



File Ref. No: FRN16/1489  
TRIM Ref. No: B16/978

Independent Pricing and Regulatory Tribunal  
Level 8, 1 Market Street  
Sydney NSW 2000

29 July 2016

Dear Sir / Madam

**RE: END OF TERM REVIEW OF HUNTER WATER CORPORATION  
OPERATING LICENCE**

Under the provisions of Section 6 of the *Fire Brigades Act 1989* it is the duty of the Commissioner of Fire & Rescue NSW (FRNSW) to take all practicable measures for preventing and extinguishing fires and protecting and saving life and property in case of fire in any fire district. A fundamental requirement to do so is the existence of a reticulated water supply, with sufficient pressure and volume, and accessible via fire hydrants, so that water can be applied rapidly and continuously onto the fire.

As such, FRNSW crews are almost entirely dependent on reticulated water infrastructure and supply installed and maintained by Hunter Water to undertake legislated community safety responsibilities.

The National Construction Code Series Building Code of Australia Volume 2 has no requirement for the provision of private fire hydrants when FRNSW crews respond to fires within Class 1 buildings (typically residential housing). FRNSW crews are dependent on on-board water supplies (just 2000 litres – intended to enable fast attack while hydrant supplies are established). Therefore, the reticulated water supply and infrastructure is crucial to the saving of life and property.

Where FRNSW crews are required to respond to fires in Class 2 to 9 building, requirements for private fire hydrants are defined by the National Construction Code Series Building Code of Australia Volume 1 and Australian Standard AS 2419.1—2005. Notwithstanding, the type and configuration of the fire hydrant system is largely determined by the characteristics of the available town main. In circumstances where appropriate minimum pressures and flows are not provided in the town main, under the provisions of AS 2419.1—2005, fire hydrant systems more suitable for the firefighting operations at large industrial complexes may be required to be installed in residential class 2 and class 3 buildings. This would be a very significant cost burden.



FRNSW has a reasonable expectation based on longstanding custom and practice in the area, that the Hunter Water network will support the protection of life and property and effective firefighting operations through the provision of fire hydrants with appropriate water pressures and flows.

Any departure from this longstanding community obligation, shared by all water authorities in the western world, would require a very expensive re-organisation of the fire services which would have to provide larger fire engines with increased water carrying capacities, more firefighters and more fire stations.

With the advent of the pressure management program by water authorities, FRNSW have observed pressures and flows in networks that do not appropriately support FRNSW intervention activities.

In areas where insufficient pressures and flows are provided the implications for the community include possible delays in fire brigade intervention resulting in increased property loss and perhaps injuries and deaths.

FRNSW therefore strongly recommends that the operating licence of Hunter Water incorporate an ongoing community safety obligation and requirement to provide minimum pressures and flows across its network to facilitate fire brigade intervention as well as hydrants placed at regular intervals to facilitate access.

With reference to the comments made above, FRNSW recommend that IPART place similar obligations in the next Hunter Water Corporation operating licence to those recently placed on the Sydney Water Corporation with regard to the development of a Memorandum of Understanding with FRNSW.

Yours sincerely

  
Greg Mullins AFSM  
Commissioner  
Fire & Rescue NSW

