



Bushfire Protection Assessment

New High School for Wilton

NSW Department of Education (DoE)

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LIMITATIONS

The bushfire protection measures recommended in this report do not completely remove the risk to life and property, and they do not guarantee that a development will not be impacted by a bushfire event. This is substantially due to the degree of vegetation management, the unpredictable nature and behaviour of fire, and extreme weather conditions.

Acknowledgements

This document has been prepared by Eco Logical Australia Pty Ltd with assistance from NSW Department of Education (DoE).

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Template 2.8.1

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Abbreviations

Abbreviation	Description
APZ	Asset protection zone
BAL	Bushfire Attack Level
BFPL	Bush fire prone land
BPA	Bushfire Protection Assessment
BMM	Bushfire Mitigation Measure
BPM	Bushfire protection measures
BFSA	Bush Fire Safety Authority
CC	Construction Certificate
DoE	NSW Department of Education
DPHI	Department of Planning, Housing and Infrastructure
EFSG	Educational Facilities Standards and Guidelines
ELA	Eco Logical Australia Pty Ltd
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
FDI	Fire Danger Index
GIS	Geographic information system
ha	hectares
IPA	Inner Protection Area
LGA	Local Government Area
m	metres
PBP	'Planning for Bush Fire Protection 2019', 'Addendum to Planning for Bush Fire Protection 2022' and 'Addendum to Planning for Bush Fire Protection 2025'
REF	Review of Environmental Factors
RFS	NSW Rural Fire Service
RF Act	<i>Rural Fires Act 1979</i>
SFPP	Special fire protection purpose
SI	School Infrastructure
T&I SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>

1. Introduction

This Bushfire Protection Assessment (BPA) has been prepared to support a Review of Environmental Factors (REF) for the NSW Department of Education (DoE) for the construction and operation of the new high school for Wilton (the activity).

The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) as “development permitted without consent” on land carried out by or on behalf of a public authority under Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37A of the T&I SEPP.

This document has been prepared in accordance with the *Guidelines for Division 5.1 assessments* (the Guidelines) by the Department of Planning, Housing and Infrastructure (DPHI) as well as the *Addendum Division 5.1 guidelines for schools*. The purpose of this report is to assess the proposed activity against *Planning for Bush Fire Protection* (RFS 2019), *Addendum to Planning for Bush Fire Protection* (RFS 2022) and *Addendum to Planning for Bush Fire Protection* (RFS 2025), collectively referred to as ‘PBP’.

1.1 Site Description

The current street address is 200 Fairway Drive, Wilton, 2571, NSW. The site forms part of the southern portion of Lot 1063 in Deposited Plan 1289197 that was previously subdivided by Landcom. The site is approximately 3.79 ha in size and is located within the North Wilton Precinct.

As a result of precinct wide rezonings, the surrounding locality is transitioning from a semi-rural residential area to a highly urbanised area with new low to medium density residential development with supporting services. North Wilton is approximately 85 km south-west of the Sydney CBD, 30 km north-west of Wollongong and 30 km south-west of Campbelltown-Macarthur Strategic Centre. The precinct is located on an interchange with the Hume Highway, which connects the Southern Highlands with the Sydney metropolitan region to the northeast and Canberra to the south-west.

The proposed school site does not currently have road access, however Landcom is expected to deliver the road network and surrounding public domain network in accordance with DA/2022/1279/1. Proposed Road 14 located on the eastern boundary of the site will ultimately provide future access to the site. The site contains several patches of remnant native vegetation particularly within the south-western portion of the site. An aerial photograph of the site is provided in Figure 1.



Figure 1: Aerial Photograph of the site (Source: Urbis 2025)

2. Property and Proposal

Table 1 identifies the site and outlines the type of development proposed.

Table 1: Site and development proposal summary

Street address:	200 Fairway Drive, Wilton
Postcode:	2571
Lot/DP no:	Southern portion of Lot 1063 in Deposited Plan 1289197
Local Government Area:	Wollondilly Shire Council
Fire Danger Index (FDI)	100
Current land zoning:	UD – Urban Development
Type of development proposed:	Educational establishment, which is special fire protection purpose (SFPP)

2.1 Proposed Activity

The proposed activity is for the staged construction and operation of a new high school for Wilton which will accommodate up to 1,000 students and 78 staff.

The new high school includes general and support learning spaces, specialist learning hubs, a library, administrative areas and a staff hub. Core facilities include a canteen, carparks, and sports courts.

Specifically, this proposal includes the following:

- Stage 1 includes:
 - Construction of a learning hub (Block A).
 - Sport field and sports courts.
 - Northern car park
- Stage 2 includes:
 - Construction of learning hubs (Blocks B and C) and a sports and performance hub (Block D):
 - Southern car park
- Associated site utilities and services including installation of new padmount substation and a new main switchboard.
- Main school pedestrian entrance proposed off Road 14.
- Kiss and drop zone proposed along Road 14.
- Earthworks and tree removal.

Figure 2 provides an extract of the proposed site plan.

2.2 Bush Fire Prone Land (BFPL) Status

The proposed activity is located on land currently fully mapped as bush fire prone land (BFPL) as shown in Figure 3. Further assessment has identified that the BFPL map is outdated and does not reflect current urban development and subsequent removal of bushfire prone vegetation. Additionally, proposed bushfire mitigation measures to be implemented as part of this activity further reduce the extent of surrounding bushfire prone vegetation and therefore the BFPL. This is detailed further in Section 0 and Figure 5.

2.3 Assessment Process

Being a special fire protection purpose (SFPP) development on BFPL, the proposal was assessed in accordance with PBP. This report demonstrates that the proposal, together with the recommendations within this report address the relevant specifications and requirements under PBP.

This assessment is based on the following information sources:

- Background documentation provided by School Infrastructure NSW (SI);
- Information contained within the site plan from TKD Architects (Job No. 240133 Rev A dated 17 June 2025 [Figure 2]);
- Geographic information system (GIS) analysis including online spatial resources (i.e. Google Earth, SIX Maps, Nearmap and the NSW Government Planning Portal); and
- Site inspection undertaken 31 October 2024.

Table 2 identifies the bushfire protection measures assessed and whether an acceptable or performance solution is being proposed.

