and those external to the Project (i.e. existing). The asset base that has been considered within this assessment is outlined below.

The Project and all components within are considered an asset at risk. External to the Project, the closest asset is the WPPS which is immediately adjacent to the east and will supply the exhaust gas used in the Project. There are a number of dwellings and rural land holdings dispersed across the agricultural landscape. These dwellings are few in number and widely dispersed and often separated by large expanses of cleared lands.

Residential dwellings on rural properties are scattered throughout the landscape and bushfire risk, albeit low, is an existing phenomenon. Notwithstanding, protection of life and property is an objective of PBP, therefore it is imperative for the Project to incorporate suitable protection measures to reduce the risk of fire activities and to not increase the level of fire risk within the area.

The Narrabri West and Narrabri townships are the closest population centre to the Project and are located approximately 7 km to the north-east. The next closest population centre is Wee Waa more than 25 km to the north-west.

Other assets surrounding the Project may include:

- Agricultural crops
- Stock
- Farming infrastructure including fences and sheds
- Public Infrastructure including roads, transmission networks and telecommunications
- Threatened Ecological Communities (TEC) and species
- Heritage sites

All assets identified above, including operational and maintenance components of the Project, would be potentially at risk from a bushfire that may initiate either from within the Project area, or from an external fire threat. The density and spatial distribution of these assets has been considered within this assessment and during the development of recommended protection measures.

2.8 Assessment of likely fire behaviour and bushfire threat

Based on the information provided in the preceding Sections 2.1 to 2.7, likely fire behaviour can be predicted. It is the combination of undesirable fire weather (i.e. hot and dry north-westerly winds) combined with ignition (natural or accidental) creating the potential for a bushfire to spread generally in a west to east direction. A fire may impact the Project area from surrounding vegetation to the north and west or spread from the Project area into the adjoining agricultural lands to the east including the Bohena Creek corridor.

3 Bushfire protection measures

This section outlines the bushfire protection measures recommended to address the bushfire risk and protect the identified assets. The measures are designed to minimise bushfire impact to the Project and prevent fire from spreading from the Project.

Section 8.3.9 of PBP requires the assessment of a suite of appropriate bushfire protection measures that in total provide an adequate level of protection for a project and nearby assets commensurate with the bushfire risk. The following sections outline how the recommendation bushfire protection measures.

The measures range from separation of hazard from the asset by way of an APZ through to providing fire-fighters with access and water for suppression operations. A 'measures in combination' approach is desired and is the framework of PBP.

The following subsections outline the recommended bushfire protection measures, which fall within the categories of:

- Asset Protection Zones (APZ) – Section 3.1
- Vegetation management – Section 3.2
- Building construction – Section 3.3
- Access for fire-fighting – Section 3.4
- Water supply for fire-fighting – Section 3.5
- Ignition prevention - Section 3.6
- Bushfire emergency management – Section 3.7

3.1 Asset Protection Zones (APZ)

3.1.1 Overview

An APZ is a buffer area between a bushfire hazard and an asset which minimises the impact of fire on that asset. The foremost significant treatment for reducing bushfire risk is the establishment of an APZ. This involves the removal and continual management of vegetation to create a buffer zone that reduces the effect of flame contact and radiant heat on the asset as well as providing access for fire-fighting operations and other controls on the built environment. An APZ also reduces the chances of fire escaping from a site and entering surrounding bushland by ensuring a minimal fuel environment whereby fire cannot propagate and spread.

The dimension of the APZ is determined by the ability for fire-fighters to gain access between the hazard and the asset and the vulnerability of the asset that may be related to material combustion or threat to life. For example, the APZ dimensions specified by PBP for residential dwellings relate to a construction standard, or Bushfire Attack Level (BAL) of BAL-29. No such

standard exists for the development type proposed; therefore, a precautionary approach is proposed.

3.1.2 APZ for the Project

In line with the precautionary principle, the Project components should have an APZ to prevent exposure to a radiant heat flux greater than BAL-29 (i.e. 29 kW/m²). BALs above BAL-29 are associated with high levels of radiant heat and flame contact, which should be avoided.

The APZ distance required around the Project to ensure a rating no higher than BAL-29 is 20 m based on the PBP Acceptable Solutions listed in PBP Table A1.12.5. The APZ determination has been based on 'forest' on 'flat' land at the threshold of BAL-29. This distance can be reduced to 7 m using modelling (NBC Bushfire Attack Assessor) to achieve the PBP Performance Criteria based on the very low fuel loads of the Pilliga Outwash DSF community (7 t/ha surface fuel and 11.05 t/ha overall fuel as per the RFS document 'NSW Comprehensive Fuel Loads'). The modelling reports are included at Appendix B.

