

11 May 2022

Frasers Property Australia
Level 2, 1C Homebush Bay Drive
Rhodes NSW 2138
Attn: Esteban Insausti

Dear Esteban,

RE: Response to agency issues –Ed Square S75 MOD12

Frasers Property Australia engaged Peterson Bushfire to review the issues raised by agencies during the public exhibition period of the Ed Square Town Centre NW S75 modification (MOD 12) in relation to matters of compliance for bushfire protection.

The table on the following page lists those issues raised by the various agencies and provides a response.

Table 1: Response to agency issues

Issue	Response
Department of Planning, Industry and Environment	
13. Clarify the APZ provision adjacent to the proposed school lot and confirm that no encroachment into the Regional Park is required.	The APZ is proposed to be reduced from 50 m to 43 m based on a performance-based solution. No encroachment into Regional Park is required.
Department of Planning and Environment – Environment, Energy and Science Group	
<p>Section 5.9 of the EA notes the western portion of Ed. Square is impacted by bush fire prone land due to the regional park woodland that lies directly to the west of the site. The APZ Assessment (Appendix J) indicates the school in the North-West Quadrant would require additional bushfire protection since it is defined as a Special Fire Protection Purpose Development (SFPP). Appendix J notes:</p> <ul style="list-style-type: none"> • Eco Logical Australia (5 August 2021) recommend a 50m APZ from the woodland vegetation on the western side of MacDonald Road • using the NBC Bushfire Attack Assessor, these slopes result in an APZ of 43m for Town Centre NW as mapped in Figure 1. <p>Section 5.2 of the EA indicates revised maps including a Bushfire Asset Protection Zones map will supersede those currently approved under MOD 4 and those submitted with MOD 11 (page 24). EES notes:</p> <ul style="list-style-type: none"> • The amended Edmondson Park South Bushfire Asset Protection Zone Map in Appendix E provides a 43-50m wide APZ to protect the SFPP • Figure 1 (Attachment A) in Appendix J shows a 43m wide APZ for the SFPP • Figure 31 in the EA shows a 43m wide APZ for the SFPP. • Section 5.9 of the EA states “The letter recommends that a minimum 43m asset protection zone (APZ) be applied to the North-West Quadrant...”. 	<p>The recommendation is for 43 m APZ as per the Peterson Bushfire letter dated 24/11/21. The 43 m APZ is based on a performance-based solution.</p> <p>An APZ distance of 50 m has been stated in the application as a worst-case scenario where a performance-based solution is not supported.</p>

Issue	Response
<p>The RtS should clarify if the APZ for the school should be 43m or 43-50m as shown on the amended Edmondson Park South Bushfire Asset Protection Zone Map.</p>	
<p>It is important the MOD 12 proposal provides an adequate APZ (and any other bushfire protection measures) within the boundary of the SFPP land and /or Macdonald Road which is located between the school site and the Regional Park. Any APZ measures must be located entirely outside the Regional Park within the development area. This is consistent with Condition 1.10 of the Edmondson Park Concept Plan Instrument of Approval (MP10-0118) dated 18 August 2011 which states:</p> <p>1.10 Future subdivision applications are to demonstrate that the APZs are located outside any area of public open space, unless agreed to by the relevant council, and outside the regional park, unless agreed to by Office of Environment and Heritage.</p> <p>Under no circumstances should the proposed MOD 12 development require any clearing of vegetation in the Regional Park for bushfire protection or for any other reasons.</p>	<p>The recommended APZ does not involve vegetation removal or placement within the Regional Park. The APZ will comprise of the managed portion of Macdonald Road (being outer footpath and road) and within the school site itself.</p>
<p>In addition to the RtS providing further details on the APZ requirements, it is recommended the MOD 12 proposal considers factors such as the ability to safely evacuate the school during a potential bushfire in the Regional Park.</p>	<p>The site/school will be able to comply with 'Planning for Bush Fire Protection 2019' regarding evacuation capability. This would be subject to the future SSD Application for the school.</p> <p>The surrounding road network provides an alternate access option ensuring compliance.</p>
<p>The Illustrative Design Scheme Report notes Henderson Lane will be used for direct access to school – priority drop off/pick (page 23). Henderson Lane links between Macdonald Road and Sergeant Street and allows for one-way traffic with an exit only onto Macdonald Road (see Illustrative Design Scheme Report, page 25).</p>	<p>'Planning for Bush Fire Protection 2019' requires an alternate access option to through public roads. The school will have access to Macdonald Road and Sergeant Street.</p> <p>Macdonald Road is a dual carriage way road and acts as a perimeter road to the development. It offers access in both north and south directions and achieves compliance with 'Planning for Bush Fire Protection 2019'. Schools and SFPP development in general may utilise perimeter roads for evacuation.</p>
<p>Macdonald Road is one of two main north-south roads within the Ed. Square site and is located between western boundary of the school site and the eastern boundary of the Regional Park. Due to the proximity of Macdonald Road to the Regional</p>	

Issue	Response
<i>Park it may not provide a safe evacuation route during a bushfire (see Figure 31 in the EA). The RtS should provide details on the proposed evacuation route from the school site.</i>	
<i>Section 4 of the EA states “the proposed amendments will not give rise to any new or different environmental impacts than those originally considered”. Locating the school near the Regional Park must not result in any impacts on the Regional Park.</i>	There will be no impacts to Regional Park as a result of the school development.

Please don't hesitate to get in touch should you seek clarification.

Yours sincerely,



David Peterson
Director