Table 2: Summary of Bush Fire Protection Measures Assessed

Bushfire Protection Measure	Acceptable Solution	Performance Solution	Report Section
Asset Protection Zones	N/A	N/A	4.1
Landscaping	☐	☒	4.2
Construction	☐	☒	4.3
Access	N/A	N/A	4.4
Water supply	N/A	N/A	4.5
Electricity services	N/A	N/A	4.5
Gas services	N/A	N/A	4.5
Emergency management	N/A	N/A	4.6

2.4 Stakeholder Consultation

RFS were consulted in relation to the proposed development via a formal pre-DA meeting and issued a Request for Information (6 August 2025; Appendix E). RFS are agreeable with the bushfire hazard assessment (Section 3.4) although, based on the broader landscape bushfire risk the following bushfire protection measures were agreed upon:

1. Construction: Ember protection to the Class 9 buildings instead of Bushfire Attack Level (BAL) construction.
2. Landscaping: To consider bushfire landscaping principals instead of PBP Inner Protection Area requirements.

2.5 Significant Environmental Features

The site is situated within the Sydney Growth Centres biodiversity certified areas. In August 2017, the *Biodiversity Conservation Act 2016* (BC Act) was gazetted and repealed the *Threatened Species Conservation Act 1995* (TSC Act), however under Section 43 of the *Biodiversity Conservation (Savings and Transitional) Regulation 2017*, the repeal of the TSC Act does not affect the operation of Part 7 or 8 of Schedule 7 to that Act. The effect is that the Biodiversity Certification of the Growth Centres continues to have effect under the new legislation. Biodiversity certification removes the need to conduct impact assessment on certified land for threatened species population and communities listed under the BC Act.

2.6 Aboriginal Cultural Heritage

An assessment of any Aboriginal cultural heritage objects (within the meaning of the *National Parks and Wildlife Act 1974*) that may potentially be affected by the proposed bushfire protection measures has been undertaken as part of this planning application process and addressed in a separate report (GML 2025). The impact footprint of the bushfire protection measures (e.g. APZ) is identified within this report and therefore capable of being assessed by a suitably qualified person.



Figure 2: Site Plan (Source: TKD Architects 2025)

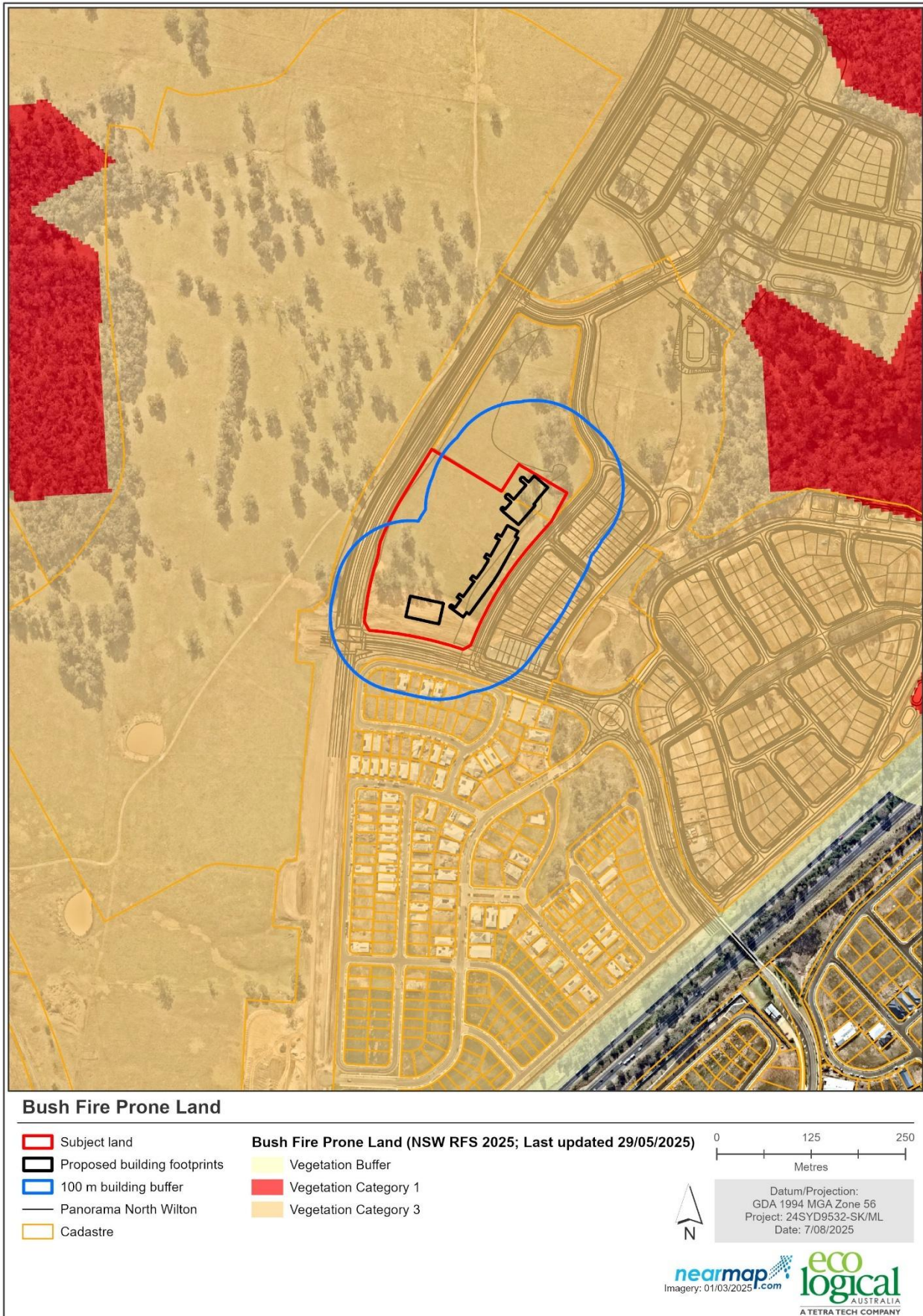


Figure 3: Bush Fire Prone Land (BFPL) and Addendum 2025 Assessment (Source: RFS 2024a)

3. Bushfire Hazard Assessment

3.1 Process

The site assessment methodology from Appendix 1 of PBP has been used in this assessment to determine the required APZ and construction requirements.

Figure 4 and Table 3 show the effective slope and predominant vegetation representing the highest bushfire threat potentially posed to the development from various directions.

3.2 Vegetation Assessment

In accordance with PBP, the predominant vegetation has been assessed for a distance of at least 140m from the site in all directions.

The predominant vegetation has been determined from vegetation mapping (DCCEEW 2020) and verified from site assessment.

3.3 Slope Assessment

In accordance with PBP, the slope that would most significantly influence fire behaviour is determined over a distance of 100 m from the boundary of the proposed activity under the classified vegetation.

The effective slope has been determined from 2 m contour data.

3.4 Summary of Assessment

As shown in Figure 4, there is no bushfire hazard within 140 m of the site.

