



NSW RURAL FIRE SERVICE



The Secretary
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Your reference: MP 10_0118 MOD 5
Our reference: D17/2312

20 November 2018

Attention: Emily Dickson

Dear Emily,

Modification to the Edmondson Park South Concept Plan (Town Centre North and Precinct 3) and Planning Controls

Reference is made to correspondence dated 5 November 2018 seeking comment in relation to the proposed modifications to the abovementioned concept plan.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the modification with regard to Section 9.1 of the *Environmental Planning and Assessment Act 1979*.

The objectives of the direction are:

- (a) *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*
- (b) *to encourage sound management of bush fire prone areas.*

The direction provides that a planning proposal must:

- (a) *have regard to Planning for Bushfire Protection 2006*
- (b) *introduce controls that avoid placing inappropriate developments in hazardous areas, and*
- (c) *ensure that bushfire hazard reduction is not prohibited within the APZ.*

Based upon an assessment of the information provided, NSW RFS raises no objections to the proposal subject to a requirement that the future subdivision of the land complies with *Planning for Bush Fire Protection 2006* or subsequent edition. This includes, but is not limited to:

- Provision of Asset Protection Zones (APZs) within the proposed lots in accordance with Table A2.4;
- Access to be provided in accordance with the design specifications set out in section 4.1.3; and,
- Services to be provided in accordance with section 4.1.3.

With regard to these requirements, the following comments are made in relation to the submitted concept plan:

Postal address

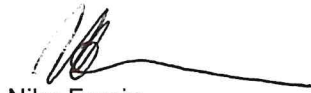
NSW Rural Fire Service
Planning and Environment Services
Locked Bag 17
GRANVILLE NSW 2141

T 1300 NSW RFS
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E records@rfs.nsw.gov.au
www.rfs.nsw.gov.au

- Larger asset protection zones (to achieve a less than 10kW/sqm radiant heat exposure) will be required for the proposed school site due to Clermont Park to the north east of the site being classified as a remnant hazard.

If you have any queries regarding this advice, please contact Matthew Apps, Development Assessment and Planning Officer, on 1300 NSW RFS.

Yours sincerely,



Nika Fomin
Manager, Planning and Environment Services (East)



Application Details

Assessing Officer	Matthew Apps	NSW RFS Reference	D17/2312
Referral agency	Department of Planning & Environment	Referral Reference	MP 10_0118 MOD 5
Stage of Proposal:	Planning Proposal	Assessed against:	PBP Aims and Objectives
Lot & Street Address	Edmondson Park South		
Proposed Development	Modification to Edmondson Park South Concept Plan (Town Centre North and Precinct 3)		
Bush Fire Report Provided	Yes	FPAA Accredited	Yes
Author, Date, Reference	Travers bushfire & ecology, 15/8/18, 18LAND06		

Assessment Summary

Proposal Details & Background

It is proposed to modify the concept plan for Edmondson Park South by undertaking the following;

- Increase the residential yield from 2 235 to 3 286 dwellings
- Increase heights of buildings
- Proposed residential mix to primarily comprise of residential flat buildings, multi-dwelling housing, studio dwellings and secondary dwellings
- Revised road layout
- Revise proposed school site from 8ha to between 2 and 6ha

Site Inspection

Was a site inspection undertaken? No - sufficient information was available to undertake an assessment

If Yes: - Date undertaken:

- Reason for inspection:

☐ Asset Protection Zones	☐ Vegetation	☐ Emergency Management & Evacuation
☐ Siting and Design	☐ Effective slope	☐ Separation distance
☐ Construction level	☐ Services	☐ Site Slope
☐ Access	☐ Landscaping	☐ Other

