

## **G - Bushfire Advice**

## G - BUSHFIRE ADVICE

### Department of Planning – letter dated 28/2/2008

Bushfire – The regime for ongoing maintenance of bushfire risk mitigation measures is not clear and the width of perimeter roads is not compliant with Planning for Bushfire Protection 2006.

#### Comment:

The design of the development precincts [north & south] provides for the Asset Protection Zone to be located within the width of the perimeter road reserve and building line setback with a fuel managed corridor along the access road to the southern development precinct and to both sides of the access corridor within the western portion of the site.

The proposed lots within the development precincts will also be managed as an Asset Protection Zone, whilst retaining much of the existing tree canopy so as to maintain habitat connectivity across the development precincts.

The management of the perimeter Asset Protection Zone to the lots will remain the responsibility of the Community Association with the curtilage to the future buildings, including the Asset Protection Zone within the front setback to the lots, managed by the individual landowner. The management of the Fuel Management corridor to the access road to the southern precinct and within the western portion of the site will be undertaken by the Community Association, in accordance with a Fire Management Plan that will detail the protocols of fuel reduction in these areas.

The subdivision layout provides for perimeter roads between the bushfire hazard and the proposed residential development. The width of carriageway of these roads is 8.0 metres, therefore complying with the deemed-to-comply provisions for Public Road access, as defined by Section 4.1.3(1) Public Roads of Planning for Bushfire Protection 2006.

### Department of Planning – Key Issues

#### Item 6 – Bushfire

6(a) The EA is not clear regarding the size or the necessary management measures for the proposed ‘fuel managed corridors’

#### Comment:

The Bushfire Protection Assessment prepared by ABPP recommends the following protection measures for the fuel managed corridors to the access roads:

“Furthermore, it is recommended that to increase the safety to road users, a fuel managed corridor shall be provided in the Dry Blackbutt Open Forest vegetation between the collector road carriageway and the eastern alignment of the Pacific Highway carriageway.

It is further recommended that a 20 metre wide managed corridor be provided within the Dry Blackbutt Open Forest on the eastern side of the southern section of the collector road. The management of these corridors shall be undertaken by the Community Association in accordance with the “Moonee Waters” Fire Management Plan”.

In summary, the fuel managed corridor on the western side of the collector road will extend to the western boundary of the site and will be managed, by the Community Association, to remove the accumulated ground fuel within this corridor of vegetation. The eastern side of the corridor will be fuel managed to a width of 20 metres.

The ABPP report further states:

“Within Precinct B, the internal road network links to a new road constructed within the Crown Road Reserve to the south and west of the precinct with a primary access road extending to the west along the Crown Road Reserve separating the development property and the adjoining approved North Sapphire Beach development. Whilst this access road will be safe from potential impact of bushfires from the south [due to the development on the adjoining land] it is likely to be closed during fires burning in the vegetation to the north of the road carriageway.

Therefore, it is recommended that a 30 metre wide managed corridor be provided within the Dry Blackbutt Open Forest vegetation along the northern side of the road. The management of this corridor shall be undertaken by the Community Association in accordance with the “Moonee Waters” Fire Management Plan”.

In summary, the fuel managed corridor to the new public road within the existing Crown Road Reserve that provides access to the southern development precinct from the collector road is 30 metres wide and the management of this corridor will be undertaken by the Community Association, in accordance with the prescriptions of the Moonee Waters” Fire Management Plan, to remove the accumulated ground fuel within this corridor of vegetation.

The management protocols will represent a Strategic Fire Advantage Zone [SFAZ] with the prescribed method of

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management being hazard reduction burning in accordance with the management protocols and timing provided by the "Bushfire Environment Assessment Code for Asset Protection and Strategic Fire Advantage Zones". These management protocols will therefore not have an ecological impact on either the vegetation within the managed corridor or on the adjacent conservation area/s.

6(b) Planning for Bushfire Protection 2006 states that urban perimeter roads must have a minimum carriageway width of 8m kerb to kerb.

### Comment:

This has been addressed in the revised subdivision layout.

6(c) The Bushfire Protection Assessment at Appendix G of the EA states that emergency egress is available from Precinct B to the adjacent North Sapphire development

### Comment:

The Bushfire Protection Assessment states:

"Within Precinct A, the internal road network links to a central spine road that runs east to west through the precinct, connecting to a proposed "slip" road which is to be constructed within the cleared powerline corridor that runs along the western side of the precinct. This collector road will extend to the north, connecting to the internal road network of the proposed residential development to the north of the property and linking to the existing road network in the Moonee Village. This new road will exit onto the Pacific Highway at the current Pacific Highway/ Moonee Beach Road intersection".

This is a statement made on the basis that a future collector road is shown on the Moonee DCP to extend north to the road network in the Moonee Village. It is also recognised that this connection will occur in the future, prompting the need to provide temporary emergency egress onto the Pacific Highway in the locations shown of the Figure 1 "Plan of Bushfire Protection Measures" in Section 7 of the ABPP report.

