



NSW RURAL FIRE SERVICE



The General Manager
Wollondilly Shire Council
PO BOX 21
PICTON NSW 2571

Our Ref L11/0003
Your Ref 7325 mr:mr

12 July 2017

WOLLONDILLY SHIRE COUNCIL	
TRIM NO.	7325
PROP. No.	
24 JUL 2017	
AUTH. No.	
ASSIGNED TO: M. Ruddiman	

Attention: Mark Ruddiman

Dear Mark

**PLANNING PROPOSAL TO REZONE LAND AT LOT 22 DP 619150 (No. 45) NOONGAH STREET
AND LOT 95 DP 13116 (NO. 25) GWYNNE HUGHES STREET, BARGO**

I refer to the above Gateway Determination issued under s56(2) of the Environmental Planning and Assessment Act (1979) which required Council to consult with the NSW Rural Fire Service (RFS) in relation to the above planning proposal.

The NSW Rural Fire Service (RFS) notes that the subject site is identified as bush fire prone on the Wollondilly Bush Fire Prone Land Map. As Council would be aware, planning proposals near bush fire prone land are required to comply with Section 117 (2) Direction 4.4 'Planning for Bushfire Protection' whilst development applications on bush fire prone lands will be required to comply with either Section 79BA of the Environmental Planning and Assessment Act 1979 or Section 100B of the Rural Fires Act 1997 depending upon the nature of the proposed development.

The planning proposal seeks to rezone the site from part RU4 Rural Landscape and part RU4 Primary Production Small lots to part R5 Large Lot Residential and part E3 Environmental Management and apply a minimum lots size (MLS) of 4000sqm to the whole of the site. The RFS notes that no Concept Plan or Master Plan has been provided as part of the planning proposal, which can pose difficulties in providing specific comments at this stage of the proposal. The RFS recognises that the planning proposal was supported by a Bushfire Hazard Risk Assessment prepared by Sydney Bushfire Consultants dated 23 March 2017 which addresses Section 117 4.4 Direction and Planning for Bush Fire Protection (PBP) 2006.

The RFS does not object to the planning proposal subject to careful consideration of the following comments and the impact these comments will have on the ability of the site to be developed in

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accordance with the proposed zonings, minimum lot size and in recognition of the site constraints. Specifically, the RFS advises the following issues should be carefully considered prior to progression of the planning proposal:

ACCESS

1. Minimising the interface to the bush fire hazard is a key planning principle of PBP 2006. This may be achieved by providing perimeter roads to subdivisions, minimising the perimeter of the land which may be developed, to the interface, locating a development away from areas of vegetation that cannot be modified as a result of various constraints.
2. The site is subject to a significant level of bush fire risk, including large stands of adjacent unmanaged hazardous vegetation and the planning proposal seeks a substantial increase in potential lot yield of the site. As such provision of a perimeter road that complies with PBP 2006 (minimum 8 meters in width) will be a key requirement of future development of this site.
3. Access via the extension of Gwynne Hughes Road from the north of the site is considered to be at significant risk from bush fire impacts (i.e. flame contact, smoke, heat and fallen trees) which may result in this access route being unsuitable for residents evacuating and emergency services responding in the event of a bush fire. The revegetation of the Core Riparian Zone may also increase the likelihood of access being blocked during a bush fire event. To ensure unimpeded access/egress for future residents and fire fighters responding in a bush fire emergency, the planning proposal should contain provisions that will ensure future residential subdivision will provide a "through" road scenario from Gwynne Hughes St in the north through to Noongah St in the east. Any revegetation of the CRZ should include provisions to minimise the risk of access being blocked by falling trees in a bush fire emergency.

ASSET PROTECTION ZONES (APZs)

4. The Bushfire Hazard Risk Assessment proposes APZs as shown in Map 2 titled 'Planning Study Area/Subject Lot/Slopes/Minimum APZ extent' as being required for future residential subdivision of the site. Map 2 includes provision of APZs for land adjacent to the existing watercourses within the site, referenced as core riparian zones (CRZ) as this land is identified as being retained/revegetated. The RFS supports the provision of APZs within the site for the CRZs to ensure future residential development is afforded suitable separation distances from this vegetation.
5. It is noted that the Bushfire Hazard Risk Assessment does not provide any APZs for the existing vegetation within the northern portion of the site. It is presumed that this vegetation is to be removed as part of future development. If the vegetation in the northern portion of the site is to be retained or will only be removed at later stages of the development, the RFS advises that APZs will need to be created for this vegetation, in addition to those shown in Map 2 referenced above.
6. The Bushfire Hazard Risk Assessment proposes that the adjoining road reserve to the west may be utilised as an APZ "where managed" (shown on Map 2). Given the proximity of the tree canopies in the road reserve to the adjoining large tract of vegetation to the west, it is not considered appropriate to rely upon the adjoining road reserve to the west as part of the sites APZs unless the this road is to be formally constructed as part of any future subdivision and/or the land owner of the road reserve provides consent to create/maintain this land as an APZ in perpetuity at subdivision stage.
7. Whilst the APZs identified in Map 2 of the Bushfire Hazard Assessment comply with the requirements in Table A2.4 of PBP 2006, the RFS advises that currently these APZs would require future dwellings subject to the minimum APZs shown, to be constructed to Bushfire Attack Level (BAL) 40 under AS3959-2009. As such the RFS recommends that APZs should be calculated to afford future residents the ability to construct to a BAL 29 or less under AS3959-2009 (this would result in increased APZs).

SERVICES

8. PBP 2006 includes requirements for provision of water, electricity and gas. These shall be required to be complied with at future subdivision stage.

Note

The RFS advises Council to include the Wollondilly Bush Fire Management Committee (BFMC) in the process to ensure that any relevant amendments resulting may be adopted/addressed into the Bush Fire Risk Management Plan (BFRMP).

For any enquiries regarding this correspondence or to discuss the matters raised in this letter further please contact Martha Dotter on (02) 4472 0600.

Yours faithfully,



Amanda Moylan

Team Leader Development Assessment and Planning