

Submission Uploaded

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NSW Department Planning & Environment

I am writing this, because the level of resources that both the Fire and Ambulance services have are insufficient for the already approved development let alone an additional increase in dwellings, especially as the proponents have raised the levels for many buildings. Height levels increase the response time for emergency services, for which every minute can be vital. With an increase in dwellings, the resident and transient population increases. The road network is narrow and parked vehicles will slow down response time. This will make congestion a factor in the management of an incident. In the response section relating to general infrastructure those that relate to the concern of inadequate resourcing of emergency services, the answers provided are outcome driven and not factual. They show little to no knowledge and understanding of emergency services resources, and factors that influence their response times.

I am in my twenty eighth year of service with Fire Rescue New South Wales (FRNSW). I am one of four Duty Commanders who work in the Illawarra. When I am on duty, I am responsible for the personnel and operations from Helensburgh to Kiama. Therefore, I have considerable knowledge of our organisations resources and capabilities. I am also aware of factors that influence response times and the impact that congestion has on incident management. I work closely with members of the Ambulance Service NSW (ASNSW). I am aware of their resource issues and some of the factors that are currently contributing to the ASNSW not being able to meet their service delivery guarantees.

Under General Infrastructure, the third issue relates to emergency services in the area, *ETHOS URBAN cites Macroplan's benchmark assessment*. MacroPlan demonstrates how little they understand the fire services of NSW, response timeframes and operational requirements.

Following is my response to this benchmark assessment of this criteria.

MacroPlanDimasi

I would like to draw your attention to the Shell Cove Boat Harbour, Social Infrastructure Assessment 2018, prepared by MacroPlanDimasi. This is a revised response following public submissions. I contacted MacroPlan last year and spoke to an employee, informed him who I was, who I worked for and that the figures relating to increases for emergency services and schools were not correct. I also pointed out that the word **adequate** was in bold for ASNSW resources, when the sentence says **there is likely to be adequate** resources. even though I explained why the information was incorrect, nothing has changed in MacroPlan's

benchmark assessment. If you look at page 34/35 there in recommendations you will notice the following;

- From 2008 to now there has been a 67% increase in numbers of NSW Fire Stations,
- From 2008 to now there has been a 100% increase in numbers of NSW Ambulance Stations,
- From 2008 to now there has been a 200% increase in numbers of NSW Police Stations.

Whilst there have been some new stations built in the Illawarra, these are NOT additional stations. FRNSW opened a new Fire Station at Albion Park in 2014, this replaced the station at Albion Park Rail which was closed at the same time. The Shellharbour fire station opened in 2004, whilst at the same time the Warilla fire station was closed. Similarly, the new Police Station at Oak Flats resulted in the closure of Warilla Police Station. Whilst there is an Ambulance Station at Warilla, it is used solely as a communications facility. The Ambulances and personnel have relocated to Oak Flats and operate out of the ambulance maintenance building. The above-mentioned figures are simply incorrect.

Also on page 35, NSW Ambulance Service Current and Future Supply, if you look at the Recommendation, there is one word in bold in the second paragraph **adequate**. This is **deceptive** because if you put the first six words in bold it would read; **There is likely to be an adequate supply of ambulance stations in the catchment radius**. There is a huge difference between an **adequate supply and there is likely to be an adequate supply** of ambulance stations in the catchment radius. One ASNSW station to service the area is quite clearly inadequate. To say anything else is not being truly objective and surely questions the validity of MacroPlan's benchmark assessment.

On page 35 this benchmark assessment refers to NSW Fire Stations. Who are they? There is no such organisation. New South Wales currently has a duopoly of fire services, FRNSW and The Rural Fire Service (RFS). The state is split into fire service areas similarly to the Police Service who have Local Area Commands.