Figure 10 shows the 7 m APZ required to achieve BAL-29 for all components (not including fences and weighbridge). The 7 m APZ is provided within the proposed facility security fence to the north, west and south. In the east direction is the maintained land associated with the power station. Figure 10 also shows that there will be more than 7 m available to the north (13 m) and west (19 m) whereby the facility benefits from a wider maintained area surrounding. The WPPS to the east provides more than 100 m of maintained land.

3.2 Vegetation management

3.2.1 Overview

Using appropriate bushfire sensitive landscape treatments and maintenance regimes across a site is vital to protecting assets in the event of a bushfire. Research has shown that inappropriate landscaping and poor maintenance can allow embers to ignite secondary fires within a site and threaten built form even after the main bushfire front has passed. APZs and the site internally should be maintained to ensure that vegetation, including groundcovers and any landscaping, is in a minimal fuel condition to prevent the spread of fire within a site.

3.2.2 The Project

The facility within the security fence is to be maintained to achieve the performance criteria of an Inner Protection Area (IPA) standard as described by Appendix 4 of PBP. The following fuel specifications should be adopted to achieve an IPA standard for the Project:

Trees

- Trees at maturity should not touch or overhang assets.
- Tree canopies should not be connected when at maturity. Gaps between crowns or groups of crowns are to be maintained at distances of at least 5 m.

Shrubs

- Shrubs should not be planted within the Project area.

Groundcovers

- Grass should be regularly mown or slashed.
- Organic mulch is not to be used within 2 m of infrastructure.

