

Attachment F

**Inspection Report
180 Pitt Street, Waterloo**



Figure 1: 180 Pitt Street, Waterloo, viewed from the north-east



Figure 2: Location map of 180 Pitt Street, Waterloo

Council Investigation Officer Inspection and Recommendation Report; Clause 17(2) Part 8 of Schedule 5 of the Environmental Planning and Assessment Act 1979 (the Act)

Officer: Joe Kalgovas

Date: 7 August 2025

Premises: 180 Pitt Street, Waterloo

Executive Summary

1. The City received correspondence from the Commissioner of Fire and Rescue NSW (FRNSW) in relation to the subject premises dated 5 June 2025 with respect to matters of fire safety.
2. The premises consists of a 17-storey building used for residential accommodation.
3. The City inspected the premises on 13 June 2025 unaccompanied and on 1 August 2025, accompanied by Homes NSW Compliance Supervisor, contractors and Fire Engineer. This inspection identified deficiencies in fire safety. To address this, a fire safety order (order) is recommended to be issued under the Act.

Chronology

Date	Event
10 June 2025	FRNSW correspondence received
13 June 2025	The City inspected the premises
1 August 2025	The City inspected the premises with Homes NSW staff
6 August 2025	A Notice of Intention (NOI) was issued on 6 August 2025.

Fire and Rescue NSW Report

4. Fire and Rescue NSW conducted an inspection of the subject premises on 20 May 2025.

Issues

5. The NSW Land and Housing Corporation (LAHC) owns and manages the premises. The LAHC is a self-funded Public Trading Enterprise, governed by the Housing Act 2001, and is part of the NSW Government's Department of Planning, Housing and Infrastructure (DPHI).
6. FRNSW have referred their inspection report directly to the Compliance branch of the DPHI for the appropriate action.
7. The investigation has confirmed that Crown land that is leased or licenced under the Crown Land Management Act 2016 to a NSW Government agency, such as under a commercial lease for an office building, is not Crown managed land and as such a Development Control Order may be issued in respect of that land or building.
8. The report from Fire and Rescue NSW detailed issues as shown in the table below.

Ref.	Issue	City response
1	Essential Fire Safety Measures	
1A	Fire Indicator Panel (FIP) – Observations of the FIP were consistent with the logbook entries. No faults or isolations were displayed. However, the following is noted:	
	A. The Alarm Signalling Equipment (ASE) displayed that the secondary connection was at fault whilst the primary connection was normal.	One link found. Secondary connection to be provided. A notice of intention was issued on 6 August 2025.
	B. The service provider was called during the inspection. The provider advised that their records do not list a secondary connection.	Secondary connection to be provided. A notice of intention was issued on 6 August 2025.
1B	Alarm Signalling Equipment (ASE)—The Australian Standard AS1670.3 specifies that the ASE communicates with a monitoring service (service fails or is unavailable, the ASE will seize the secondary (backup) link and report via this link until the primary link is restored. A review of the development consent may be required to determine why a secondary link is not listed on the service provider's records.	
1C	Emergency Warning and Intercommunication System (EWIS) – Observations of the EWIS were consistent with the logbook entries. Line faults were observed as described in the logbook.	
1D	Access to the pump room revealed the following observations:	
	A. The secondary pump includes an “Out of Service” tag dated 1 May 2025. The tag states, “Coolant leak from head gasket.” Consistent logbook entries confirmed testing and inspections.	Secondary pump to be reinstated. A notice of intention was issued on 6 August 2025.

