



NSW RURAL FIRE SERVICE



Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Your Reference: 17/11065
Our reference: L11/0003

20 September 2017

Attention: Att Bruce Colman
Director Land Release

Dear Bruce,

Invitation to RFS to comment - EXHIBITION OF PLANS FOR THE WILTON PRIORITY GROWTH AREA

In response to your letter (undated) inviting the NSW Rural Fire Service (RFS) to comment on the current exhibition of the Interim Land Use and Infrastructure Plan (LUIIP) for the Wilton Priority Growth Area and the draft plan for the Wilton South East precinct, the RFS provides the following comments for your consideration.

Strategic Bush Fire Study

The Wilton Priority Growth Area contains bush fire prone land and is within a locality subject to significant bush fire risk from surrounding land, which has a history of fire.

The RFS recommends that a Strategic Bush Fire Study be prepared prior to progression of re-zonings and before further precinct planning occurs to assist and inform proponents within the Wilton Priority Growth Area precincts to;

- undertake streamlined re-zonings/planning submissions; and
- to ensure future subdivision applications of the land are consistent with the layouts, densities and proposed infrastructure contained within the adopted LUIPs and subsequent precinct plans.

A Strategic Bush Fire Study provides the opportunity to ensure that where development occurs on bush fire prone, it is appropriately located and further that there has been consideration of the proposed infrastructure locations and capacities will provide adequately for planned future communities and emergency services within a bush fire prone landscape.

Access

In recognition of the size of the planned communities within the Wilton Priority Growth Area, access should be considered from a strategic perspective (and only at a precinct by precinct basis) to ensure emergency service vehicles and residents evacuating in the event of an emergency are adequately provided for, and future precinct proposals can comply with Planning for Bush Fire Protection (PBP) 2006.

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There is currently insufficient information contained with the LUIP and the draft plan for the Wilton South East precinct to demonstrate that the infrastructure layout (including upgrades, end carrying capacities, new intersection points, secondary egress options etc) will adequately cater for the fully developed communities, with regard to providing 'safe' access in the event of an emergency, within the Wilton Priority Growth Area.

The Strategic Bush Fire Study should include an assessment of the location and capacities of proposed local and major roads to be used in an emergency evacuation scenario, including the distance of travel for residence in emergency evacuations to a safe location. Importantly, consideration of the road network with regard to potential impacts from bush fire on roads such as conflict points, heat, smoke, flames and blockages such as fallen trees etc should be provided at this stage. Additionally, access throughout the staging/release of the precincts should be considered to ensure all stages provide suitable access in the event of an emergency and do not rely on roads which may not yet be constructed.

It should be noted that planning rezoning submissions within the Wilton Priority Growth Area which have been provided to the RFS for comment to date are not consistent with access requirements of PBP 2006. Specifically, proposed future residential areas will result in significant vehicular travel distances to reach appropriate 'through' road egress options, in the event of a bush fire emergency (such as the Hume Highway), without secondary access/egress options. The ability of the proposed road network to facilitate a rapid evacuation, based on the proposed residential densities in the area, during a bush fire event have not been addressed.

Hazards

The RFS is aware that significant portions of the Wilton Priority Growth Area are likely to constitute grassland hazards (which may not be currently mapped as bush fire prone land). The RFS notes the legislative requirement is for bush fire prone land (BFPL) maps to be reviewed every five years, and that the current NSW RFS 'Guide for Bush Fire Prone Land Mapping' (Version 5b dated November 2015) now requires grassland hazards to be mapped. This is consistent with introduction of Amendment II of the Australian Standard AS 3959-2009 Construction of buildings in bushfire-prone areas on 1 May 2011, which included grasslands as a hazardous vegetation category. As such, grassland hazards should be addressed as part of the Strategic Bush Fire Study, including provision of asset protection zones, ongoing management of residue land throughout the staging of the precincts (to ensure areas of unmanaged land are suitably managed during the early stages of development) within each precinct and within adjoining precinct areas.

As shown in the LUIP maps, portions of the site are considered high conservation value land and are likely to be retained for conservation purposes. The Strategic Bush Fire Study should address the ongoing management of these areas as a potential hazard to residents and also as a risk that requires ongoing management from a bush fire risk perspective (i.e provision of suitably located fire trails for fire fighters to access the areas and conduct hazard mitigations works/fuel management activities and/or carry out defensive actions to protect assets).

The RFS notes that the likely future conservation areas (and their potential impacts on broader bush fire management) cross precinct borders. The preparation of Strategic Bush Fire Study at the LUIP stage will ensure management initiatives/mitigative measures are considered across precincts.

Conclusion

The RFS is committed to facilitating appropriate development on bush fire prone land and wishes to continue to work collaboratively with the NSW Planning and Environment towards achieving sustainable and affordable growth in NSW. The provision of a Strategic Bush Fire Study at this stage of the Wilton Priority Growth Area process, and prior to progression of land re zoning, will ensure:

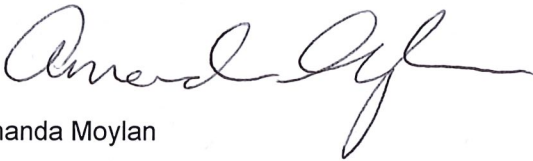
- better planning for future emergency operational response requirements and resourcing of emergency services.
- strategic consideration of vehicle access across the whole of the Wilton Growth Area that caters for safe evacuation of residents during a fire whilst providing access for emergency service vehicles with minimal points of conflict/danger and provision of suitable alternative access options (if required).
- reduced potential for conflict in land use objectives (i.e between environmental management of conservation land and the requirement for potential bush fire management/mitigative measures).
- streamlined delivery of affordable housing through (i) reducing likelihood that future land owners bear the costs of bush fire measures required as a result of non-compliance with Planning for Bush Fire Protection 2006 (i.e increased construction standards for dwellings, need for asset protection zone easements over adjoining lots, requirements for emergency/secondary access provisions or additional static water supply) (ii) streamlined re-zoning and subdivision applications for future precincts within the growth area that are compliant with the requirements of Planning for Bush Fire Protection 2006.

- a better outcome for communities within the Wilton Priority Growth Area in terms of community resilience in the presence of bush fires.

It should be noted that this correspondence has highlighted key issues with regard to bush fire planning within the Wilton Priority Growth Area and any Strategic Bush Fire Study should address the detailed framework provided by the RFS in previous advice.

Should you wish to discuss the matters contained in this submission, please contact Martha Dotter in the Planning and Environment Services section on 02 4472 0613.

Yours sincerely



Amanda Moylan

Team Leader Development Assessment and Planning

Planning and Environment Services (South)

ADDENDUM – List of previous comments provided by the NSW RFS

The NSW RFS has previously provided comment on the broader "Greater Macarthur Preliminary Strategy", the "Wilton Junction Precinct", and the "Wilton South East Precinct" via correspondence dated:

- 19 November 2012 "Wilton Junction Master Plan"
- 20 December 2013 "Planning Instrument for Wilton Junction Precinct"
- 18 November 2014 "Planning Instrument for Wilton Junction Precinct"
- 16 October 2015 "Greater Macarthur Preliminary Strategy and proposed changes to SEPP Sydney Region Growth Centres"
- 30 January 2017 "Wilton South East Precinct"
- Email dated 9 August 2017 "Strategic Bush Fire Study – Wilton and Greater Macarthur Priority Growth areas"