3.3 Building construction

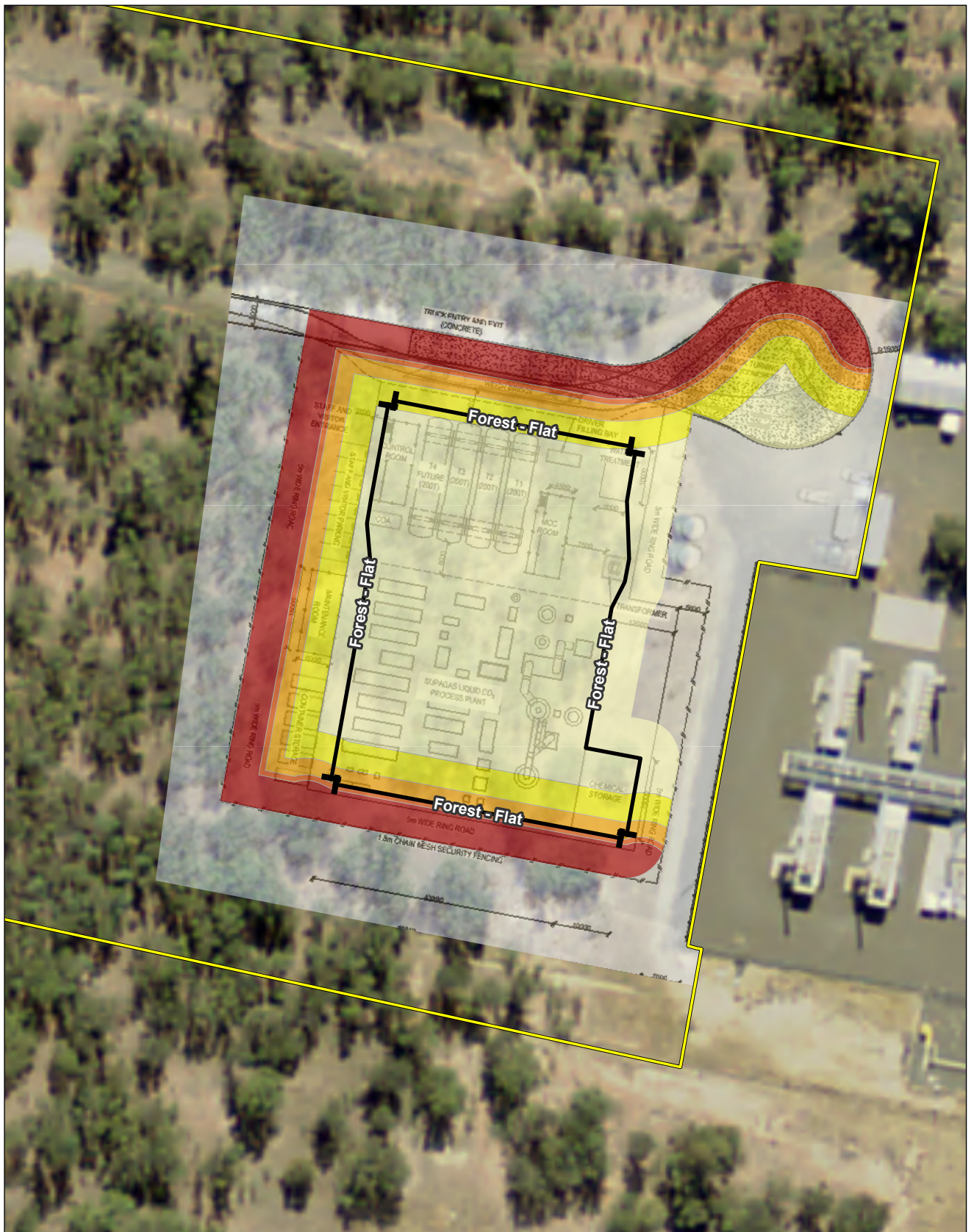
3.3.1 Overview

A Bushfire Attack Level (BAL) as specified within Australian Standard AS 3959-2018 *Construction of buildings in bushfire-prone areas* is typically applied to an enclosed building such as a dwelling, whereby the structure is protected for the sake of a family that may require to shelter in place during fire impact. PBP does not require BALs to be applied to infrastructure buildings or office buildings. As stated within Section 8.3.1 of PBP, the National Construction Code (NCC) does not provide for any bushfire specific performance requirements for the type of use proposed. However, consideration of building construction provisions is required to satisfy the aim and objectives of PBP and the assessment of which is to be made on a case-by-case basis.

3.3.2 BAL for the Project

It is recommended that enclosed buildings (i.e. Maintenance Room, Control Room and MCC Room) be constructed to protect susceptible or vulnerable components from radiant heat and the entry of embers. BAL compliance will also significantly increase the chances of building survival should they be used for shelter on site whereby workers have not been able to evacuate off site prior to the arrival of bushfire attack.

The BALs impacting the Project have been determined in accordance with the 'NBC Bushfire Attack Assessor' (refer to Appendix B for model reports) and are mapped on Figure 11. The mapping shows that the Maintenance Room is impacted by BAL-29 and the Control Room and MCC Room are impacted by BAL-12.5. It is recommended that the design and construction of these rooms comply with the respective BAL specifications listed in *AS 3959-2018 Construction of buildings in bushfire-prone areas*.



Legend

- Interface
- Contour - 10m
- Buffer - 10km
- Buffer - 5km

- Buffer - 1km
- Subject Land
- Bushfire Attack Level**
- BAL Flame Zone

- BAL 40
- BAL 29
- BAL 19
- BAL 12.5

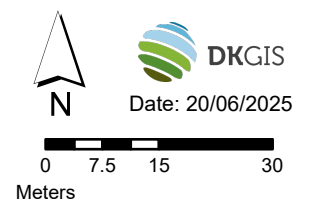


Figure 11: Bushfire Attack Level

Coordinate System: GDA2020 MGA Zone 55

Imagery: © NSW Spatial Services

3.4 Access

3.4.1 Overview

PBP requires safe operational access to structures and water supply for emergency services while occupants are seeking to evacuate the area. PBP also requires fire-fighter access to the perimeter of a development between the asset and the hazard (refer to Section 3.1.1 for discussion on 'defendable space').

3.4.2 The Project

The internal access roads will consist of the formalisation and sealing of part of the site entry road at the Project including turning circle (radius 15 m) and a 5 m wide perimeter ring road within the security fence. Both roads will comply with the standard of 'property access' as listed in Table 5.3b of PBP. The requirements are listed in Table 2 below.