As part of the development for the school, Landcom (the developer) will implement and manage a temporary 140 m APZ to the west (measured from the site boundary) until construction of future stages of Panorama North Wilton (see Masterplan in Appendix C) commence.

In all other directions there are managed lands within Panorama North Wilton Stage 1 (south) and Stages 2 and 3 (north and east) which are currently under construction and constitute ‘managed land’ in accordance with issued conditions of consent (DA/2022/1279/1 and DA/2022/1279/3), therefore does not constitute a bushfire hazard.

Future development in all directions will consist of residential development (east and south), new primary school (north) and public open space areas (east/north-east).

Table 3: Bushfire hazard assessment and APZ requirements

Direction from site	Summary of Assessment
All directions	Managed land in the form of land cleared for residential development (DA/2022/1279/1 and DA/2022/1279/3) within Panorama North Wilton Stage 1 (south) and Stages 2 and 3 (north and east). Temporary 140 m APZ to be implemented within future stages of Panorama North Wilton and managed by Landcom (the developer) until the hazard permanently removed (Refer APZ agreement in Appendix D).

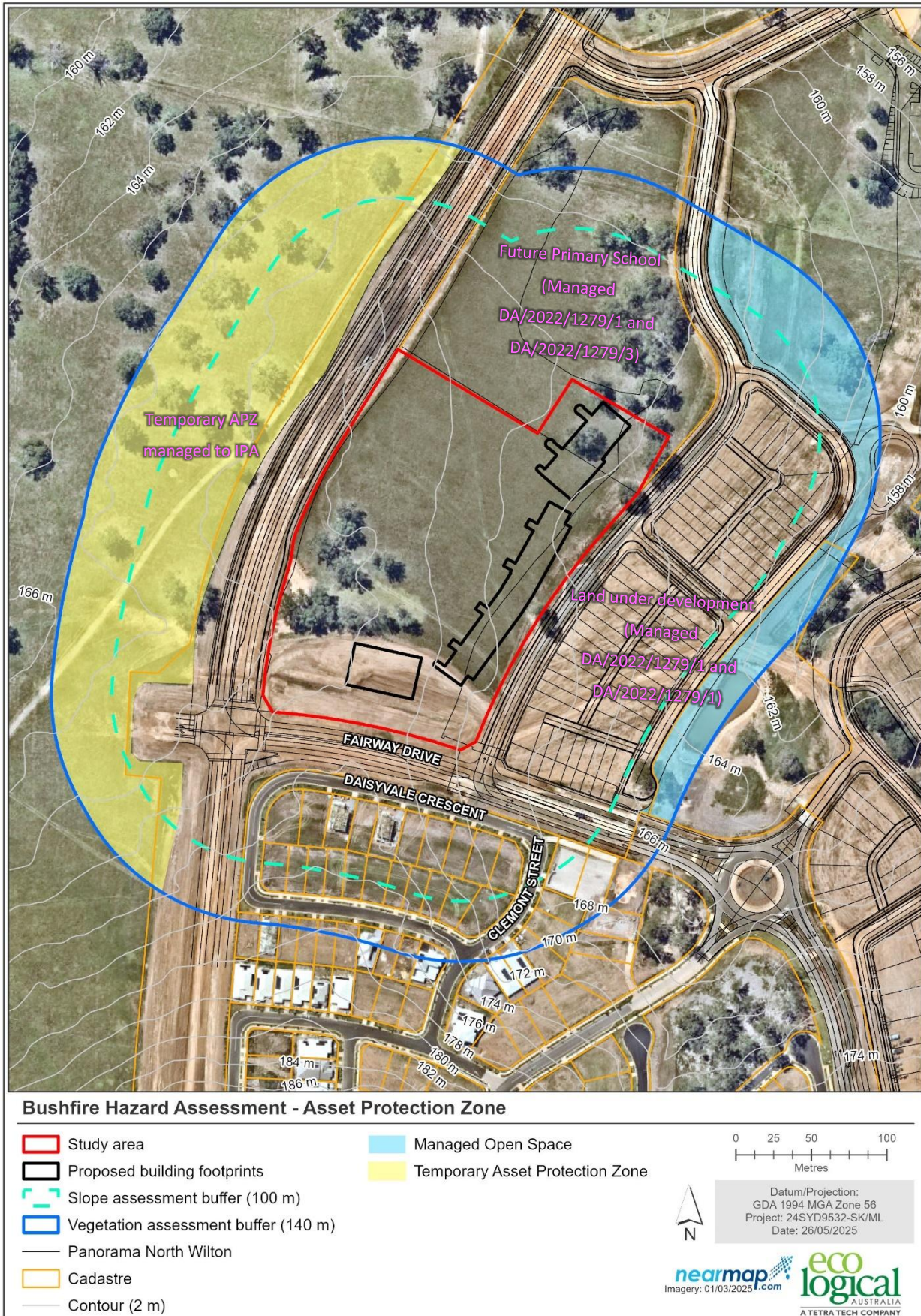


Figure 4: Bushfire hazard assessment (Source: ELA 2025)

4. Bushfire Protection Measures

In undertaking this assessment, it should be noted the site's low bushfire risk profile based on the following:

1. There will be no bushfire hazard within 140 m of the site boundary;
2. Buildings are ≥ 180 m from any grassland bushfire hazard (see Figure 5 and photographs in Appendix B);
3. Buildings are ≥ 200 m from the nearest woodland bushfire hazard (Figure 5);
4. The updated BFPL (to be undertaken under a separate application, refer Section 0) will remove the current BFPL mapping from the entire site;
5. The nearest mapped Category 1 vegetation (current) is ≥ 270 m to the north-east (Figure 3) or ≥ 200 m from the revised BFPL map (Figure 5).

Based on the above, no bushfire response or bushfire protection measures (BPM) are required, once the BFPL is updated to reflect current development and land management to the west the site will not be bushfire prone land AND there is no bushfire hazard within ≥ 140 m.

Nonetheless, as the current BFPL mapping identifies the site as bushfire prone and following RFS consultation (Section 2.4), this report provides recommendations for construction and landscaping to address RFS concerns.

4.1 Asset Protection Zones

As discussed in Section 3.4, a temporary ≥ 140 m APZ will be implemented to the west and managed by Landcom (the developer) until future stages of Panorama North Wilton (Appendix C) are constructed and the bushfire hazard removed permanently (Refer agreement in Appendix D).

Stages 2 and 3 Panorama North Wilton (north and east) are currently under construction and constitute 'managed land' in accordance with issued conditions of consent (DA/2022/1279/1 and DA/2022/1279/3).

The compliance of the APZ with Section 6.8.1 of PBP is documented in Table 4.