Ref.	Issue	City response
	B. The spare sprinkler box requires restocking of all items.	Missing spares heads. Spare sprinkler box to be restocked. A notice of intention was issued on 6 August 2025.
1E	Sprinkler System—Clause 2.13 of Australian Standard AS2118.6- 2012 permits each sprinkler isolating valve, fire main isolating valve, and any valve capable of isolating the water supply to the system to be monitored separately in accordance with Australian Standards AS2118.1 and AS2419.1 at the Fire Indicator Panel (FIP). During the inspection, pilot-operated pressure reduction valves (PO-PRV) were noted within the Sprinkler System. It remains unclear whether the PO-PRV is monitored at the FIP.	Monitoring is currently grouped. Separate monitoring of PO-PRV at the FIP is to be provided. A notice of intention was issued on 6 August 2025.
1F	Pilot-operated pressure reduction valve (PO-PRV)—If a PO-PRV is installed within a fire hydrant and/or sprinkler system, the pilot tube isolating valve could inadvertently remain closed. If the PO-PRV is not monitored at the FIP, it remains closed and prevents water flow through the PO-PRV during a fire. Reviewing the development approval records may be necessary to confirm compliance with Performance Requirements E1P3 Fire Hydrants and/or E1P4 Automatic fire suppression systems in accordance with NCC.	Monitoring of PO-PRV at the FIP in accordance with AS 2118.6 is to be provided. A notice of intention was issued on 6 August 2025.
1G	FRNSW Position Statement (PO-PRV)—Any changes to Essential Fire Safety systems are deemed 'structural work' and thus require appropriate construction approval. Consequently, FRNSW recommends that if compliance is required, the work may necessitate either valve removal, locking the valve open and monitoring it, or replacing the PO-PRV with one that does not have an isolating valve. Furthermore, FRNSW does not endorse the disabling or removing of the isolating valve lever as a temporary measure because the lever's position is a visual indicator of the valve's status (i.e.	Monitoring of PO-PRV at the FIP in accordance with AS 2118.6 is to be provided. A notice of intention was issued on 6 August 2025

Ref.	Issue	City response
	open or closed) for firefighters and maintenance personnel.	
1H	Access to the booster assembly cabinet facing Pitt Street revealed the following observations:	
	A. The standard 003 key could not open the cabinet on the left-hand side (LHS). However, the cabinet on the right-hand side (RHS) could be opened.	Both cabinets were opened by 003 key. Access to both cabinets is to be maintained. A notice of intention was issued on the 6/8/25
	B. The hold-open devices were damaged, and the doors to the cabinet on the RHS could not be held in the open position, allowing both door leaves to possibly swing freely during windy conditions.	Operational hold-open devices are to be provide to the cabinet. A notice of intention was issued on 6 August 2025.
	C. The inability to open the LHS without further damaging the door prevented a full view of the booster assembly, making the observations incomplete.	Noted. No action required.
2	Access and Egress	
2A	An inspection of the floors identified in the 'EWS and EIS' logbook entries and the EWIS panel revealed the following observations:	
	A. The areas accessed were generally clear, with no observed hindrances to exiting the building from the hallways. However, many areas were vandalised or graffitied.	Inspection did not identify any hindrances.
	B. Some face plates for the Building Occupant Warning System speakers in the hallways were damaged; however, all were still attached to the speaker bracket and mount.	All damaged speaker face plates are to be replaced. A notice of intention was issued on 6 August 2025.
	C. During the inspection, the fire-isolated stairs between the floors were clear of obstructions, and the final exit door leading to Pitt Street was clear.	Noted. No action required
	D. The signs identifying the fire doors and fire-isolated stairs specified under D3D28 of the NCC were removed, damaged, or interfered with, making the signs attached to the door at times illegible.	Signage was found missing and damaged. All signage identifying doors and stairways specified by D3D28 is to be rectified. A notice of intention was issued on 6 August 2025