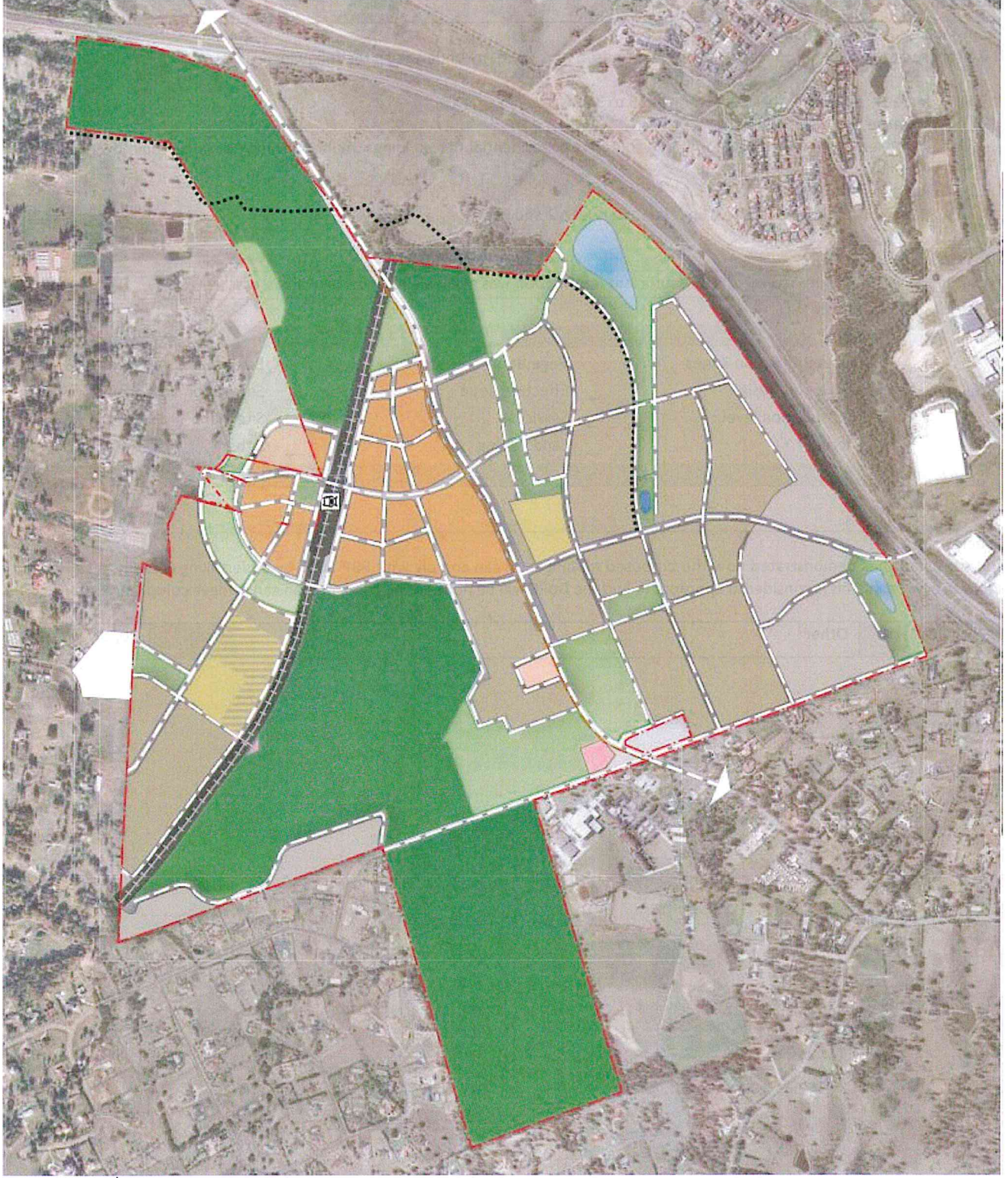
- Inspection Notes:

Conclusion

The consultant has demonstrated how the proposed modification can comply with PBP 2006 by undertaking a deem to satisfy and alternate solution approach. This is considered appropriate and the DoPE will be notified the concept plan can achieve compliance.