Table 4: APZ requirements and compliance (adapted from Table 6.8a of PBP)

Performance Criteria	Acceptable Solutions	Compliance Notes
The intent may be achieved where:		
Radiant heat levels of greater than 10kW/m^2 (calculated at 1200K) will not experienced on any part of the building	The building is provided with an APZ in accordance with Table A1.12.1 in Appendix 1 of PBP.	Not applicable No bushfire hazard within ≥ 140 m.
APZ maintenance is practical, soil stability is not compromised and the potential for crown fires is minimised.	The APZ is located on lands with a slope less than 18 degrees.	Not applicable No bushfire hazard within ≥ 140 m.
APZs are managed and maintained to prevent the spread of fire to the building.	The APZ is managed in accordance with the requirements of Appendix 4 of PBP;	Not applicable No bushfire hazard within ≥ 140 m.

Performance Criteria	Acceptable Solutions	Compliance Notes
	APZs are wholly within the boundaries of the development site; and	Not applicable No bushfire hazard within ≥ 140 m.
The APZ is provided in perpetuity.	Other structures located within the APZ need to be located further than 6 m from the refuge building.	Not applicable No refuge buildings proposed.

4.2 Landscaping

Given the separation distance from any bushfire hazard, and that the Wollondilly Shire Council tree canopy requirements (40%) conflicts with PBP Inner Protection Area (IPA) tree canopy requirements (15%), a detailed landscape plan will be developed as a performance solution and endorsed by a BPAD Level 3 Practitioner as agreed with by RFS (Section 2.4).

The compliance of the proposed landscaping with Section 6.8.1 of PBP is documented in Table 5.

Table 5: Landscaping requirements and compliance (adopted from Table 6.8a of PBP)

Performance Criteria	Acceptable Solutions	Compliance Notes
The intent may be achieved where:		
Landscaping is managed to minimise flame contact and radiant heat to buildings, and the potential for wind-driven embers to cause ignitions.	Landscaping is in accordance with Appendix 4 of PBP; and	<u>Landscaping within the site</u> To comply with Performance Criteria A detailed Landscape Plan is proposed for landscaping within the site which will consider the principles of bushfire design and the guidance provided in Section 4.2.1. The landscape plan shall be developed in consultation with a suitably qualified bushfire consultant and be endorsed by a BPAD Level 3 Practitioner, prior to Crown Certificate being issued for Stage 1 and any construction work being undertaken.
	Fencing is constructed in accordance with Section 7.6 of PBP.	<u>Landscaping within the site</u> To comply with Performance Criteria See Section 4.2.1 below for details.

4.2.1 Landscape Design Detail

The guiding principles in Table 6 will be considered in the Landscape Plan rather than strict bushfire landscaping criteria.

Table 6: Principles of bushfire design

Vegetation Strata	Guiding Principles
General	- Create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings; - Ongoing maintenance schedule to ensure leaves and vegetation debris should be removed; - A minimum 1 m wide pathway/areas, suitable for pedestrian traffic, be provided around the immediate curtilage of any building; - Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters); - Use non-combustible materials or hardwood timber for fencing, gates, hard landscaping etc.; - Avoid climbing species to walls and pergolas;

Vegetation Strata	Guiding Principles
	• Locate combustible materials such as woodchips/mulch, flammable fuel stores away from any buildings; • Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from any buildings; and • Low flammability vegetation species are used.
Trees	• Trees at maturity should not touch or overhang the building; • Discontinuous canopy to avoid wicks; • Lower limbs should be removed up to a height of 2 m above the ground; • Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies; • Preference to smooth-barked and evergreen trees.
Shrubs	• Not planted directly adjacent to vulnerable building elements i.e. glazing; • Separated from buildings by a distance of at least twice the height of the full mature shrub; and • Low flammability species (low oil content and don't retain dead material etc.)
Grass	• Turf areas maintained at <100 mm.

4.3 Construction Standards

The compliance of construction with Table 2 of Appendix B of Addendum to PBP (Appendix B) is documented in Table 7.

As demonstrated in Figure 5, buildings are ≥ 200 m from any potential wooded bushfire hazard and will not be exposed to radiant heat and flame contact from a bushfire however, based on RFS feedback regarding the broader bushfire landscape risk, they have identified the potential for ember attack.

RFS have provided in principle support for the below approach in providing an ember protection solution only in lieu of full BAL-12.5/19 construction (Section 2.4 and Appendix E).

Table 7: Construction requirements and compliance (adopted from Table 2 of PBP Addendum)

Performance Criteria	Acceptable Solutions	Compliance Notes
The intent may be achieved where:		
The proposed building can withstand bush fire attack in the form of wind, embers, radiant heat and flame contact.	A construction level of BAL-19 or greater under AS 3959 and Section 7.5 of PBP is applied.	Satisfies Performance Criteria Detailed in Section 4.3.1.

4.3.1 Construction Design Detail

The construction design of the school includes the following specifications which are considered to mitigate bushfire risk and form part of the ember protection response:

- Buildings will be constructed to the applicable National Construction Code (NCC) general fire safety provisions;
- Window glazing will be 5 mm toughened glass;
- External cladding is 8 mm thick fibre-cement cladding (Equitone); and
- Windows frames will be aluminium.

It is recommended the following additional ember protection measures be implemented to all buildings:

- Enclose all openings or cover openings with a non-corrosive aluminium, bronze or steel metal mesh with ≤ 2 mm aperture. Where applicable, this includes any sub floor areas, openable windows, vents, louvres, weepholes and eaves;
- Affix draught excluders/weather strips to the base of all side-hung external doors and roller doors;
- Roller shutter doors with ventilation slots shall be protected with non-combustible mesh with ≤ 2 mm aperture;
- If sarking incorporated to roof and/or walls, it shall be non-combustible;
- Ensure roof/wall junction is appropriately sealed to prevent ember penetration i.e. with mineral wool, sarking, sealant, capping to ensure any gap is ≤ 2 mm aperture.

4.4 Access

The activity does not include construction of any public road infrastructure and is bound by the public road network being, the sub-arterial road currently under construction by Landcom (west), existing Fairway Drive (south) and an unnamed road (east). Further to the north, beyond the future Wilton Primary school site is another unnamed road currently under construction by Landcom (Figure 4). The surrounding roads are expected to be delivered by Landcom under subdivision approval (DA/2022/1279/1) prior to operation of the school.

Although the site is currently mapped as BFPL there will be no bushfire prone vegetation within >200 m of the site. Given this and that the BFPL status of the site will be revised (see Section 5) and in agreement with RFS, no additional access requirements are recommended.