The need for the retention of these emergency exits will be removed once the collector road is connected to the north, therefore providing an alternate access/exit route from Precinct B.

6(d) The Bushfire Protection Assessment states that the emergency access link from Precinct A to the Pacific Highway will be fitted with locked bollards. How will the unlocking of these bollards be managed during a bushfire emergency?

### Comment:

It is the intention to lock the bollards with padlocks which are compatible with the NSW Rural Fire Service fire trail padlock system.

This will enable attending Rural Fire Service crews to unlock the

bollards. The Community Association will also be responsible for the management and distribution of the padlock keys to nominated residents, thus ensuring an effective removal of the bollards in an emergency situation.

### DNR – Linden Bird – Site Inspection Report [28.2.2006]

Pages 3 & 4

"Whether the proposed development has allowed for an adequate level of clearance to meet bushfire hazard lines and what impact this has on ecology"

### Comment:

The proposed development layout provides for Asset Protection Zones, located within the width of the perimeter road and building line setback, which exceed the deemed-to-comply widths required by Planning for Bushfire Protection 2006. The deemed-to-comply width of the Asset Protection Zone ranges from 14 - 20 metres, not 40 metres as stated in the DNR letter.

The classification of the vegetation on the site as Category 1 bushfire prone vegetation records that the site contains "forest" or "woodland" vegetation for the purpose of determining whether development on the site is triggered by the vegetation and Sections 79BA and 91(1) apply to the subdivision of the land for residential purposes or the construction of a Special Fire Protection Purpose development on the site.

The category classification of the vegetation does not determine the potential bushfire risk as "bushfire risk" is defined by Planning for Bushfire Protection 2006 as:

"The chance of a bushfire igniting, spreading and causing damage to assets of value to the community. Risk may be rated as being extreme, major, moderate, minor or insignificant and is related to the vulnerability of the asset".

On page 4 Linden Bird states that should a "deferred Tourist Village" proposal occur on Precinct C, an Asset Protection Zone of 100 metres would be required "which will significantly impact on the SEPP 14 Wetland, Littoral Rainforest and EEC Swamp Sclerophyll Forest".

This advice is also incorrect as, if there were to be a Tourist Village located within Precinct C, the width of the Asset Protection Zone to such facility would be 50 metres – not the 100 metres recommended by Linden Bird.

Annand Alcock Urban Design  
Level 3,  
15 Wentworth Avenue,  
East Sydney  
NSW 2010



**Attention: Peter Annand**

**Re: Moonee Waters**

Dear Peter,

Further to your request to review the Authorities responses to the Moonee Waters development proposal I provide the following reply:

- **Department of Planning – letter dated 28/2/2008**

**Bushfire** – *The regime for ongoing maintenance of bushfire risk mitigation measures is not clear and the width of perimeter roads is not compliant with Planning for Bushfire Protection 2006.*

**Comment:**

The design of the development precincts [north & south] provides for the Asset Protection Zone to be located within the width of the perimeter road reserve and building line setback with a fuel managed corridor along the access road to the southern development precinct and to both sides of the access corridor within the western portion of the site.

The proposed lots within the development precincts will also be managed as an Asset Protection Zone, whilst retaining much of the existing tree canopy so as to maintain habitat connectivity across the development precincts.

The management of the perimeter Asset Protection Zone to the lots will remain the responsibility of the Community Association with the curtilage to the future buildings, including the Asset Protection Zone within the front setback to the lots, managed by the individual landowner. The management of the Fuel Management corridor to the access road to the southern precinct and within the western portion of the site will be undertaken by the Community Association, in accordance with a Fire Management Plan that will detail the protocols of fuel reduction in these areas.

The subdivision layout provides for perimeter roads between the bushfire hazard and the proposed residential development. The width of carriageway of these roads is 8.0 metres, therefore complying with the deemed-to-comply provisions for Public Road access, as defined by Section 4.1.3(1) Public Roads of *Planning for Bushfire Protection 2006*.

- **Department of Planning – Key Issues**

**Item 6 – Bushfire**

- 6(a)** *The EA is not clear regarding the size or the necessary management measures for the proposed ‘fuel managed corridors’*

**Comment:**

The Bushfire Protection Assessment prepared by ABPP recommends the following protection measures for the fuel managed corridors to the access roads:

*“Furthermore, it is recommended that to increase the safety to road users, a fuel managed corridor shall be provided in the Dry Blackbutt Open Forest vegetation between the collector road carriageway and the eastern alignment of the Pacific Highway carriageway.*

*It is further recommended that a 20 metre wide managed corridor be provided within the Dry Blackbutt Open Forest on the eastern side of the southern section of the collector road. The management of these corridors shall be undertaken by the Community Association in accordance with the “Moonee Waters” Fire Management Plan”.*

In summary, the fuel managed corridor on the western side of the collector road will extend to the western boundary of the site and will be managed, by the Community Association, to remove the accumulated ground fuel within this corridor of vegetation. The eastern side of the corridor will be fuel managed to a width of 20 metres.