Recommendation	Other	Date:	20/11/2018
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Development Plan(s)



KEY

- Site Boundary
- L.G.A. Boundary
- General Residential
- Environmental Living
- Mixed Use Town Centre
- Public Open Space
- Regional Park
- Heritage Precinct
- Substation
- TCA Rail Corridor
- Train Station
- Schools
- Pedestrian Link over TCA Corridor
- Ornamental Pond
- OSD Basin
- Sewer Line
- Road Links
- Former School Site
- General Residential/Schools

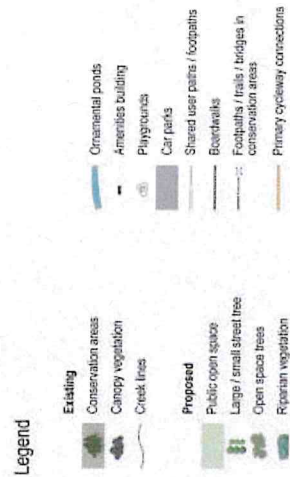
Dwg Name: Concept Plan (Mod 2)

Date: June 2018



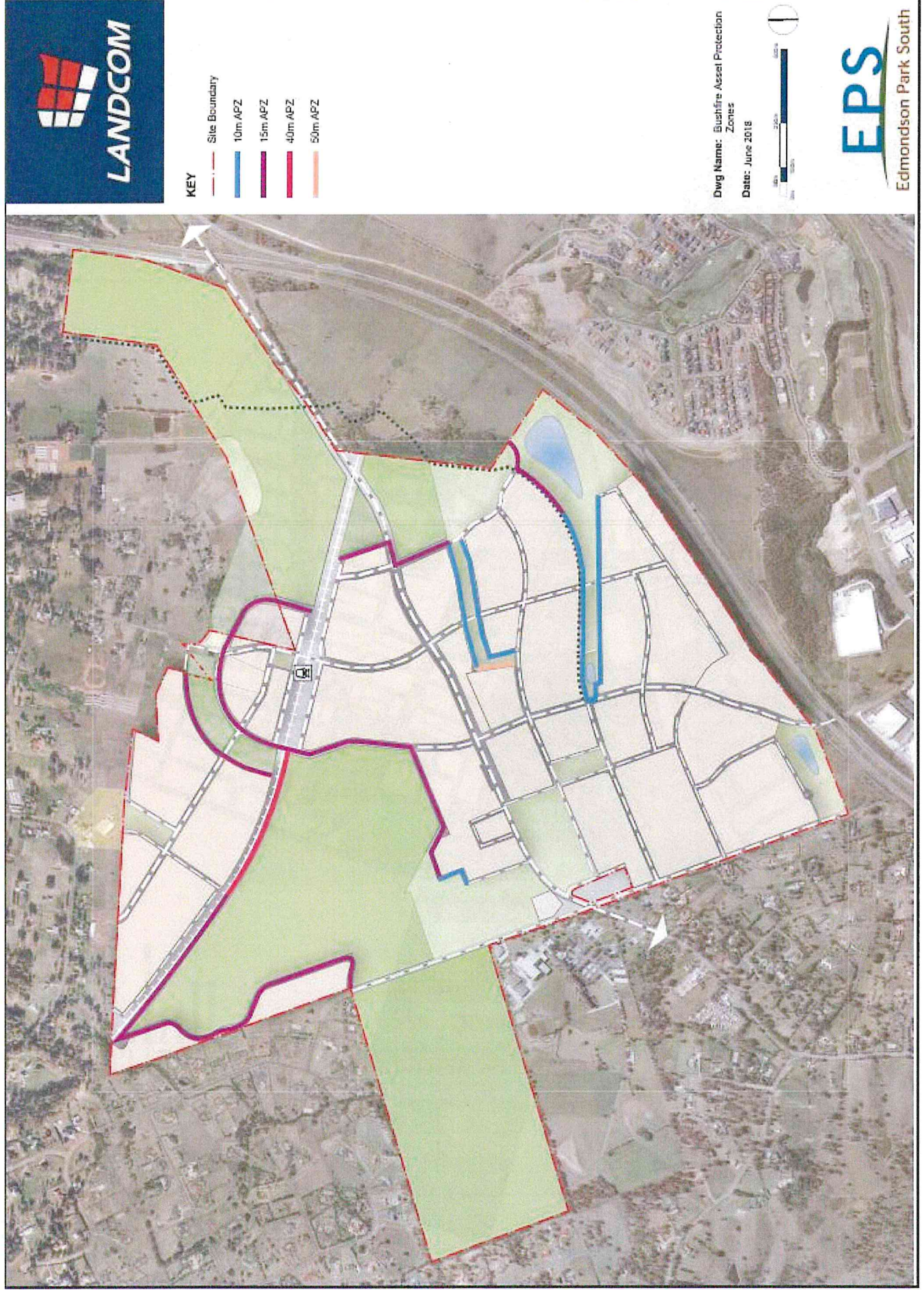
Liverpool Local Government Area
Schedule of Open Space Facilities

