

Date: 15<sup>th</sup> December 2017  
Our Ref: 13/054

Department of Planning & Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Ms Emma Butcher

**Re: MP06\_0258 – Casuarina Town Centre - Modification 10**

Further to the request from the Department of Planning & Environment, we have completed a review of the submission lodged by the NSW Rural Fire Service to Mod 10 dated 30 November 2017.

Following discussion with the NSW Rural Fire Service, it was identified the key issue related to the vegetation within the coastal foreshore reserve. In this respect, we have identified the land area directly east of the proposed Lots 85-91 will in fact be landscaped in a manner to permit the area to be utilised for passive recreational space and managed by Tweed Shire Council.

In this respect, we note the assessment report for Mod 10 as contained within the Tweed Shire Council Business Paper for the 13 December 2017 Ordinary Meeting contained the following reference to the use of the land.

Tweed Shire Council commentary for the subject land from the 13 December business paper is provided below.

*From an officer perspective, it is considered that being able to utilise area previously approved for stormwater basins and conveyance (both on the public reserve and to the norther buffer) as useable public open space is a good outcome for the community and this development as a whole. (page 115)*

In this respect, Council has acknowledged the land will act for stormwater infiltration purposes, however importantly, be available for public open space. To this end, the land area will not be heavily vegetated and will be landscaped to provide access to this area and associated CPTED principles.

Based on this area being managed landscaped public open space, the area itself functions as the asset protection zone for Lots 85-91. Furthermore, the function of this land area also negates the need for a perimeter road under the 'Planning for Bush Fire Protection 2006'.

**Plate 2** illustrates the concept planning for the public open space area which will act as an Asset Protection Zone. A detailed plan will be lodged with Tweed Shire Council as the PCA prior to the release of the Construction Certificate for the civil works.



**Plate 2** – Landscaped Concept Plan illustrating the public open space area highlighted in red

The highlighted land area within Plate 2 also forms part of the broader land area the subject of the Draft Plan of Management (POM) for Lot 13 DP 1014470. The POM contains the following key provisions which will also ensure the continued management of the land area.

### *Section 3.1 Current Management Considerations*

*Council will carry out regular inspections of natural areas to address risk management and maintenance concerns regarding the condition of any bushland, tracks, habitat or significant features, safety of built structures and access arrangements.*

*Maintenance: Maintenance is an essential aspect of the management of Lot 13. In particular, the public enjoyment and function of Lot 13 are more likely to be impacted by external threats such as weed infestation, damage from storms and human activity. Council obligation with standards developed for the maintenance of all natural areas to ensure that the condition of the vegetation in these areas is maintained or enhanced.*

### *Objective 2*

*Provide a buffer between the natural coastal dunal vegetation in the contiguous Lot 500, and the commercial and residential development of the land adjacent to Lot 13.*

Section 6 of the POM also details management strategies proposed to achieve the stated management objectives for Lot 13 DP1014470. Importantly, the POM nominates the use of the reserve consistent with established management objectives, category and classification of land. Specifically, the park infrastructure and landscape planting will be consistent with the reserve use for public open space versus foreshore regeneration which is located east of Lot 13.

Whilst no specific reference is made to management of an asset protection zone east of Lots 85-91 in the POM, it is inherently recognised the management of the land for its intended use as an open space park will ensure the land is maintained.

Furthermore, we raise no objection to the inclusion of a condition within the Project Approval which nominates the landscaping of this area to recognise the landscape principles contained within Appendix 5 of Planning for Bush Fire Protection 2006 guidelines are addressed.

We trust that the above information will assist the Department and the NSW Rural Fire Service in finalising the assessment of the proposed modification to the Casuarina Town Centre.

Should you have any questions, please do not hesitate contacting Mr Damian Chapelle of this office.

Yours sincerely,

**NEWTON DENNY CHAPELLE**

A handwritten signature in black ink that reads "Damian Chapelle". The signature is written in a cursive, flowing style.

**DAMIAN CHAPELLE**

Town Planner. BTP CPP.