Table 2: PBP standards for property access roads

Standard	Recommendation
<i>Minimum 4m carriageway. Some short constrictions in the access may be accepted where they are not less than 3.5m wide, extend for no more than 30m and where the obstruction cannot be reasonably avoided or removed.</i>	Complies
<i>In forest, woodland and heath situations, rural property roads have passing bays every 200m that are 20m long by 2m wide, making a minimum trafficable width of 6m at the passing bay.</i>	Not required as the perimeter ring road does not exceed 200 m
<i>A minimum vertical clearance of 4m to any overhanging obstructions, including tree branches.</i>	Recommended for the Project
<i>Property access must provide a suitable turning area.</i>	Complies
<i>Curves have a minimum inner radius of 6m and are minimal in number to allow for rapid access and egress.</i>	Recommended for the Project
<i>The minimum distance between inner and outer curves is 6m.</i>	Recommended for the Project
<i>The crossfall is not more than 10 degrees.</i>	Complies
<i>Maximum grades for sealed roads do not exceed 15 degrees and not more than 10 degrees for unsealed roads.</i>	Complies
<i>A development comprising more than three dwellings has access by dedication of a road and not by right of way.</i>	Not applicable to the Project

3.5 Water supply

3.5.1 Overview

An adequate supply of water is essential for fire-fighting purposes during and after the passage of bushfire.

3.5.2 The Project

It is recommended that a water supply be made available to fire-fighters as follows:

- Fitted with 65 mm Storz outlet with a ball valve.
- Truck access and standing area to within 4 m of the outlet.
- Non-combustible construction (e.g. steel or concrete).

3.6 Ignition prevention

3.6.1 Overview

All employees and contractors are responsible for reporting and monitoring fire hazards and for the prevention of fire. The key to minimising fire ignition is to increase the awareness of the risks of ignition.

3.6.2 For the proposal

Table 3 on the following page documents the actions required to raise awareness amongst employees and contractors to help prevent fire ignition. These strategies are especially important during the bushfire season when weather patterns are conducive to the spread of fire.

Table 3: Actions to minimise ignition risk

Factors effecting ignition risk	Action to minimise source
Chemical and fuel storage	• Correct storage of chemicals and fuels as per relevant Australian Standards and EPA guidelines
Cigarette butts	• Correct disposal of cigarette butts where smoking is permitted
Fuel loads	• Review and maintain site in accordance with APZ fuel management standards
Extreme/Catastrophic Fire Danger Days and Total Fire Ban days	• Prohibiting high risk activities such as slashing, off-track driving, hot works etc. during extreme/catastrophic fire danger days
Trespassers	• Secure site from trespass
Lightning strike	• Survey site and property for ignitions after dry storms have passed through
Welding and maintenance	• Maintain high level of employee awareness • Ensure adequate buffer zone between activities and any vegetative fuel source (e.g. grass and other vegetation) • All hot work activities to have a spotter and a fire extinguisher within workzone • No hot work activities on Extreme or Catastrophic Fire Danger Days and Total Fire Ban days
Fuel and exhaust fires	• Maintain high level of employee awareness • Ensure adequate buffer zone between activities and fuel source (e.g. grass and other vegetation) • Ensure all plant or equipment have spark arrestors and are operating without causing backfiring etc
Employees and contractors	• Maintain high level of employee/contractor awareness • Consideration of fire in risk assessment prior to commencing works • Availability of fire suppression equipment, where appropriate
Clearing ignitions	• Maintain high level of employee awareness • Do not undertake mechanical clearing works on Extreme and Catastrophic fire danger days • Maintain suppression equipment at site

3.7 Bushfire emergency management plan

This plan aims to increase the preparedness of the staff to ensure a rapid and safe shelter within the Project or early evacuation off site prior to bushfire impact. It provides a set of procedures to manage an emergency response based on the nature of the bushfire threat and an analysis of the issues that may be encountered during a bushfire emergency.

3.7.1 Shelter on site or evacuation off site

An important element of this plan is that it provides for shelter on site for certain situations where procedural arrangements enable staff to seek refuge within an enclosed building within the Project. The decision to shelter on site or evacuate off site should be reached following the evacuation decision matrix at Table 4 on the following page. Evacuation off site well before the arrival of bushfire impact (including smoke and embers along the chosen route of evacuation) is the primary objective.

The **refuge area for taking shelter on site** will be an enclosed building that complies with AS 3959-2018 *Construction of buildings in bushfire-prone areas*. All enclosed buildings are to be designed and constructed to comply with *Planning for Bush Fire Protection 2019* and therefore have appropriate separation distances to bushfire hazards and construction standards designed to allow shelter in place.

Off-site evacuation location for the property will be Santos Narrabri Gas Project offices and compound at 300 Yarrie Lake Road, Narrabri located via a 12 km drive to the north-east. Off site evacuation may also consist of staff leaving site to head to their place of residence or other area that is considered safe from the impact of bushfire.