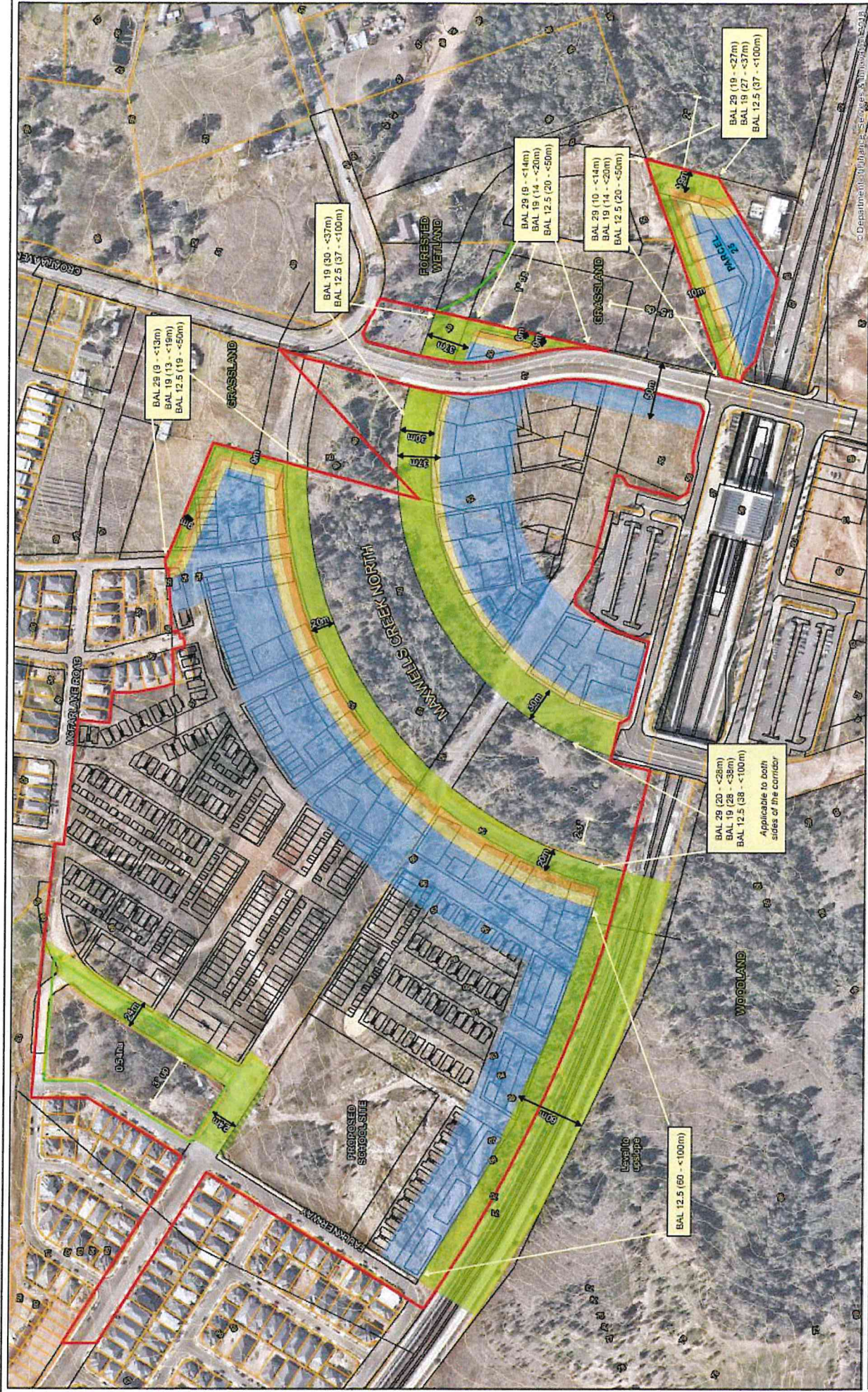
1. **Local Park**
Tree planting and landscaping
Bollard lighting
3m recreational path
Perimeter fencing / barriers
2. **Maxwell Creek North Riparian Corridor**
Tree planting and landscaping
Bollard lighting
3m recreational path
Perimeter fencing / barriers Civic park / playground / skate park facilities
3. **Regional Park**
Rehabilitate natural bushland
4. **District Park**
Retain grassed ground
3 x 100m x 100m sports fields
1 x 100m x 100m synthetic cricket pitch
Floodlighting to 100 lux
Male and female toilets
Amenities building and change rooms
Boardwalks / viewing platforms
Picnic and barbecue facilities
Children's playground (2-5 year-olds)
Sealed car park (10 cars)
Perimeter fencing / barriers



