

23 May 2019

EPM Projects Pty Ltd
Level 2, 146 Arthur Street
North Sydney NSW 2060
Attn: Nick Archer

Dear Nick,

RE: Response to submissions - Sandon Point Concept Plan MP06-0094 MOD 5

Anglicare commissioned Peterson *Bushfire* to provide a response to the matters involving bushfire protection raised within the agency referrals and public submissions relating to the Section 75W Modification 5 application to the Sandon Point Concept Plan MP06-0094 for the proposed Anglicare development at Lots 2 and 3 Sturdee Avenue, Bulli.

The relevant referrals and submissions and a response to each are listed below. All refer to the provision of a 6 m defendable space between the proposed development and the Turpentine Forest rather than a 20 m Asset Protection Zone (APZ).

Agency referral – NSW Rural Fire Service (RFS)

The RFS response (dated 30th January 2019) raises no objection to the modification proposal and recommends that the current approved bushfire requirements listed in Schedule 3 of the Concept Plan approval remain unchanged.

The RFS were consulted by email to seek confirmation that the approved defensible space strategy around the Turpentine Forest was acceptable. RFS responded on 22 May 2019 providing this confirmation (refer to attached RFS email).

Agency referral – Wollongong City Council

Council expresses concern as to whether RFS are satisfied with the proposed defensible space strategy, and the flow-on effects on the outcomes of the Biodiversity Development Assessment Report and the Vegetation Management Plan (both prepared by Cumberland Ecology, 2018) if the 6 m defensible space increases in dimension to a 20 m wide Asset Protection Zone.

The confirmation provided by RFS on the acceptance of the defensible space strategy (see above) should provide Council with confidence on the applicability of the Cumberland Ecology reports.

Public submissions

The public submissions either express a view of inadequacy of the 6 m defensible space for bushfire protection for the proposal or perceived impacts on the Turpentine Forest to establish the defensible space.

The appropriateness of the defensible space was presented in the Bushfire Assessment letter prepared by Peterson Bushfire, 19 July 2018. Its important to note that the Turpentine Forest, surrounding riparian areas and the development site are not identified as 'bushfire prone land' and therefore the assessment of bushfire protection and the application of bushfire protection measures to the development is not a statutory requirement. This is confirmed by RFS in their letters 30 March 2007 and 20 January 2019. The acceptance of the defensible space strategy by RFS has been documented since March 2007, including their most recent letter 20 January 2019 and attached email 22 May 2019.

Peterson Bushfire refers to the consulting ecologist (Cumberland Ecology) to respond to comments made regarding potential environmental impacts of the defensible space on the Turpentine Forest.

Please contact the undersigned should you require additional information or clarification.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Peterson', with a stylized, cursive script.

David Peterson
Director

Attachment – NSW Rural Fire Service correspondence 22 May 2019

Re: Seeking clarification - Sandon Point Concept Plan Modification 5

AL

Alan Bawden

Wed, 22 May 2019 3:32:39 PM +1000

"David Peterson" <david@petersonbushfire.com.au>



 **TLS** [Learn more](#)

Thanks for question David

The subject land, rightly or wrongly is not mapped BFPL.

Accordingly, the NSW RFS accepts the 6 metre wide defendable space as an appropriate outcome, given the retained and proposed on-site vegetation.

Alan Bawden

Team Leader - Development Assessment & Planning

NSW Rural Fire Service

Sent from my iPhone

On 17 May 2019, at 8:00 am, David Peterson <david@petersonbushfire.com.au> wrote:



Hi Alan,

I hope all is well.

I'm writing to you for clarification on the last paragraph of your letter (attached) which recommends the current bushfire requirements listed in Schedule 3 of the Concept Plan for Sandon Point remain unchanged. The planning team want to make sure that you are referring to the 6 m wide defendable space that is described in the attached letter.

Perhaps it would assist to chat over the phone today?

Regards
Dave

<1.jpg>

<RFS Submission.pdf>

<18079 Bushfire Assessment - Sandon Point Concept Plan MOD5 v2.pdf>

1 Attachment

1.jpg