Shelter on site should only occur if there is not enough time to safely drive to an off site evacuation point. The decision to evacuate may be guided by NSW Police or Senior Officers of NSW Rural Fire Service. Refer to Appendix C for a guide on how to source key bushfire information such as Fire Danger Ratings (FDR) and Bushfire Alert Levels.

3.7.2 Procedures

1. On sighting of bushfire, call the NSW Rural Fire Service, Namoi/Gwydir Office (Narrabri – 02 6792 3667) or emergency services on '000'.
2. Follow the Evacuation Decision Matrix in Table 4 to determine response.
3. Decision to evacuate of site – all staff and contractors on site are to be notified to evacuate off site to the Santos Narrabri Gas Project office/compound or other safe place. A register is to be logged identifying all staff under evacuation and chosen evacuation location. Off site evacuation can only occur if it can be confirmed that the travel route will not be impacted by the effects of bushfire, including smoke and embers.
4. Decision to shelter on site – all staff are to assemble within an enclosed building until the bushfire has passed and it is safe to exit the building. Sheltering on site is an action of last resort if it has been determined that it is unsafe to leave the site.

3.7.3 Evacuation decision matrix

Table 4: Evacuation Decision Matrix

THREAT	FDR – FIRE DANGER RATING* ¹				
	NO RATING	MODERATE	HIGH	EXTREME	CATASTROPHIC
Fire predicted to impact site	Option to shelter on site	Evacuate off-site if safe to do so* ²	Evacuate off-site if safe to do so* ²	Evacuate off-site if safe to do so* ²	Evacuate off-site if safe to do so* ²
Time to fire impact is less than time required to relocate*³	Last resort. Shelter on site	Last resort. Shelter on site	Last resort. Shelter on site	Last resort. Shelter on site	Last resort. Shelter on site
Fires exist in region but no risk to site*⁴	Specific action not required	Specific action not required	Monitor situation	Monitor situation	Prepare to evacuate off site
No fires	Specific action not required	Specific action not required	Specific action not required	Specific action not required	Prepare to evacuate off site

*¹ FDR can be sourced from NSW Rural Fire Service website for the current day or in the afternoon of the day before ([Fire Danger Ratings and Total Fire Bans - NSW Rural Fire Service](#)). Fire weather information is also available from the Bureau of Meteorology (BoM) website (www.bom.gov.au). The BoM is able to distribute a daily information update regarding the weather forecasts and Fire Danger Rating should this be required by the ECO.

*² Refer to NSW RFS website (<https://www.rfs.nsw.gov.au/fire-information/fires-near-me>) for fire location and current warnings (Bushfire Alert Levels). Evacuate ONLY if safe to do so. Shelter on site if unsafe.

*³ Time to evacuate is the estimated time for staff to relocate to the designated off-site evacuation point.

*⁴ Refer to NSW RFS website or (<https://www.rfs.nsw.gov.au/fire-information/fires-near-me>) for fire location and current warnings (Bushfire Alert Levels). Fires may be located many kilometres away and therefore may only pose a negligible risk. However, under higher FDR precautionary evacuation may be wise because of depleted local fire-fighting resources and the unpredictability of fires at higher FDR.

4 Hazardous industry assessment

Some developments are hazardous by their nature and have the ability to start bushfires. Appropriate protection measures are to be provided commensurate with the hazards and risks. Any fire safety studies prepared under the Hazardous Industry Planning and Assessment Papers (HIPAPs) are to be consulted to determine the hazards and corresponding bushfire protection measures in order to satisfy Section 8.3.9 of PBP.

The Preliminary Hazard Analysis (PHA) prepared by Pando Consulting (12th November 2025) for the application identifies the hazards, including those involving ignition and fire, and assesses each hazard and its potential to spread and cause damage off site. The report recommends safeguards to reduce the potential for incidents, if required.

The PHA (Table 5-4) identified the following potential hazards in regard to ignition and fire spread:

- Fire within the generators within the adjacent Wilga Park Power Station (ID 9), and
- Fire within the substation (ID 12).

The PHA (Table 5-4) states that the controls of separation between asset and external vegetation, fire monitoring, detection and suppression systems, and coordination of emergency response plans apply to both of the above potential hazards and the likelihood was 'unlikely'. The PHA risk assessment at Table 6-1 states a risk rating of 'medium' for both potential hazards.