Campbelltown Local Government Area
Schedule of Open Space Facilities

5. **Mont St Quentin Oval**
AFL field
Synthetic cricket pitch
Amenities building and change rooms
Cafe/bar
Children's playground (2-5 year-olds)
Sealed car park (20 cars)
Picnet fence
Informal recreation
Perimeter fencing / bollards
6. **Local Park Stage 1**
Large adventure playground
Fitness circuit
Picnic and barbecue facilities
Amenities building and change rooms
Tree planting and landscaping
Bike and water rail
General and bollard lighting
7. **Local Park Adjacent School**
Children's playground (2-5 year-olds)
Perimeter fencing / barriers
Tree planting and landscaping
8. **Northern Riparian Corridor**
Perimeter fencing / barriers
9. **Maxwell Creek South Oval**
2 x International rugby league fields
Synthetic cricket pitch
Floodlighting to 100 lux
Male and female toilets
Amenities building and change rooms
Boardwalks / viewing platforms
Picnic and barbecue facilities
Children's playground (2-5 year-olds)
Sealed car park (20 cars)
Perimeter fencing / barriers
10. **Maxwell Creek South Water Quality Facility**
Detention basin and bio-retention systems
General and bollard lighting
Picnic and barbecue facilities
Tree planting and landscaping
Perimeter fencing / barriers
11. **Southern Riparian Corridor**
Tree planting and landscaping
Bollard lighting
3m recreational path
Perimeter fencing / barriers
12. **Local Park**
Bio-retention systems
Tree planting and landscaping
Bollard lighting
3m recreational path
Perimeter fencing / barriers





Legend

- Site boundary (source: CAD - 34.88ha)
- Contours - 1m (source: LIDAR)
- Edge of vegetation

Asset Protection Zone (APZ)

- APZ for residential development
- Minimum APZ for SFPP (School)

Bushfire Construction Standards

AS3388 (2009)*

- BAL 29
- BAL 19
- BAL 12.5

* Please refer to additional construction standards contained in Australian Appendix 3 of Planning for Bushfire Protection (2006)

Scale

1:3,000 @A3
GDA 1994 MGA Zone 56

Date

19/07/2018
Issue 1

Location

Edmondson Park
18LAND06_BF001

Title

Schedule 1 - Bushfire Protection Measures

Disclaimers: The mapping is a representation of available data and the location of features which may prove critical to assessing the viability of the proposed works. Mapping has been produced on a map base with an inherent level of uncertainty. The map is not a guarantee of accuracy and is not to be relied upon for a registered survey.

Assessment Map(s)



