



General Manager
Northern Beaches Council
PO Box 882
Mona Vale NSW 1660

Your reference: PEX2013/0003
2016/274281
Our reference: LEP/0129
18 October 2017

Dear Mr Ferguson

Planning Proposal – Rezoning of Land to Permit Residential Development at Ralston Avenue, Belrose

I refer the above rezoning proposal and the *Supplementary Planning Report & Updated Planning Proposal* prepared by Urbis dated 27 April 2017, and the additional information commissioned by the applicant and prepared at the by Eco Logical Australia dated 16 August 2017, titled *Ralston Avenue Belrose Planning Proposal: Review*.

The NSW Rural Fire Service (NSW RFS) has further reviewed the modified proposal and supplementary report, and advises that the proposed rezoning of the site to allow significant residential development is not supported. The revised submission and minor plan modifications do not adequately address the issues previously raised by the NSW RFS, and do not significantly reduce the bush fire risk to potential future residents.

The report prepared by Eco Logical Australia attempts to quantify the value of the proposal proceeding with a better outcome being achieved for the existing residential development on the interface, against the current situation if the proposal did not proceed. The report proposes that future new development would serve as a buffer to the existing residential housing and electrical substation concluding that the risk from bush fire to the community would be reduced overall.

The report showed that any benefit to the existing community including the Sydney East Substation would be limited, and is reliant upon bush fire hazard reduction works on private lands, which could be undertaken even if the proposal did not proceed. The report also showed that potential future occupants of the developed site would have an inadequate response time to safely and effectively evacuate the site in the event of a wild fire.

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The NSW RFS considers that the proposal as amended is not consistent with s.117(2) *Environmental Planning and Assessment Act 1979* as it does not achieve the primary objectives: to protect life, property and the environment from bush fire hazards by discouraging the establishment of incompatible land uses in bush fire prone areas; and to encourage the sound management of bush fire prone areas.

The Planning Proposal fails to demonstrate how the rezoning will:

- not increase the risk to life from bush fires, including firefighters;
- not place inappropriate development in areas exposed to an unacceptable bush fire risk;
- ensure that appropriate bush fire protection measures can be afforded to properties at risk;
- minimise negative impacts on the surrounding environment;
- ensure that provision is made for adequate evacuation for the community; and
- ensure that development is capable of complying with *Planning for Bush Fire Protection 2006* (PBP).

The proposal cannot meet the aims and objectives of *Planning for Bush Fire Protection 2006* (PBP) – (to provide for the protection of human life (including firefighters) and to minimise impacts on property from the threat of bush fire). Concerns are also held in relation to the ability of the conceptual subdivision design and layout to meet the future requirements of PBP as follows:

- The proposal requires APZs on land steeper than 18 degrees where on-going management practices are difficult. Clearing of large areas of vegetation destabilises the slope causing erosion and the advantage of an APZ is reduced as the canopy fuels are more readily available to a fire.
- Some dwellings will be located on the interface where slopes exceeding 20 degrees. The current building standards do not provide deemed-to-satisfy provisions for the determination of the maximum desired bushfire attack level (BAL 29) in these situations.
- The site is vulnerable at several pinch points along the perimeter road, potentially isolating the peninsular in the event of wild fire. Safe evacuation may not be available and with no refuge space.
- The proposed mitigation works to reduce bush fire risk to the site would place increased demand on resources and would not be sustainable.
- The proposed construction of new fire trails linking with existing fire trails is not supported as the extensive engineering works would further impact the environment.

The proposed development is likely to result in unsustainable and problematic bush fire risk management of the landscape for the NSW RFS and future land owners. This would place our own firefighting resources under increased pressure as well as placing firefighters and a new community within an unacceptable area of risk.

Accordingly, our original concerns expressed in our previous correspondence to Council in September 2016 (RFS Reference LEP/0129) still apply. The NSW RFS considers that the Planning Proposal should not proceed in its current form.

If you have any further enquiries, please do not hesitate to contact me on 8867 7960.

Yours sincerely



Nika Fomin
Manager Planning and Environment Services (East)