Currently the Shell Cove Boat Harbour Precinct is in a RFS area. The RFS area of expertise is predominately that of a bush and scrub firefighting organisation. They have no experience in Low Rise and High-Rise firefighting and how to use booster and sprinkler systems. The closest RFS station is Dunmore and they are most likely to not be trained in the use of wearing breathing apparatus. This in a structure fire is an essential requirement, especially a low or high-rise fire. FRNSW appliances have suction outlets of 150cm and 125cm. RFS appliances are 100 cm. This is important as sprinkler booster systems have a suction inlet. The majority of RFS appliances are not manufactured to be used for boosting sprinkler installations, therefore if a 100cm suction inlet is installed (due to the precinct being in RFS area) this function will be rendered unusable. ***I cannot find this information in Macroplan's benchmark assessment.***

On page 13 of the Response to Public Submissions the issue is identified as 'Nearest fire service is 30 minutes away. Aerial appliances are mainly used for high rise firefighting.' The following is an extract from my submission, which never claims that the nearest fire service is 30minutes away.

*Resources required for high rise fire- fighting are located over **thirty minutes away**. Aerial appliances are mainly used for high rise firefighting. They are also an asset for rescuing people from high rise buildings. Given there are residential buildings of four, six and eleven story's an aerial appliance will be a critical component in firefighting operations and planning.*

The aerial appliance for the Illawarra is in Wollongong so it will take roughly thirty minutes to arrive on scene.

One point of clarification that I must make is that, FRNSW determines high rise buildings are those that have an effective height greater than 25m. Those buildings under 25m are referred to as low rise or multi storey. Given this an aerial appliance is an important resource for either a low or high-rise building.

Quite clearly, I do not claim that the nearest fire service is 30minutes away. This is a distortion of my submission which brings into question the truthfulness of Ethos Urban's responses as well as its credibility.

Their response to the above-mentioned issue is as follows.

Shellharbour Fire Station is under 5 minutes away by car. The fire station has both permanent firefighters and retained firefighters (i.e. not rostered on duty at the station but notified by pager or mobile phone call) employed to respond to emergency incidents in the Shellharbour region, including the nearby Shell Cove.

Furthermore, Frasers has indicated that all new apartment and hotel buildings will have sprinkler systems in place.

Once again, this response shows a clear lack of understanding of emergency response times and operational guidelines.

In the first line it states Shellharbour Fire Station is **under 5 minutes away by car**. This may be correct; however, it is totally irrelevant as fire fighters respond in appliances and are much slower.

If you are calculating the amount of time for any of the emergency services to respond one must factor in the following,

1. The amount of time that passes before someone realises that a call needs to be made to the emergency services,
2. Upon making a 000 call, the operator will ask you what service you would like, you are then transferred to that organisations call centre,

3. The operator then asks questions and inputs information into their despatch system. The time taken varies here depending on calmness of caller, age, familiarity of location, information provided and required, and the operators experience and ability.
4. The operator then alerts the necessary resources.
5. In the case of FRNSW, on receipt of call, if they are a permanently manned station they then don their protective clothing and get into their appliance. The time taken is somewhere between one and a half and three minutes for this. It is dependent on what the crew is doing when they are alerted of an incident.
6. So far roughly three minutes or more has already lapsed and the crew is just beginning to leave their station. Sometimes it takes longer. However, this assumes that the crew is at their station. Firefighters are regularly away from their station conducting fire safety education, conducting familiarisation exercises at premises, attending public events such as fetes, relay for life fundraiser, they are also undertaking training.
7. The Shell Cove Boat Harbour precinct, has narrow streets that will most likely slow down the appliances. A car may very well take 5 minutes, but a firefighting appliance will take longer.
8. If the call is to a high rise and some low-rise buildings, once a station has arrived at the incident location they need to proceed to the floor below the fire. The more floors the longer this takes.
9. A normal fire station crew consists of four personnel. One is responsible for the appliance. The Station Officer is the incident controller or in charge of FRNSW operations if in RFS area. Then there are two fire-fighters.
10. Fire fighter safety is paramount always. Given this firefighters should not enter premises that are involved in or suspected of having a fire in them until they have backup.
11. This means that a second station must be in attendance before offensive operations take place.
12. The next closest permanent stations are Albion Park and Warrawong. Kiama is retained.
13. Once you factor this all in a considerable amount of time has taken place before entry is gained and offense firefighting is underway.