APZ Assessment Table

FDI	Assessor	Aspect	1 -Vegetation Formation As shown on Vegetation Formation layer in MapDesk	2 - Vegetation Formation As identified by applicant and confirmed in this assessment	Vegetation Classification As per AS3959-2009	Effective slope Under classified vegetation	Required APZ As per PBP Appendix 2	Separation distance / Proposed APZ	Complies? (with PBP Appendix 2)	Required BAL (where applicable)
100	Applicant	North		<<..>>	<<..>>	<<..>>			<<..>>	
	NSW RFS	North	Grassland	Grassland	Grassland	upslope/flat	10	9	Yes	<<..>>
			Forested Wetlands	Forested Wetlands	Forest	>0-5	20	30-37	Yes	
	Applicant	East		<<..>>	<<..>>	<<..>>			<<..>>	
	NSW RFS	East	Grassland	Grassland	Grassland	>0-5	10	9	Yes	<<..>>
			Woodland Grassy	Woodland Grassy	Woodland	>0-5	15	30	Yes	
	Applicant	South		<<..>>	<<..>>	<<..>>			<<..>>	
	NSW RFS	South	Woodland Grassy	Woodland Grassy	Woodland	>0-5	15	~60	Yes	<<..>>
			<<..>>	<<..>>	<<..>>	<<..>>			<<..>>	
	Applicant	West		<<..>>	<<..>>	<<..>>			<<..>>	
NSW RFS	West	Grassland	Grassland	Grassland	>0-5	10	9	Yes	<<..>>	
		Woodland Grassy	Woodland Grassy	Woodland	>0-5	15	30	Yes		
Where the assessed vegetation formation in 2 is different from the mapped formation in 1, detail what information the assessed formation is based on:										
_ N/A			_ Six Maps _ Other vegetation mapping		_ Site inspection X Aerial photography		_ Consultant's report _ Other			
Comments: The consultant has undertaken a deem to satisfy and alternate solution to determine the necessary setbacks to achieve compliance with PBP 2006 as well as ascertain the lowest BAL's for future construction. At this stage, the proposed setbacks can achieve the necessary separation distances as outlined within Table A2.4 of PBP 2006. It should also be noted there will be a remnant piece of vegetation to the north east of the school site in which the consultant states meets the requirements of being a low threat under AS3959-2009, but the RFS Fast Fact <i>Remnant Vegetation</i> begs to differ. A 24 metre setback is achievable, but a further setback of 6 to 14 metres maybe required if assessed under PBP 2006, with larger setbacks of greater than 38 metres required under PBP 2018.										



117 Directions

Direction:	Does the proposal comply with the direction?
<i>The planning proposal:</i>	
<i>Has regard for Planning for Bush Fire Protection 2006,</i>	Yes
<i>Introduces controls that avoid placing inappropriate developments in hazardous areas, and</i>	Yes
<i>Ensures that bushfire hazard reduction is not prohibited within the APZ.</i>	Yes
<i>Where development is proposed, the planning proposal complies with the following provisions, as appropriate:</i>	
<i>Provide an Asset Protection Zone (APZ) incorporating at a minimum:</i> <i>(i) An Inner Protection Area bounded by a perimeter road or reserve which circumscribes the hazard side of the land intended for development and has a building line consistent with the incorporation of an APZ, within the property, and</i> <i>An Outer Protection Area managed for hazard reduction and located on the bushland side of the perimeter road,</i>	Yes
<i>For infill development (that is development within an already subdivided area), where an appropriate APZ cannot be achieved, provide for an appropriate performance standard. If provisions of the planning proposal permit Special Fire Protection Purposes, the APZ provisions must be complied with,</i>	Yes
<i>Contain provisions for two-way access roads, which links to perimeter roads and/or to fire trail networks,</i>	Yes
<i>Contain provisions for adequate water supply for firefighting purposes,</i>	Yes
<i>Minimise the perimeter of the area of land interfacing the hazard which may be developed,</i>	Yes
<i>Introduce controls on the placement of combustible materials in the Inner Protection Area.</i>	Yes

Planning Principles for Rezoning to Residential in Bush Fire Prone Areas (Clause 2.3 of PBP)

Principle:	Does the proposal comply with the principles?
<i>The planning proposal:</i>	
<i>Provision of a perimeter road with two way access which delineates the extent of the intended development.</i>	Yes
<i>Provision, at the urban bushland interface, for the establishment of adequate asset protection zones for future housing.</i>	Yes
<i>Specifying minimum residential lot depths to accommodate asset protection zones for lots on perimeter roads.</i>	Yes
<i>Minimising the perimeter of the area of the land interfacing the hazard, which may be developed.</i>	Yes
<i>Introduction of controls which avoid placing inappropriate developments in hazardous areas.</i>	Yes
<i>Introduction of controls on the placement of combustible materials in asset protection zones.</i>	Yes