4.5 Utilities (Water, Electricity and Gas)

Although not applicable (as described in Section 4.4) and in agreement with RFS, the activity will be serviced by the following utilities:

1. Reticulated water supply: Pending works implemented by Landcom and fire hydrant systems will be provided in accordance with AS2419.1:2021 as required under NCC (or current version at time of construction).
2. Electricity: Electricity services to the site will be located underground pending works implemented by Landcom.
3. Gas: Installation of reticulated or bottled gas will need to be in accordance with relevant standards.

4.6 Emergency and Evacuation Planning

Although the site is currently mapped as BFPL there will be no bushfire prone vegetation within >200 m of the site. Given this and that the BFPL status of the site will be revised (see Section 5) and in agreement with RFS, no additional water requirements are recommended. Although not applicable, the school will need to meet DoE emergency management policy and requirements.

4.7 Addendum 2025 (RFS 2025)

Addendum 2025 (Amendment 1) amends specification S43C9 (internal tenability) of Part G5 of the National Construction Code (NCC) 2022 (ABCB 2022) as follows:

For the purposes of applying the Deemed-to-satisfy (DTS) provision at clause G5D4(a) under Part G5 of the NCC 2022 (NSW), Specification S43C9 is amended as follows:

(1) The following text is to be inserted after paragraph (d):

In respect of a building that is, or forms part of, a primary and/or secondary school, Specification S43C9 does not apply, unless:

(a) any part of the building is on land, or is within 100 metres of land, that is categorised as Vegetation Category 1 on a bush fire prone land map certified by the Commissioner of the NSW RFS under section 10.3 of the EP&A Act; and

(b) the area of land categorised as Vegetation Category 1:

- i is greater than 5 hectares in size but is not a corridor with a width of 120 metres or less at its widest point (where ‘width’ refers to the narrowest dimension of the corridor); or*
- ii is within 100 metres in any direction of another area of land categorised as Vegetation Category 1 which meets (1)(b)(i).*

As shown in Figure 3, the Category 1 vegetation to the north-east and north-west is >100 m from any of the school buildings which meets the condition specified in Amendment 1(a). Based on this, Amendment 1 of Addendum 2025 applies and the S43C9 internal tenability requirements are not applicable to the school buildings.

5. National Construction Code (NCC) 2022 Considerations

Although Addendum 2025 (RFS 2025) removes S43C9 (see Section 0) and modifies S43C14 (see Section 4.4), ELA has undertaken an assessment of the BFPL status and consideration of how the NCC 2022 Part G5 and associated Specification 43 applies.

5.1 Revised Bush Fire Prone Land Mapping

As per Section 2.2, the current BFPL map (Figure 3) does not reflect the approved / current level of urban development within the surrounding land (DA/2022/1279/1) and subsequent removal or management of bushfire prone vegetation as identified in Section 3.4. Furthermore, the vegetation management to be implemented as part of this activity (detailed in Section 4.1) and the primary school development to the north (P5-2025-74) will further reduce the extent of BFPL. An update to the BFPL map under the RFS document *Guide for Bush Fire Prone Land Mapping* (RFS 2015) is currently being pursued by DoE in consultation with Council as per Bushfire Mitigation Measure (BMM) #5 in Table 10.

The potential BFPL mapping update is presented in Figure 5 and includes the following changes:

- Removal of Vegetation Category 3 to the east and south of the subject land that has been cleared for residential development (subdivision currently under construction [DA/2022/1279/1]).
- Refinement of Vegetation Category 3 to the north-east (Lot 1064 DP 1289197), north (Lot 103 DP 1293737) and north-west (Lot 102 DP 1293737) to reflect land to be managed by Landcom (Appendix B). These lands are subject to future residential development and will be managed until such time as the temporary grassland hazard is removed.

Details of the temporary Asset Protection Zones (APZ) are outlined in Table 8 below.

Table 8: Proposed temporary vegetation management arrangements

ID No. (Figure 5)	Sector	Address	Planning Approval	Hazard Assessment/Mitigation
1	North-east	Lot 1064 DP 1289197	P5-2025-74	Land to be managed by Landcom as a temporary APZ, 100 m from site boundary (Appendix D) and secured under an 88b Instrument (P5-2025-74).
2	North	Lot 103 DP 1293737	P5-2025-74	As above.
3	North-west	Lot 102 DP 1293737	P5-2025-74	As above.
4	West	Lot 102 DP 1293737	N/A	Land to be managed by Landcom as a temporary APZ, 140 m from site boundary (Appendix B) and secured under an 88b Instrument as a Bush Fire Safety Authority condition (yet to be issued).

The methodology within the draft release of the *Guide for Bush Fire Prone Land Mapping* (RFS 2024b) was also evaluated and will not result in any changes to the above assessment.

5.2 NCC 2022 Part G5 and Associated Specification 43

NCC 2022 Volume 1, Part G5D4 (NSW) prescribes that a Class 9 building that is a SFPP must comply with Specification 43 except as amended by PBP (G5D4[a]) or as modified by the development consent with a Bush Fire Safety Authority (BFSA) issued under Section 100B of the *Rural Fires Act 1979* (RF Act) for the purposes of integrated development (G5D4[c]).

The proposed activity is SFPP and is currently located on BFPL and requires a BFSa to be issued under Section 100B of the RF Act for the purposes of integrated development. However, following revision of the BFPL (Section 5.1) the mapping will be removed from the site.

ELA recommends that the RFS BFSa acknowledge that NCC 2022 Part G5 and Specification 43 do not apply, as a site-specific assessment demonstrates low bushfire risk and a BFPL map amendment has been lodged with Council to reflect these findings.