In the response Ethos Urban mentions 'retained' at Shellharbour. The appliance that the retained at Shellharbour utilise is a tanker. This appliance is primarily used for bush and scrub firefighting. The pump on this appliance does not have sufficient capacity to be an asset in structure firefighting.

Ethos Urban also states that they are used in the Shellharbour region to respond to emergency incidents. This is not completely factual. As it is a tanker and has an off-road capability it is responded to incidents outside of Shellharbour. It quite often used at

locations in the Wollongong region (Fred Finch park Berkeley and Coomaditchie reserve Pt Kembla) where it can be tied up for several hours. This appliance is known as a Take Off Line vehicle, so if there is not enough crew to staff the appliance it is taken off line. This happens from time to time, and as such is not totally reliable. This appliance can also be sent far away if requested. As you are probably aware FRNSW sends vehicles and personal to assist the RFS. The most recent example being that of Tathra.

FRNSW mandatory response to structures fires is two stations and even though Shellharbour Fire station is nearby, the additional fire-fighting resources that will be required are not as close.

The second response from Ethos Urban states that Frasers has indicated that all new apartment and hotel buildings will have sprinkler systems in place.

As no plans have been formally submitted there is no way of knowing whether the buildings will be all sprinklered or not. The Building Code of Australia (BCA) section E1.5 (from memory) outlines when sprinkler systems are mandatory. It states that buildings with an effective height of greater than 25m must be sprinklered. This means buildings of eight story's and less do not have to be sprinklered. If you checked you would find that a lot of buildings have an effective height of 24.50 m to 24.90 m. This allows them to avoid having to install a sprinkler installation as this is an added cost.

Given that Frasers Property knew that they were making changes to the boat harbour precinct and did not inform potential and eventual purchases like myself, combined with the above mentioned I am very sceptical that all buildings will be sprinklered as indicated. The key word here is INDICTATED and the fact that developers are in business to make a profit and do not incur additional costs unless there is a legislated requirement.

What Frasers are proposing in this development cannot be compared to regional areas for parking evaluations. This is because of the high density of apartment living and town homes with inadequate on-site parking. The reality of this development will mean there will be vehicles parked on streets 24/7. This impacts on space for firefighting operations. If there is a fire in one of these residential buildings the following criteria need an area to use:

1. An area for incident management to be set up. If the incident is large enough the mobile command centre will come down from Alexandria. It is the size of a bus.
2. Staging, this is where appliances wait until tasked,
3. Rehabilitation area, this is where firefighters go to be rehydrated and assessed by ASNSW
4. Recycling area, this is where fire-fighters go when they are waiting to be re-tasked.
5. If there are casualties, a triage area is required,
6. There also will need to be an area for evacuees to be sent.

Another consideration that must take place is the use of an aerial appliance. If an aerial appliance is required, this would mean that the fire is significant. The priorities will be containing the fire and not letting it spread. The number one consideration at an

incident involving FRNSW is safety of firefighters. First and foremost, there will be no time or resources available to relocate any private vehicles. Who is going to move these vehicles, provided the owners are located, which then creates a danger to safety of firefighters. The incident site will be so congested due to narrow streets and the lack of on-site residential parking that has been factored in for occupants and visitors in the precinct. When you then combine FRNSW, Police, Ambulance and utilities vehicles to the mix manoeuvrability will be near impossible.

If there is a fire I can envisage, roads being closed to allow for operations. Any cars parked near the incident site will not be moved as the public will not be allowed in. Another problem that parked vehicles pose is that they will prohibit access to the hydrants should they be located on the roadways. Vehicles constantly now park over hydrants and with street parking at a premium, I am in no doubt motorists will park over hydrants. Compliance Officers are not a solution to parking issues as they are not there 24/7 and they have other areas to manage.