Based on the PHA, it can be established that the potential ignition and fire impacts related to external risk do not require specific bushfire protection measures beyond those already provided and recommended throughout Sub-sections 3.1 to 3.7 of this report and those recommended in the PHA.

5 Conclusion and recommendations

5.1 Summary

The Project is situated on bushfire prone land and is at risk of bushfire from the surrounding Pilliga Outwash DSF. Conversely, there is potential, albeit limited, for fire to initiate within the Project area and spread off site to threaten external assets.

Bushfire protection measures have been recommended to address the bushfire risk, minimise bushfire impact on the proposed assets and existing assets. A 'measures in combination' approach is proposed as required by PBP. The proposed measures are commensurate with the bushfire hazard and risk identified and the susceptibility of the Project and surrounding areas.

The bushfire protection measures fall within the following groups:

- Asset Protection Zones (APZ) – Section 3.1
- Vegetation management – Section 3.2
- Building construction – Section 3.3
- Access for fire-fighting – Section 3.4
- Water supply for fire-fighting – Section 3.5
- Ignition prevention – Section 3.6
- Bushfire emergency management plan – Section 3.7

5.2 Conclusion

This assessment satisfies the SEARs requirement to identify potential hazards and risks associated with bushfires and to demonstrate compliance with PBP. Integrating the recommendations in Section 5.3 (Table 5) below into the design would achieve the requirements of the SEARs, the objective of Section 8.3.9 of PBP and the aim and objectives of PBP.

5.3 Recommendations

Table 5 on the following page lists the bushfire protection recommendations made within this report. The recommendations are to be adopted by design in order to comply with the SEARs and PBP.

Table 5: Recommendations

Recommendation No.	Recommendation	Report section
1	The site within the security fence is to be managed to an APZ standard (refer to Recommendation 2).	3.1
2	The following fuel specifications should be adopted to achieve an IPA standard for the Project: <u>Trees</u> • Trees at maturity should not touch or overhang assets. • Tree canopies should not be connected when at maturity. Gaps between crowns or groups of crowns are to be maintained at distances of at least 5 m. <u>Shrubs</u> • Shrubs should not be planted within the Project area. <u>Groundcovers</u> • Grass should be regularly mown or slashed. • Organic mulch is not to be used within 2 m of infrastructure.	3.2
3	The Maintenance Room is to be designed and constructed to comply with BAL-29 in accordance with <i>AS 3959-2018 Construction of buildings in bushfire prone areas</i> . The Control Room and MCC Room are to comply with BAL-12.5.	3.3
4	All internal access roads are to comply with the relevant provisions of 'property access' as listed in Table 5.3b of PBP. Those items from table 5.3b that are required to be integrated into the design are listed below: • <i>A minimum vertical clearance of 4m to any overhanging obstructions, including tree branches.</i> • <i>Curves have a minimum inner radius of 6m and are minimal in number to allow for rapid access and egress.</i> • <i>The minimum distance between inner and outer curves is 6m.</i>	3.4
5	It is recommended that a water supply be made available to fire-fighters as follows:	3.5

Recommendation No.	Recommendation	Report section
	- Fitted with 65 mm Storz outlet with a ball valve. - Truck access and standing area to within 4 m of the outlet. - Non-combustible construction (e.g. steel or concrete).	
6	The actions listed in Table 3 are to be followed by employees and contractors to help prevent fire ignition.	3.6
7	The Bushfire Emergency Management Plan at Section 3.7 is to be followed by employees and contractors.	3.7



David Peterson
Director



References

McArthur, A.G. 1967. *Fire behaviour in eucalypt forests*. Australian Forestry and Timber Bureau Leaflet, no. 100.

Narrabri-Gwydir Bush Fire Management Committee 2018. *Narrabri-Gwydir Bush Fire Risk Management Plan*. <https://www.rfs.nsw.gov.au/plan-and-prepare/know-your-risk/bush-fire-risk-management-plans>

NSW Rural Fire Service (RFS) 2019. *Comprehensive vegetation fuel loads*. State of New South Wales through the NSW Rural Fire Service.

NSW Rural Fire Service (RFS) 2019. *Planning for Bush Fire Protection: A Guide for Councils, Planners, Fire Authorities and Developers*. State of New South Wales through the NSW Rural Fire Service.

Standards Australia 2018. *Construction of buildings in bushfire-prone areas*, AS 3959, Standards Australia International Ltd, Sydney.