Ref.	Issue	City response
	E. The exit signs specified under E4D5 and ED6 of the NCC were either removed or damaged, or the face decals were removed.	Most signage was found to be damaged. All exit signage is to be reinstated to comply with E4D5 and E4D6. A notice of intention was issued on 6 August 2025
3	Generally	
3A	Annual Fire Safety Statement (AFSS) – Regulation 89(4)(b) of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 (EPAR 2021) requires the owner to display a current AFSS within the building. The AFSS for the premises could not be located and was not shown in a prominent place.	No AFSS displayed. AFSS to be displayed in lobby. A notice of intention was issued on the 6/8/25
3B	Fire Safety Notice—Regulation 108 of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 (EPAR 2021) requires a fire safety notice to be displayed in a prominent position on a fire-isolated stairway, passageway, or ramp. The notice “OFFENCE RELATING TO FIRE EXITS” on numerous storeys appeared to have been removed/damaged/interfered with.	Most signage was found to be damaged or removed. Fire safety notices to be provided. A notice of intention was issued on 6 August 2025.
3C	The Crown may need to ensure that a practitioner continues to assess, inspect and verify the performance of each fire safety measure (including exits) that applies to the building. Furthermore, the Crown displays a current Annual Fire Safety Statement (AFSS) as part of its obligations under the EP&A Act.	Noted. No action required.
3D	FRNSW acknowledges that the observations at the time may relate to the building’s age and difficulties in maintenance. However, the following ‘Performance Requirements’ from the Building Code of Australia may require the Crown’s review to demonstrate the minimum ongoing fire safety compliance (the details are provided for the Council to note for its records):	
	A. D1P2 Safe movement to and within a building	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.

Ref.	Issue	City response
	B. D1P3 Fall prevention barriers	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.
	C. D1P4 Exits	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.
	D. D1P5 Fire-isolated exits	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.
	E. E1P2 Fire extinguishers	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.
	F. E1P3 Fire hydrants	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.
	G. E1P4 Automatic fire suppression systems	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.
	H. E2P1 Automatic warning for sleeping occupants	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.
	I. E2P2 Safe evacuation routes	Required works subject to detail audit. A notice of intention was issued on 6 August 2025.
3E	The project officer for maintenance of Essential Fire Safety Measures for LAHC has been informed in writing regarding the Secondary Pump being offline and the line faults to the EWIS on 21 May 2025.	Noted. No action required

9. FRNSW have made no direct recommendation within their report other than legislative notification and advised that the details are provided for the Council to note for its records.

Council Investigation Officer Recommendations

10. As a result of site inspections undertaken by the Council investigation officer, due to fire safety concerns a Notice of Intention (NOI) to give a fire safety order under the Act was issued on 6 August 2025. After the representation period and consideration of any responses, a fire safety order may be issued to ensure adequate fire safety systems are in place throughout the building.
11. It is recommended that the Commissioner of FRNSW be informed of the City's decision.

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File Ref. No: FRN16/1307 - BFS24/5454 - 8000037611
TRIM Ref. No: D25/61445
Contact: Edren Ravino

5 June 2025

General Manager
City of Sydney
GPO Box 1591
SYDNEY NSW 2001

Email: council@cityofsydney.nsw.gov.au

Attention: Manager Compliance/Fire Safety

Dear General Manager

**Re: INSPECTION REPORT
'DANIEL SOLANDER'
180 PITT STREET WATERLOO (hereafter "the premises")**

Fire & Rescue NSW (FRNSW) received correspondence on 24 August 2024 concerning the adequacy of the provision for fire safety in connection with the premises.

The correspondence stated that:

Regular fire alarms with no apparent reason - they are so common that even when they go on for upwards of 20 or 30 minutes, no one comes out of the buildings.

What's happens if there's actually a fire? The system is so obviously faulty that the people in the buildings don't trust them.

Pursuant to the provisions of 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 Fire and Rescue NSW (FRNSW) inspected the premises on 20 May 2025. On behalf of the Commissioner of FRNSW, the comments in this report are provided under Section 9.32(4).

The items listed in this report's comments are based on the Provisions for Fire Safety and Fire Fighting Equipment, and they are limited to a visual inspection of the parts in the building accessed and the fire safety measures observed at the time.