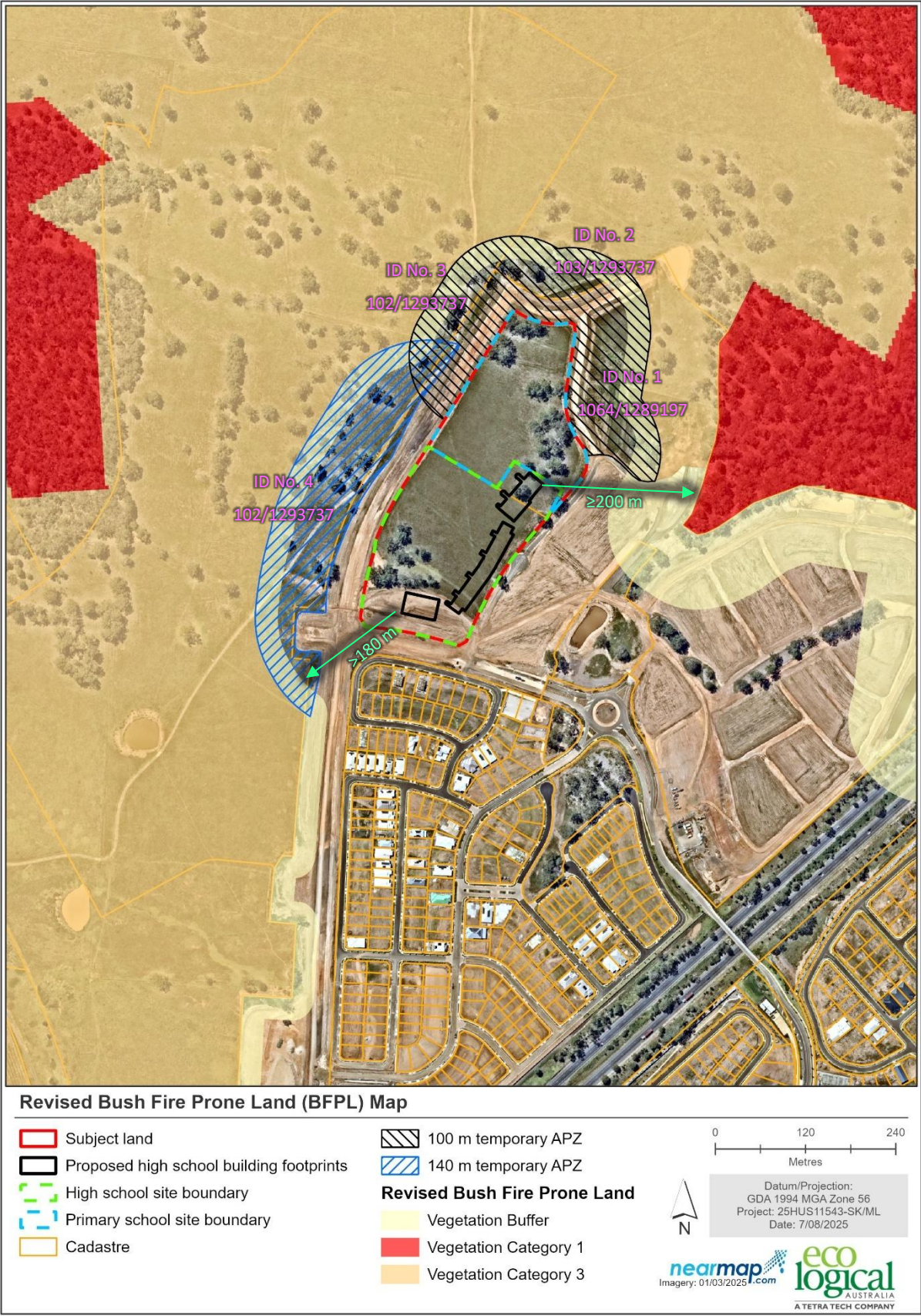


Figure 5: Updated Bush Fire Prone Land (BFPL) map (Source: ELA)

6. Conclusion

Whilst the proposed activity is located on land currently mapped as BFPL triggering a response to PBP, the mapping is outdated and does not reflect surrounding approved development and subsequent bushfire prone vegetation removal or management. Furthermore, the vegetation management to be implemented as part of this activity (detailed in Section 4.1) reduces the extent of the surrounding BFPL mapping.

The proposed activity has been assessed against the specifications and requirements within PBP, as outlined in Table 9 below.

Table 9: Development Bushfire Protection Solutions and Recommendations

Bushfire Protection Measures	Recommendations	Acceptable Solution	Performance Solution	Report Section
Asset Protection Zones	APZ dimensions are detailed in Table 3 and shown in Figure 4. Identified APZ to be maintained to the specification in Appendix A in perpetuity or until such time as the land is developed and the bushfire hazard is removed.	N/A	N/A	4.1
Landscaping	A detailed Landscape Plan is proposed for landscaping within the site which will consider the principles of bushfire design and the guidance provided in Section 4.2.1 and be endorsed by a BPAD Level 3 Practitioner.	☐	☒	4.2
Construction	Ember protection measurements detailed in 4.3.1 are implemented to all buildings.	☐	☒	4.3
Access	No new public roads proposed. No BPM are proposed or required as design features (existing/new public roads) meet PBP Table 6.8b design requirements.	N/A	N/A	4.4
Water supply	No requirements however, fire hydrant systems will be provided in accordance with AS2419.1:2021.	N/A	N/A	4.5
Electricity service	No requirements as electricity supply located underground.	N/A	N/A	4.5
Gas service	No requirements as no gas services installed.	N/A	N/A	4.5
Emergency Management	Activity to meet DoE emergency management policy and requirements.	N/A	N/A	4.6
Addendum 2025 (Amendment 1) S43C9	S43C9 (internal tenability) requirements do not apply to the school buildings.	☒	☐	0
Bush fire prone land (BFPL) mapping	Update BFPL map in accordance with the RFS document <i>Guide for Bush Fire Prone Land Mapping</i> (RFS 2015).	N/A	N/A	5.1
NCC 2022 Part G5 and Specification 43	Part G5 and associated Specification 43 does not apply subject to the revised BFPL mapping.	☒	☐	5.2

7. Evaluation of Environmental Impacts

Based on the identification of potential issues, and an assessment of the nature and extent of the impacts of the proposed activity, it is determined that:

- *The extent and nature of potential impacts are low, and will not have significant adverse effects on the locality, community and/or the environment;*
- *Potential impacts can be appropriately mitigated or managed to ensure that there is minimal effect on the locality, community and/or the environment.*

8. Mitigation Measures

Table 10 below details the proposed bushfire mitigation measures required at design, construction and operation stages.

Table 10: Proposed Bushfire Mitigation Measures

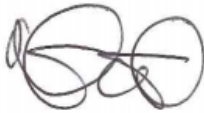
Aspect	MM ID	MM Name	Mitigation Measure	Timing	Responsibility
Bushfire	BMM1A	Temporary External APZ: Implementation	An external temporary 140 m APZ (Table 3 and shown in Figure 4) must be implemented in accordance with the specifications detailed in Appendix A of the Bushfire Protection Assessment report (ELA 2025)	Prior to completion of Construction of Stage 1	DoE to coordinate with relevant parties
Bushfire	BMM1B	Temporary External APZ: Management	An external temporary 140 m APZ (Table 3 and shown in Figure 4) must be managed and maintained in accordance with the specifications detailed in Appendix A of the Bushfire Protection Assessment report (ELA 2025).	Ongoing	DoE
Bushfire	BMM2	Temporary Internal APZ: Implementation and Management	The remainder of the site (Lot 1063 DP 1289197) must be managed and maintained as a temporary APZ until Stage 2 construction commences.	During Construction and Operation of Stage 1	DoE
Bushfire	BMM3A	Landscaping	Prior to issue of Crown Certificate for Stage 2, DoE must ensure landscaping within the site is designed to considers the principles of bushfire design and the guidance provided in Section 4.2.1 the Bushfire Protection Assessment report (ELA 2025).	Prior to issue of Stage 2 Crown Certificate	DoE
Bushfire	BMM3B	Landscaping	A landscape plan shall be developed in consultation with a suitably qualified bushfire consultant and be endorsed by a BPAD Level 3 Practitioner, prior to Crown Certificate being issued for Stage 1 and any construction work being undertaken.	Prior to issue of Stage 1 Crown Certificate	DoE
Bushfire	BMM4	Construction	Prior to operation, DoE are to ensure the following ember protection measures are implemented to all buildings: Enclose all openings or cover openings with a non-corrosive aluminium, bronze or steel metal mesh with ≤ 2 mm aperture. Where applicable, this includes any sub floor	Prior to Operation of Stage 1	DoE