Appendix A - Photographs



Photograph 1: Project site with Wilga Park Power Station to the east



Photograph 2: Pilliga Outwash DSF to the north of the Project



Photograph 3: Pilliga Outwash DSF to the west of the Project



Photograph 4: Pilliga Outwash DSF to the south of the Project



Photograph 5: Entry road adjacent the Project



Photograph 6: Site entry gate on Kiandool Lane



Photograph 7: Kiandool Lane

Appendix B – Model reports



NBC Bushfire Attack Assessment Report V4.1

AS3959 (2018) Appendix B - Detailed Method 2

Print Date: 23/06/2025

Assessment Date: 20/06/2025

Site Street Address: Wilga Park Power Station, Bohena Creek

Assessor: David Peterson; Peterson Bushfire

Local Government Area: Narrabri

Alpine Area: No

Equations Used

Transmissivity: Fuss and Hammins, 2002

Flame Length: RFS PBP, 2001/Vesta/Catchpole

Rate of Fire Spread: Noble et al., 1980

Radiant Heat: Drysdale, 1985; Sullivan et al., 2003; Tan et al., 2005

Peak Elevation of Receiver: Tan et al., 2005

Peak Flame Angle: Tan et al., 2005

Run Description: 1. BAL-FZ

Vegetation Information

Vegetation Type: Pilliga Outwash DSF

Vegetation Group: Dry Sclerophyll Forests (Shrub/Grass)

Vegetation Slope: 0 Degrees

Vegetation Slope Type: Level

Surface Fuel Load(t/ha): 7

Overall Fuel Load(t/ha): 11.05

Vegetation Height(m): 0.9

Only Applicable to Shrub/Scrub and Vesta

Site Information

Site Slope: 0 Degrees

Site Slope Type: Level

Elevation of Receiver(m): Default

APZ/Separation(m): 6

Fire Inputs

Veg./Flame Width(m): 100

Flame Temp(K): 1090

Calculation Parameters

Flame Emissivity: 95

Relative Humidity(%): 25

Heat of Combustion(kJ/kg) 18600

Ambient Temp(K): 308

Moisture Factor: 5

FDI: 80

Program Outputs

Level of Construction: BAL 40

Peak Elevation of Receiver(m): 2.51

Radiant Heat(kW/m2): 31.91

Flame Angle (degrees): 62

Flame Length(m): 5.69

Maximum View Factor: 0.474

Rate Of Spread (km/h): 0.67

Inner Protection Area(m): 6

Transmissivity: 0.885

Outer Protection Area(m): 0

Fire Intensity(kW/m): 3837

Run Description:		3. BAL-29 APZ	
<u>Vegetation Information</u>			
Vegetation Type:		Pilliga Outwash DSF	
Vegetation Group:		Dry Sclerophyll Forests (Shrub/Grass)	
Vegetation Slope:		0 Degrees	Vegetation Slope Type: Level
Surface Fuel Load(t/ha):		7	Overall Fuel Load(t/ha): 11.05
Vegetation Height(m):		0.9	Only Applicable to Shrub/Scrub and Vesta
<u>Site Information</u>			
Site Slope:		0 Degrees	Site Slope Type: Level
Elevation of Receiver(m):		Default	APZ/Separation(m): 7
<u>Fire Inputs</u>			
Veg./Flame Width(m):		100	Flame Temp(K): 1090
<u>Calculation Parameters</u>			
Flame Emissivity:		95	Relative Humidity(%): 25
Heat of Combustion(kJ/kg)		18600	Ambient Temp(K): 308
Moisture Factor:		5	FDI: 80
<u>Program Outputs</u>			
Level of Construction:		BAL 29	Peak Elevation of Receiver(m): 2.6
Radiant Heat(kW/m2):		27.19	Flame Angle (degrees): 66
Flame Length(m):		5.69	Maximum View Factor: 0.406
Rate Of Spread (km/h):		0.67	Inner Protection Area(m): 7
Transmissivity:		0.88	Outer Protection Area(m): 0
Fire Intensity(kW/m):		3837	