Fire and Rescue NSW

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Community Safety Directorate
Fire Safety Compliance Unit

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COMMENTS

All matters requiring construction work (Part 6 of the EP&A Act) or enforcement (Section 9.35 of the EP&A Act) require the Minister's concurrence. As such, compliance with the relevant Performance Requirements of the National Construction Code 2022, Volume 1 Building Code of Australia (NCC), general housekeeping and maintenance of the essential fire safety measures observed in this report are at the Crown's discretion to address for the following reasons (the details are provided for the Council to note for its records) :

- The NSW Land and Housing Corporation (LAHC) owns and manages the premises. The LAHC is a self-funded Public Trading Enterprise, governed by the *Housing Act 2001*, and is part of the NSW Government's Department of Planning and Environment (DPE).
- While LAHC operates commercially, it's part of the NSW Government's DPE and manages social housing properties. Under Section 3.3 of the *Crown Land Management Act*, the LAHC is considered a "Crown Land Manager" as it manages "Social Housing" on Crown land.

Entry to the premises was provided by the security guard behind the glass-enclosed concierge desk on the ground floor, including access to records. As a result, the following is provided as part of this report:

- Officers viewed the "Fire Detection and Alarm Systems" logbook and the "Emergency Warning Systems (EWS) and Emergency Intercom Systems (EIS)" logbook. Both books showed regular testing and inspections.
- Audio line faults were listed in the 'EWS and EIS' logbook, identifying the faults as a 'Non Critical Defect.' The entry in the logbook identified the faults on 'level 4 north/south, level 8 south and level 14 south' dating back to March 2025.
- No faults were listed in the "Fire Detection and Alarm Systems" logbook.
- The Annual Fire Safety Statement (AFSS) was not among the essential fire safety records and could not be provided.

The following items were identified during the inspection:

1. Essential Fire Safety Measures

- 1A. Fire Indicator Panel (FIP) – Observations of the FIP were consistent with the logbook entries. No faults or isolations were displayed. However, the following is noted:
 - A. The Alarm Signalling Equipment (ASE) displayed that the secondary connection was at fault whilst the primary connection was normal.
 - B. The service provider was called during the inspection. The provider advised that their records do not list a secondary connection.
- 1B. Alarm Signalling Equipment (ASE)—The Australian Standard AS1670.3 specifies that the ASE communicates with a monitoring service (service provider) using a primary and secondary (backup) link. If the primary link

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fails or is unavailable, the ASE will seize the secondary (backup) link and report via this link until the primary link is restored. A review of the development consent may be required to determine why a secondary link is not listed on the service provider's records.

- 1C. Emergency Warning and Intercommunication System (EWIS) – Observations of the EWIS were consistent with the logbook entries. Line faults were observed as described in the logbook.
- 1D. Access to the pump room revealed the following observations:
 - A. The secondary pump includes an "Out of Service" tag dated 1 May 2025. The tag states, "Coolant leak from head gasket." Consistent logbook entries confirmed testing and inspections.
 - B. The spare sprinkler box requires restocking of all items.
- 1E. Sprinkler System—Clause 2.13 of Australian Standard AS2118.6- 2012 permits each sprinkler isolating valve, fire main isolating valve, and any valve capable of isolating the water supply to the system to be monitored separately in accordance with Australian Standards AS2118.1 and AS2419.1 at the Fire Indicator Panel (FIP). During the inspection, pilot-operated pressure reduction valves (PO-PRV) were noted within the Sprinkler System. It remains unclear whether the PO-PRV is monitored at the FIP.
- 1F. Pilot-operated pressure reduction valve (PO-PRV)—If a PO-PRV is installed within a fire hydrant and/or sprinkler system, the pilot tube isolating valve could inadvertently remain closed. If the PO-PRV is not monitored at the FIP, it remains closed and prevents water flow through the PO-PRV during a fire. Reviewing the development approval records may be necessary to confirm compliance with Performance Requirements E1P3 Fire Hydrants and/or E1P4 Automatic fire suppression systems in accordance with NCC.
- 1G. FRNSW Position Statement (PO-PRV)—Any changes to Essential Fire Safety systems are deemed 'structural work' and thus require appropriate construction approval. Consequently, FRNSW recommends that if compliance is required, the work may necessitate either valve removal, locking the valve open and monitoring it, or replacing the PO-PRV with one that does not have an isolating valve. Furthermore, FRNSW does not endorse the disabling or removing of the isolating valve lever as a temporary measure because the lever's position is a visual indicator of the valve's status (i.e. open or closed) for firefighters and maintenance personnel.
- 1H. Access to the booster assembly cabinet facing Pitt Street revealed the following observations:
 - A. The standard 003 key could not open the cabinet on the left-hand side (LHS). However, the cabinet on the right-hand side (RHS) could be opened.

