



NSW RURAL FIRE SERVICE



The General Manager
The Hills Shire Council
PO Box 7064
NORWEST NSW 2153

Your reference: 1/2018/PLP
Our reference: R18/682
14 August 2018

Attention: Rebecca Templeman

Dear Sir/Madam,

PLANNING PROPOSAL - 55 COONARA AVENUE, WEST PENNANT HILLS

Reference is made to Council's correspondence dated 25 July 2018 seeking comment in relation to the above planning proposal, which seeks to rezone the subject site to facilitate residential development comprising of 400 apartments and 200 medium density dwellings.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the proposal with regard to Section 4.4 of the directions issued in accordance with Section 117(2) of the *Environmental Planning and Assessment Act 1979*.

The objectives of the direction are:

- (a) *to protect life, property and the environment from bush fire hazards, by discouraging the establishment of incompatible land uses in bush fire prone areas, and*
- (b) *to encourage sound management of bush fire prone areas.*

The direction provides that a planning proposal must:

- (a) *have regard to Planning for Bushfire Protection 2006,*
- (b) *introduce controls that avoid placing inappropriate developments in hazardous areas, and*
- (c) *ensure that bushfire hazard reduction is not prohibited within the APZ.*

Based upon an assessment of the information provided, NSW RFS raises no objections to the proposal subject to a requirement that the future subdivision and development of the land complies with *Planning for Bush Fire Protection 2006* (or equivalent). This includes, but is not limited to:

- Asset Protection Zones (APZs) to be provided within the proposed lots in accordance with Table A2.4;
- Access to be provided in accordance with the design specifications set out in section 4.1.3; and,
- Services to be provided in accordance with section 4.1.3.

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Due to the complexities of multi-storey residential buildings in bush fire prone areas, a fully engineered performance based solution should be prepared for any such submission, which is to include a Bush Fire Design Brief. Heads of consideration for performance-based solutions should include the following:

- Location – Multi-storey buildings should not be located on ridges or slopes with significant fire runs.
- Existing Infrastructure – When multi-storey developments are proposed, their impact during potential bush fire emergencies needs to be considered, particularly in terms of evacuating occupants along the road network and the availability of water supplies available for fire fighting
- External facades – These may result in increased exposure to radiant heat and also convection columns. Specialised modelling may be needed and APZs may need to be increased over and above what is specified to account for this.
- Egress – The risk associated with the occupant egress is higher in multi-storey buildings than it is for lower-rise structures and therefore the potential for entrapment during a bushfire emergency should be addressed.

These requirements are consistent with section 8.2.2 *Multi-storey residential development* within the draft *Planning for Bush Fire Protection 2018* guidelines.

If you have any queries regarding this advice, please contact Adam Small, Development Assessment and Planning Officer, on 1300 NSW RFS.

Yours sincerely,



Kalpana Varghese
A/Team Leader, Development Assessment and Planning
Planning and Environment Services (East)