Aspect	MM ID	MM Name	Mitigation Measure	Timing	Responsibility
			areas, openable windows, vents, louvres, weepholes and eaves; - Affix draught excluders/weather strips to the base of all side-hung external doors and roller doors; - Roller shutter doors with ventilation slots shall be protected with non-combustible mesh with ≤ 2 mm aperture; - If sarking incorporated to roof and/or walls, it shall be non-combustible; - Ensure roof/wall junction is appropriately sealed to prevent ember penetration i.e. with mineral wool, sarking, sealant, capping to ensure any gap is ≤ 2 mm aperture.		
Bushfire	BMM5	Bush fire prone land (BFPL) mapping	Consultation is to occur with Council, Landcom and RFS to update the BFPL map applying to the site to remove mapped bushfire risk. <u>In lieu of or until mapping is approved, the activity is to be designed to meet requirements as agreed to by NSW RFS in writing. Evidence of the agreement is to be provided to the DoE Project Lead and DoE Post Approval and Compliance Team.</u>	Prior to Operation of Stage 1	DoE to coordinate with relevant parties

9. Recommendations

In consideration of the low bushfire risk and addressing RFS concerns, it is recommended that the proposed new high school in Wilton be approved based on the findings in Table 9 and the below recommendations:

1. Implement temporary APZ (≥ 140 m) to the west, measured from site boundary and maintained to IPA specifications in accordance with Appendix 4 of PBP until development occurs and the bushfire hazard is removed;
2. Temporary APZ to be secured under a legally binding and enforceable agreement between DoE and Landcom;
3. Ember protection measures detailed in 4.3.1 are implemented to all buildings;
4. A landscape plan considering the principles of bushfire design and the guidance provided in Section 4.2.1 is developed in consultation with a suitably qualified bushfire consultant and be endorsed by a BPAD Level 3 Practitioner;
5. BFPL map is updated in accordance with the *RFS Guide for Bush Fire Prone Land Mapping* (RFS 2015); and
6. BFSa acknowledges NCC 2022 Part G5 and associated Specification 43 does not apply, as a site-specific assessment demonstrates low bushfire risk and a BFPL map amendment has been lodged with Council to reflect these findings.



Natalie South
Senior Bushfire Consultant
FPAA BPAD Accredited Practitioner No. BPAD41212-L2



Bruce Horkings
Principal Bushfire Consultant and Technical Lead
FPAA BPAD Accredited Practitioner No. BPAD29962-L3



10. References

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Appendix A - Asset Protection Zone Standards

The following management specifications apply to the identified APZ in Figure 4 which is to be maintained in perpetuity. The maintenance requirements must be undertaken on an annual basis (as a minimum) and prior to the commencement of the bushfire season.

Further details on APZ implementation and management can be found on the NSW RFS website (<https://www.rfs.nsw.gov.au/resources/publications>).

Table 11: APZ management specifications

Vegetation Strata	Inner Protection Area (IPA)
Trees	• Tree canopy cover should be less than 15% at maturity; • Trees (at maturity) should not touch or overhang the building; • Lower limbs should be removed up to a height of 2 m above ground; • Canopies should be separated by 2 to 5 m; and • Preference should be given to smooth barked and evergreen trees.
Shrubs	• Create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings should be provided; • Shrubs should not be located under trees; • Shrubs should not form more than 10% ground cover; and • Clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.
Grass	• Should be kept mown (as a guide grass should be kept to no more than 100mm in height); and • Leaves and vegetation debris should be removed.

Appendix B - Photographs

Figure 1: Heavily grazed grassland to west/woodland in background (looking across sub-arterial road under construction)



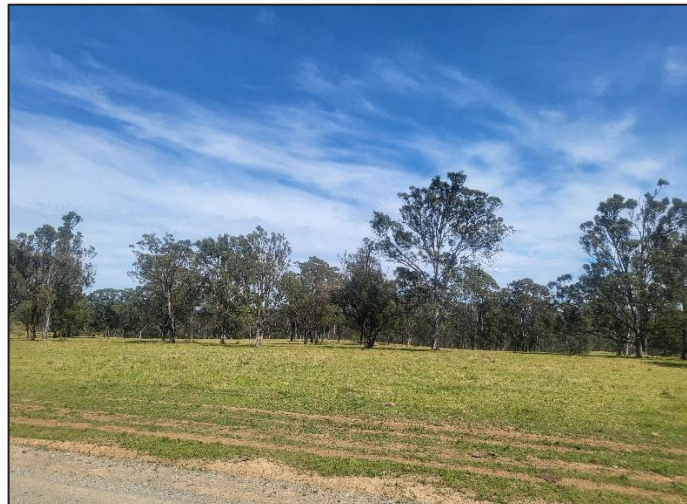
Figure 2: Heavily grazed grassland to west/woodland in background