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- B. The hold-open devices were damaged, and the doors to the cabinet on the RHS could not be held in the open position, allowing both door leaves to possibly swing freely during windy conditions.
- C. The inability to open the LHS without further damaging the door prevented a full view of the booster assembly, making the observations incomplete.

2. Access and Egress

- 2A. An inspection of the floors identified in the 'EWS and EIS' logbook entries and the EWIS panel revealed the following observations:
 - A. The areas accessed were generally clear, with no observed hindrances to exiting the building from the hallways. However, many areas were vandalised or graffitied.
 - B. Some face plates for the Building Occupant Warning System speakers in the hallways were damaged; however, all were still attached to the speaker bracket and mount.
 - C. During the inspection, the fire-isolated stairs between the floors were clear of obstructions, and the final exit door leading to Pitt Street was clear.
 - D. The signs identifying the fire doors and fire-isolated stairs specified under D3D28 of the NCC were removed, damaged, or interfered with, making the signs attached to the door at times illegible.
 - E. The exit signs specified under E4D5 and ED6 of the NCC were either removed or damaged, or the face decals were removed.

3. Generally

- 3A. Annual Fire Safety Statement (AFSS) – Regulation 89(4)(b) of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 (EPAR 2021) requires the owner to display a current AFSS within the building. The AFSS for the premises could not be located and was not shown in a prominent place.
- 3B. Fire Safety Notice—Regulation 108 of the Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 (EPAR 2021) requires a fire safety notice to be displayed in a prominent position on a fire-isolated stairway, passageway, or ramp. The notice "OFFENCE RELATING TO FIRE EXITS" on numerous storeys appeared to have been removed/damaged/interfered with.
- 3C. The Crown may need to ensure that a practitioner continues to assess, inspect and verify the performance of each fire safety measure (including exits) that applies to the building. Furthermore, the Crown displays a current Annual Fire Safety Statement (AFSS) as part of its obligations under the EP&A Act.

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- 3D. FRNSW acknowledges that the observations at the time may relate to the building's age and difficulties surrounding maintenance for social housing. However, the following 'Performance Requirements' from the Building Code of Australia may require the Crown's review to demonstrate the minimum ongoing fire safety compliance (the details are provided for the Council to note for its records):
- A. D1P2 Safe movement to and within a building
 - B. D1P3 Fall prevention barriers
 - C. D1P4 Exits
 - D. D1P5 Fire-isolated exits
 - E. E1P2 Fire extinguishers
 - F. E1P3 Fire hydrants
 - G. E1P4 Automatic fire suppression systems
 - H. E2P1 Automatic warning for sleeping occupants
 - I. E2P2 Safe evacuation routes
- 3E. The project officer for maintenance of Essential Fire Safety Measures for LAHC has been informed in writing regarding the Secondary Pump being offline and the line faults to the EWIS on 21 May 2025.

Please do not hesitate to contact Edren Ravino of FRNSW's Fire Safety Compliance Unit at FireSafety@fire.nsw.gov.au or call (02) 9742 7434 if you have any questions or concerns regarding the above matters. Please refer to the file reference FRN16/1307 - BFS24/5454 - 8000037611 for any future correspondence concerning this matter.

Yours faithfully



Edren Ravino
Senior Building Surveyor
Fire Safety Compliance Unit

CC: Department of Planning, Housing and Infrastructure
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Parramatta NSW 2124
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