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Via email: [Mathew.Kuhn@frasersproperty.com.au](mailto:Mathew.Kuhn@frasersproperty.com.au)

**Ref: 15SUT\_3123**

11 November 2016

Dear Mathew,

**RE: Response to NSW Rural Fire Service submission – Section 75W modification for Edmondson Park South Concept Plan (MP 10\_0188 MOD 4)**

Eco Logical Australia (ELA) was engaged to review the NSW Rural Fire Service (RFS) submission on the Section 75W modification to the Edmondson Park South Concept Plan (MP 10\_0188 MOD 4). ELA prepared a Bushfire Protection Assessment (Ref 15SUT\_3123 dated March 2016) to support the modification. The BPA covered the development of the Edmondson Park Town Centre and accompanied the Modification to the Concept Plan (Mod 2).

As part of the modification process the BPA was referred to the RFS with the following matters raised in their response dated 6 October 2016 (Reference D16/3077):

*The modification however appears to include a Bushfire Asset Protection Zones (APZ) Plan which details smaller APZs than those identified in the Bushfire Planning Assessment approved as part of the original concept plan (McKinlay Morgan & Associates Pty Ltd, 91275/2, August 2010). The Bushfire Protection Assessment submitted in support of the modification (EcoLogical, 15SUT\_3123, 4 March 2016) does not acknowledge the original Bushfire Planning Assessment and does not set out why different bushfire protection measures are now proposed. Furthermore, the APZs shown in Bushfire Asset Protection Zones Plan extend beyond the area covered by the assessment included with the modification.*

*On this basis, while the New South Wales Rural Fire Service has no objection to the general nature of the modifications proposed to the concept plan, it is recommended that the Bushfire Asset Protection Zones (APZ) Plan included in the modification request should not be approved until the above matters are addressed.*

The McKinlay report referred to in the RFS submission identifies the Asset Protection Zones (APZ) required by Table A2.4 *Planning for Bush Fire Protection 2006* (PBP) but proposed an increased APZ based on achieving BAL-19 construction and therefore exceeding the minimum PBP requirements (Table A2.4). As identified in Table 1 of the BPA prepared by ELA, proposed APZ for the modification have been determined in accordance with Table A2.4 of PBP. This complies with the acceptable solutions of PBP and the increased APZ identified in the McKinlay, whilst beneficial in reducing construction costs for future dwellings, are not required to support the subdivision.

One area of difference between the McKinlay report and the BPA prepared by ELA is the classification of vegetation in the eastern portion of the subject land within a proposed public reserve. Whilst McKinlay assesses this vegetation as woodland, the BPA acknowledges the fragmentation of this remnant vegetation resulting from the recent works on Campbelltown Road and the development of the Railway Line which provides separation from other bushfire hazards. Based on this our BPA categorises the vegetation as a 'low hazard' and applies the APZ accordingly.

In regards to the APZ extending beyond the area covered by the assessment, as outlined within **Section 2** and **Table 1** of the BPA, the required APZ to the east and west are provided by roads that are to be constructed as part of the subdivision. APZ to the north and south are provided by existing managed land associated with the recently constructed South-West Railway Line to the north and Campbelltown Road which is a 2 way bitumen sealed public road with well-maintained road reserve to the south. As identified in Section A2.3 of PBP these uses are accepted as non-vegetated areas and can be included within an APZ.

Based on the above, the RFS concerns have been adequately addressed by the BPA and no further changes are required.

If you have questions about any aspect of this letter, please contact me on (02) 8536 8600.

Yours sincerely,



Danielle Meggos  
**Bushfire Consultant**  
**FPAA BPAD Certified Practitioner No. BPD-L2-37742**