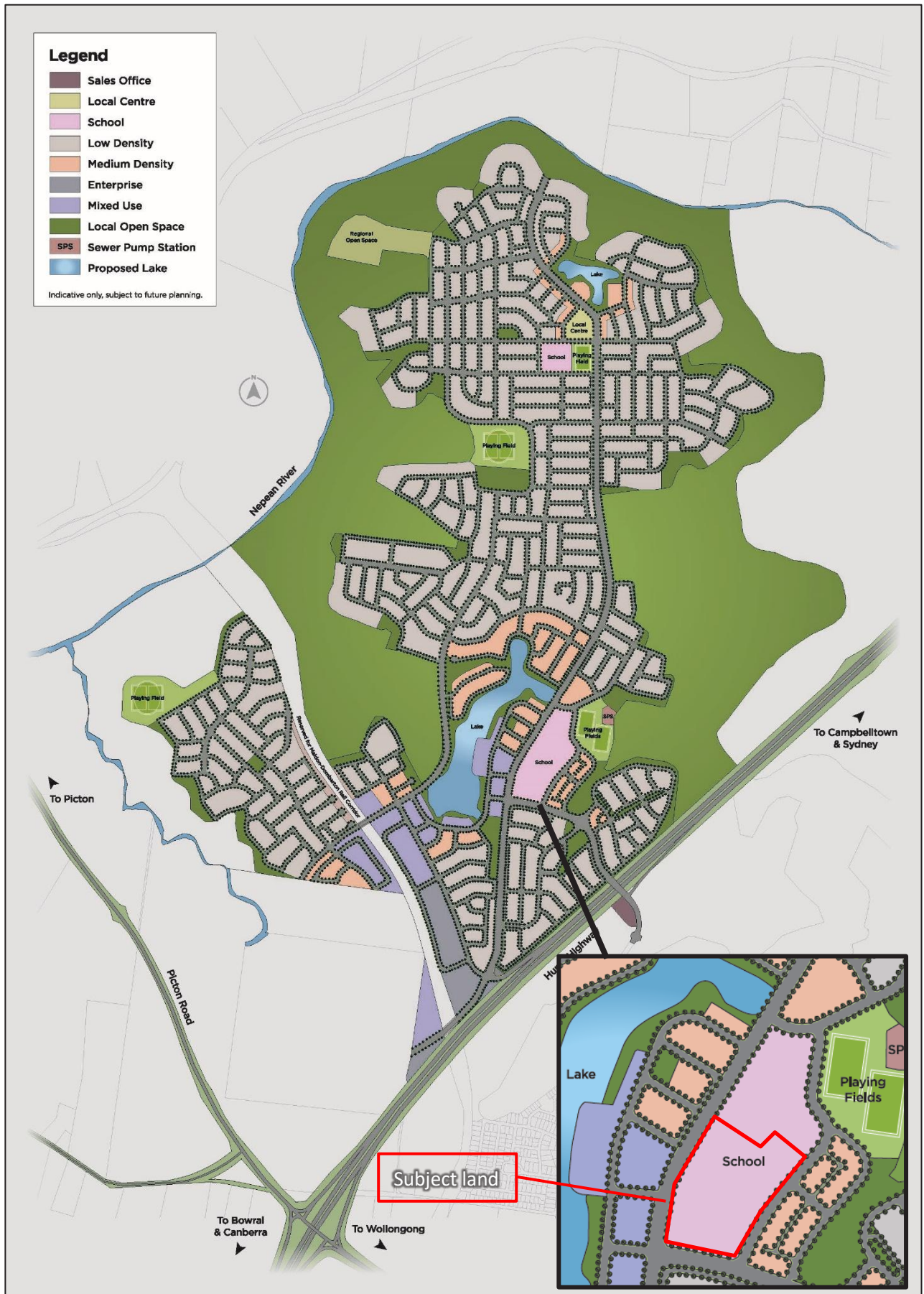
Figure 3: Heavily grazed grassland to west/woodland in background



Figure 4: Heavily grazed grassland to west/woodland in background



Appendix C – Panorama North Wilton



Appendix D - Temporary APZ Agreement



landcom.com.au

11 June 2025

Paul Jones
School Infrastructure NSW

Dear Paul

Establishment of a temporary APZ around the proposed high school at Wilton Junction

Based on information School Infrastructure NSW (SINSW) shared about their planning to date, specifically the *Bushfire - Opportunities and Constraints Report - Wilton Junction High School* produced by ecological Australia date 5 November 2024 – attached to this letter – Landcom understands that the proposed school requires the establishment of a temporary Asset Protection Zone (APZ) around the school.

Specifically, as mentioned in the executive summary, this temporary APZ will need to be of 140m to the west between the grassy woodland vegetation and the proposed school.

Landcom as the owner and developer of the land around the school is proposing to establish and maintain such an APZ on the land owned by Landcom – and excluding the land to be transferred to SINSW for the Primary School or the High School – to enable both schools planning, construction and asset protection. This proposal is limited to compliance with Planning for Bushfire Protection (PBP) requirements for landscaping and access – as far as reasonably practical and not cost prohibitive – as described in the GHD report in section 4.2 and 4.3, the other responsibilities resting with School Infrastructure. Landcom's APZ requirements will start when construction (substantial commencement) starts on the primary school. Landcom's APZ requirements will end once the bushfire hazard is permanently removed through the construction of roads, managed parklands, or built form development.

Landcom will do so in good will and at no cost to School Infrastructure, the Department of Education or the community.

When land is dedicated to Wollondilly Council, another state agency or another owner or lessee – for example surrounding roads, lots, development sites, parks or playing fields – Landcom will either transfer the responsibility of this temporary APZ to the landowner or continue to manage the APZ on behalf of the owner or lessee until these developments remove the hazard permanently or until the time these owners can and want to take on the bushfire hazard minimisation and mitigation responsibility for their land that sits in the temporary APZ area.

We are confident this arrangement will facilitate the planning and delivery of both schools.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jeff Williams", with a stylized flourish at the end.

Jeff Williams
Development Director – North Wilton

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Appendix E – RFS Request for Information



NSW Department of Education (Planning & Assessments)
GPO Box 33
Sydney NSW 2001

Your reference: P5-2025-92
Our reference: DA20250724002936-Original-1

ATTENTION: Sarah Davis

Date: Wednesday 6 August 2025

Dear Sir/Madam,

Integrated Development Application

s100B – SFPP – School

**WILTON HIGH SCHOOL - Notification of Activity – under Part 5 of the EPA Act - 200 FAIRWAY DRIVE WILTON
NSW 2571, 11//DP1311811, 10//DP1311811**

I refer to your correspondence dated 24/07/2025 seeking general terms of approval for the above Integrated Development Application.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the information provided and advises the following:

Construction

Please provide further information regarding construction level. Nil is proposed. The acceptable solution under the PBP 2022 addendum, aligning with the NCC, is BAL-19 construction.

Due to the proximity of unmanaged forested vegetation and potential ember attack to the proposal, RFS is seeking further assessment and recommendations to align with discussion had between stakeholders, bush fire consultants and the RFS that took place on 6/08/2025.

Landscaping

A landscape management plan/commentary is to be provided for any deviations/performance solutions regarding compliance with Appendix 4 of PBP 2019.

If additional information is not received within 100 days the application will be refused on the basis of Requested Information not provided. A formal request for re-assessment would be required after this time.

For any queries regarding this correspondence, please contact Jamie Winter on 1300 NSW RFS.

Yours sincerely,

Martha Dotter
Manager Planning & Environment Services
Built & Natural Environment

1

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