

Memo

Bushland & Biodiversity

To: Paula Moretti, Principal Planner, Strategic & Place Planning

From: Matt Horwood, Coordinator, Bush Fire Management

Date: 3 August 2022

Subject: Planning Proposal Referral (PEX2022/001)
10-12 Boondah Rd, Warriewood

Record Number: 2022/473799

The purpose of this memo is to provide comments in relation to bush fire planning requirements for land at 10-12 Boondah Rd Warriewood.

In preparing these comments I have referred to the information submitted to Council, in particular the following documents; Bush Fire Strategic Study – Travers Bushfire & Ecology, 8 June 2022.

Key issues/concerns

A Strategic Bush Fire Study provides the opportunity to assess whether new development is appropriate in the bush fire hazard context. It also provide the ability to assess the strategic implications of future development for bush fire mitigation and management.

As per Planning for Bush Fire Protection 2019 (PBP) the level of information required for a Strategic Bush Fire Study will be dependent upon the nature of any planning instrument changes, scale of the proposal, the bush fire risk and its potential impact upon the wider infrastructure network.

Whilst this study does reference the minimum requirements in accordance with Table 4.2.1 of PBP, a number of these assessments are deficient, including:

- There is minimal consideration of the likelihood of a bush fire impacting the site and its potential severity on a landscape scale.
- The study relies on site specific protection measures rather than assessing the appropriateness of the proposal in the context of the surrounding landscape.
- The suitability of the proposal on the landscape should have stronger logical connections to informing the siting and layout of the proposed development.
- There is no assessment on the capacity of the road network either internally or externally to sufficiently handle evacuating residents and responding emergency services to/from the proposal; nor identification of evacuation routes or assessment of the potential for the development to become isolated during a fire event.

- There is no assessment of the development impact on the provision or capacity of emergency services, other than minor references to the proximity of surrounding fire stations.
- There is no assessment of the provision of infrastructure services to the proposal as the study suggests that this should be the subject of a separate study.
- There is limited assessment of the impact of the proposal on neighbouring lands, and no consideration for managed lands to the south of the proposal to remain such in perpetuity.
- Site specific APZs are not contained within the development relying on adjoining road verges. Should any land with the proposal be vested to Council, Council may be burdened with the ongoing APZ management of these and/or adjoining road verges.
- The study indicates that perimeter roads within the proposal rely on a performance solution. Performance solutions should be accompanied with the appropriate Bush Fire Design Brief and/or Bush Fire Management Plan which has not been supplied.

Are the concerns likely to amend the planning proposal in its current form?

A more thorough Strategic Bush Fire Study will determine if the proposal is appropriate in the landscape and better guide any site specific bush fire protection requirements.

Any statutory considerations

The proposal requires referral to the NSW Rural Fire Service in accordance with the relevant legislation and PBP to obtain a Bush Fire Safety Authority. Additional requirements may be imposed by the NSW Rural Fire Service to address bush fire risk to the proposal.

Any actions that Council should initiate with assessment of the proposal

It is recommended that Council requires a more thorough Strategic Bush Fire Study with relevant supporting plans, and makes referral to the NSW Rural Fire Service in accordance with relevant statutory requirements.

Yours faithfully



Matt Horwood

Coordinator, Bush Fire Management