



NSW RURAL FIRE SERVICE



The General Manager
Warringah Council
Civic Centre, 725 Pittwater Road
DEE WHY NSW 2099

Your reference: PEX2013/0003
Our reference: LEP/0129
DA15020595664
ID:95664/90710/4

26 June 2015

Attention: Janelle Brooks

Dear Sir/Madam

Planning Proposal – Rezoning of land at Ralston Avenue, Belrose. Lot 1 DP 1139826

Reference is made to Council's letter dated 28 May 2015 and the additional information provided by the applicant in relation to the proposed rezoning. The NSW Rural Fire Service (RFS) provides the following additional comments.

The location of Asset Protection Zones (APZs) on slopes greater than 18 degrees is not supported in general and particularly for new developments where such situations can be easily avoided by good design in consideration of the constraints of the site.

The proposal to develop a Fuel Management Plan (FMP) to address the issue of APZs on steep slopes and the subsequent construction of dwellings is unsupported. The submission of a FMP at the development application stage to address these issues is considered too late in the process and is unacceptable.

The majority of the APZs required for the proposed layout will not be located within the individual residential lots created and will be located within the residual lot which will remain privately owned. The ongoing maintenance of the APZs will be borne by the land owner who does not benefit. Such an agreement is unusual given the extensive area required to be maintained as an APZ and considered unlikely to be maintained in perpetuity. The question becomes who would enforce a positive covenant and who would subsequently undertake the necessary maintenance works. Given the expertise required this is likely to fall to the NSW RFS creating an additional burden on existing resources.

The APZs are proposed to be located on land which is to be rezoned to E2 Environmental Conservation which may conflict with the objectives of the zone given the extent of the area to be managed.

The bushfire protection assessment report (dated August 2013) previously provided recommended:

- An additional 1 metre of APZ where slopes exceeded 18 degrees. The additional 1 metre APZ is considered inconsequential to compensate for the additional increase in slope.
- A 100 metre Strategic Fire Advantage Zone (SFAZ) around the periphery of the site. It is assumed this means the perimeter of the R2 Low Density Residential zoned land. The on-going management of the SFAZ is expected to fall to the NSW RFS creating an additional burden on existing resources.
- The recommendation to edge the SFAZ with a fire trail is considered unachievable given the terrain.
- The additional fire trails proposed will create an additional financial burden on the NSW RFS.

Postal address

NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

Street address

NSW Rural Fire Service
Customer Service Centre East
42 Lamb Street
GLENDENNING NSW 2761

T 1300 NSW RFS
www.rfs.nsw.gov.au



- The management of the APZ within the SFAZ is likely to be problematic in terms of defining the boundaries of each zone. APZs cannot be located within a SFAZ as APZs are usually maintained by mechanical means and SFAZs by prescribed burning. Mechanical works are not permitted in a SFAZ.

The RFS will not support the proposed rezoning of this site where it relies so heavily upon an alternate solution to meet the aims and objectives of *Planning for Bush Fire Protection 2006* and which will likely create additional burdens on the existing resources of the NSW RFS to ensure the safety of the residents.

For any enquires regarding this correspondence please contact Garth Bladwell on 1300 NSW RFS.

Yours sincerely



Iona Cameron
A/Team Leader
Development Assessment and Planning
Customer Service Centre East