The ABPP report further states:

*“Within Precinct B, the internal road network links to a new road constructed within the Crown Road Reserve to the south and west of the precinct with a primary access road extending to the west along the Crown Road Reserve separating the development property and the adjoining approved North Sapphire Beach development. Whilst this access road will be safe from potential impact of bushfires from the south [due to the development on the adjoining land] it is likely to be closed during fires burning in the vegetation to the north of the road carriageway.*

*Therefore, it is recommended that a 30 metre wide managed corridor be provided within the Dry Blackbutt Open Forest vegetation along the northern side of the road. The management of this corridor shall be undertaken by the Community Association in accordance with the “Moonee Waters” Fire Management Plan”.*

In summary, the fuel managed corridor to the new public road within the existing Crown Road Reserve that provides access to the southern development precinct from the collector road is 30 metres wide and the management of this corridor will be undertaken by the Community Association, in accordance with the prescriptions of the *Moonee Waters” Fire Management Plan*, to remove the accumulated ground fuel within this corridor of vegetation.

The management protocols will represent a Strategic Fire Advantage Zone [SFAZ] with the prescribed method of management being hazard reduction burning in accordance with the management protocols and timing provided by the “*Bushfire Environment Assessment Code for Asset Protection and Strategic Fire Advantage Zones*”. These management protocols will therefore not have an ecological impact on either the vegetation within the managed corridor or on the adjacent conservation area/s.

- 6(b)** *Planning for Bushfire Protection 2006 states that urban perimeter roads must have a minimum carriageway width of 8m kerb to kerb.*

**Comment:**

This has been addressed in the revised subdivision layout.

- 6(c)** *The Bushfire Protection Assessment at Appendix G of the EA states that emergency egress is available from Precinct B to the adjacent North Sapphire development*

**Comment:**

The Bushfire Protection Assessment states:

*“Within Precinct A, the internal road network links to a central spine road that runs east to west through the precinct, connecting to a proposed “slip” road which is to be constructed within the cleared powerline corridor that runs along the western side of the precinct. This collector road will extend to the north, connecting to the internal road network of the proposed residential development to the north of the property and linking to the existing road network in the Moonee Village. This new road will exit onto the Pacific Highway at the current Pacific Highway/ Moonee Beach Road intersection”.*

This is a statement made on the basis that a future collector road is shown on the Moonee DCP to extend north to the road network in the Moonee Village. It is also recognised that this connection will occur in the future, prompting the need to provide temporary emergency egress onto the Pacific Highway in the locations shown of the Figure 1 “*Plan of Bushfire Protection Measures*” in Section 7 of the ABPP report.

The need for the retention of these emergency exits will be removed once the collector road is connected to the north, therefore providing an alternate access/exit route from Precinct B.

- 6(d)** *The Bushfire Protection Assessment states that the emergency access link from Precinct A to the Pacific Highway will be fitted with locked bollards. How will the unlocking of these bollards be managed during a bushfire emergency?*

**Comment:**

It is the intention to lock the bollards with padlocks which are compatible with the NSW Rural Fire Service fire trail padlock system.

This will enable attending Rural Fire Service crews to unlock the bollards. The Community Association will also be responsible for the management and distribution of the padlock keys to nominated residents, thus ensuring an effective removal of the bollards in an emergency situation.

- **DNR – Linden Bird – Site Inspection Report [28.2.2006]**

**Pages 3 & 4**

*“Whether the proposed development has allowed for an adequate level of clearance to meet bushfire hazard lines and what impact this has on ecology”*

**Comment:**

The proposed development layout provides for Asset Protection Zones, located within the width of the perimeter road and building line setback, which exceed the deemed-to-comply widths required by *Planning for Bushfire Protection 2006*. The deemed-to-comply width of the Asset Protection Zone ranges from 14 - 20 metres, not 40 metres as stated in the DNR letter.

The classification of the vegetation on the site as Category 1 bushfire prone vegetation records that the site contains “forest” or “woodland” vegetation for the purpose of determining whether development on the site is triggered by the vegetation and Sections 79BA and 91(1) apply to the subdivision of the land for residential purposes or the construction of a Special Fire Protection Purpose development on the site.

The category classification of the vegetation does not determine the potential bushfire risk as “bushfire risk” is defined by *Planning for Bushfire Protection 2006* as:

*“The chance of a bushfire igniting, spreading and causing damage to assets of value to the community. Risk may be rated as being extreme, major, moderate, minor or insignificant and is related to the vulnerability of the asset”.*

On page 4 Linden Bird states that should a “deferred Tourist Village” proposal occur on Precinct C, an Asset Protection Zone of 100 metres would be required *“which will significantly impact on the SEPP 14 Wetland, Littoral Rainforest and EEC Swamp Sclerophyll Forest”*.

This advice is also incorrect as, if there were to be a Tourist Village located within Precinct C, the width of the Asset Protection Zone to such facility would be 50 metres – not the 100 metres recommended by Linden Bird.

Yours faithfully,



Graham Swain.

Managing Director,

**Australian Bushfire Protection Planners Pty Limited**

2.10.2008