Response for vehicles from FRNSW and other emergencies services and other agencies that present is essential such as an electricity authority, will be hindered due to the lack of parking in residential buildings, visitors to the area, and the narrow road network. It will be a logistical nightmare and I do not look forward to responding to an incident in the Shellcove Boat Harbour Marina in my role as a Duty Commander for FRNSW. As Frasers have stated that all buildings are to be sprinklered, if the modification application is approved, please make the sprinkling of all buildings a condition of approval.

The geographic size and populations that Kiama and Oak Flats Ambulance stations cover is as follows:

Currently Shellharbour City covers an area of 147 square km with a population of 68, 460, which gives them a density of 465.7 per square km. By comparison, Kiama Council covers an area of 258 square km with a population 21, 464, which gives them a density of 83.19 per square km.

The ninth issue outlined is under General Infrastructure is that Ambulance Service of NSW is already inadequate for the region – with the additional population increase, there needs to be more services made available.

The response to this is as follows,

An ambulance station is located within the 5km catchment radius and a further station is located within the 10km catchment radius of the site.

MacroPlan's benchmark analysis determines that this provision is appropriate. This is simply once again a false claim. As previously mentioned what MacroPlan's analysis states that **there is likely to be an** adequate supply of ambulance stations in the catchment radius.

There is a huge difference between an. **adequate supply and there is likely to be an** adequate supply of ambulance stations in the catchment radius. Given the geographic size

and the fact that Shellharbour has a growing and ageing population, and the additional time that will be required the Ambulance Service is quite clearly inadequately resourced. Once again MacroPlan has no understanding of how Ambulance Service NSW (ASNSW) operates and the response delays they encounter due to issues such as waiting with a patient at a hospital and having to transport a patient to Sydney. Currently ASNSW is not able meeting its service delivery indicators in the Shellharbour/Kiama areas. When you add the major developments underway in the Shellharbour City Local Government Area of Shell Cove Boat Harbour (1566 dwellings), Shell Heights (400 lots) Links Golf Course Shell Cove (42 lots) Tullimbar (1800) and Calderwood (4800) with the geographic size and the fact that Shellharbour has a growing and ageing population, and the additional time that will be required for ASNSW to reach patients in low and high-rise buildings the Ambulance Service is quite clearly inadequately resourced.

Having read Ethos Urbans responses to concerns raise in submissions I cannot find any response to the increase in school population, in addition, the fact that it is Education Department policy that it is every child's basic human right to attend the school whose catchment area they reside in.

Macro Plan's states on their revised edition on Page 39 that from 2008 to now there has been a 29% increase of primary schools. Within 5km there is 16 schools that equates to nearly 5 schools having been built from 2008, this is simply not the case. Once again one must question the accuracy of MacroPlan's benchmark assessment.

I would have commented on other key issues raised; however, I have limited my response due to being given only fourteen days to respond. I find that this amount of time is inadequate, especially given the amount of time that the proponents agent has been allocated to respond within. This application for additional dwellings in my opinion is problematic and is a disservice to the community. It is simply Shellharbour Council and Frasers Property group maximising revenue. People should come before profit and areas should be sufficiently resourced with emergency services and/or have plans to increase their capabilities in-line with population growth before approval is granted.

Ethos Urban consistently cited Macroplan's benchmark assessment in this document, however as I have articulated in the area of my expertise they are factually incorrect. This leads me to be extremely concerned as to the validity of all other responses in this document and hope that you will be thorough in your assessment of all responses to key issues raised as I obviously do not have the timeframe to fully investigate these matters myself. Any increase in dwellings must further compound the already unsatisfactory traffic and parking conditions imposed by the original planning, and alongside the inclusion of unsightly acoustic walls to 7m, is not an acceptable option for residents.

Andrew Erlik.