Run Description:		4. BAL-19	
<u>Vegetation Information</u>			
Vegetation Type:		Pilliga Outwash DSF	
Vegetation Group:		Dry Sclerophyll Forests (Shrub/Grass)	
Vegetation Slope:		0 Degrees	Vegetation Slope Type: Level
Surface Fuel Load(t/ha):		7	Overall Fuel Load(t/ha): 11.05
Vegetation Height(m):		0.9	Only Applicable to Shrub/Scrub and Vesta
<u>Site Information</u>			
Site Slope:		0 Degrees	Site Slope Type: Level
Elevation of Receiver(m):		Default	APZ/Separation(m): 10
<u>Fire Inputs</u>			
Veg./Flame Width(m):		100	Flame Temp(K): 1090
<u>Calculation Parameters</u>			
Flame Emissivity:		95	Relative Humidity(%): 25
Heat of Combustion(kJ/kg)		18600	Ambient Temp(K): 308
Moisture Factor:		5	FDI: 80
<u>Program Outputs</u>			
Level of Construction:		BAL 19	Peak Elevation of Receiver(m): 2.72
Radiant Heat(kW/m2):		18.72	Flame Angle (degrees): 73
Flame Length(m):		5.69	Maximum View Factor: 0.284
Rate Of Spread (km/h):		0.67	Inner Protection Area(m): 10
Transmissivity:		0.867	Outer Protection Area(m): 0
Fire Intensity(kW/m):		3837	

Run Description:	5. BAL-12.5		
<u>Vegetation Information</u>			
Vegetation Type:	Pilliga Outwash DSF		
Vegetation Group:	Dry Sclerophyll Forests (Shrub/Grass)		
Vegetation Slope:	0 Degrees	Vegetation Slope Type:	Level
Surface Fuel Load(t/ha):	7	Overall Fuel Load(t/ha):	11.05
Vegetation Height(m):	0.9	Only Applicable to Shrub/Scrub and Vesta	
<u>Site Information</u>			
Site Slope:	0 Degrees	Site Slope Type:	Level
Elevation of Receiver(m):	Default	APZ/Separation(m):	15
<u>Fire Inputs</u>			
Veg./Flame Width(m):	100	Flame Temp(K):	1090
<u>Calculation Parameters</u>			
Flame Emissivity:	95	Relative Humidity(%):	25
Heat of Combustion(kJ/kg)	18600	Ambient Temp(K):	308
Moisture Factor:	5	FDI:	80
<u>Program Outputs</u>			
Level of Construction:	BAL 12.5	Peak Elevation of Receiver(m):	2.79
Radiant Heat(kW/m2):	12.13	Flame Angle (degrees):	79
Flame Length(m):	5.69	Maximum View Factor:	0.188
Rate Of Spread (km/h):	0.67	Inner Protection Area(m):	15
Transmissivity:	0.848	Outer Protection Area(m):	0
Fire Intensity(kW/m):	3837		

Appendix C – Sourcing information

Key information

				
In an emergency call Triple Zero (000) For information on bush fire, call the Bush Fire Information Line 1800 NSW RFS (1800 679 737)	NSW Rural Fire Service Website: rfs.nsw.gov.au Fire Danger Ratings: rfs.nsw.gov.au/fdr	'Fires Near Me' Free smartphone app.	Local radio, local ABC/emergency broadcaster frequency, TV, newspapers	facebook.com/nswrfs twitter.com/nswrfs

Fire Danger Ratings (FDR)

Before a fire even starts, monitor the Fire Danger Ratings daily at [Fire Danger Ratings and Total Fire Bans - NSW Rural Fire Service](#). The higher the fire danger rating, the more dangerous a fire is likely to be.

 **Key to Fire Danger Ratings**

	NO RATING	No rating issued
	MODERATE	Plan and prepare
	HIGH	Be ready to act
	EXTREME	Take action now to protect your life and property
	CATASTROPHIC	For your survival, leave bush fire risk areas

 **Total Fire Ban – There is total fire ban in place**

Bushfire Alert Levels

If there is a fire in the area you will find its Bushfire Alert Level on the NSW RFS website, on the radio and on the 'Fires Near Me' app. You need to keep track of the alert level so you know what you should do.



Advice

A fire has started. There is no immediate danger. Stay up to date in case the situation changes.



Watch And Act

There is a heightened level of threat. Conditions are changing and you need to start taking action now to protect you and your family.



Emergency Warning

An Emergency Warning is the highest level of Bush Fire Alert. You may be in danger and need to take action immediately. Any delay now puts your life at risk.

For some fires, you may hear a warning message over your radio or television, such as a siren, or you may receive an [Emergency Alert text message or phone call](#). Other fires may start so quickly that there will be no time for any warning at all.

