

Allen Price & Scarratts Pty Limited
PO Box 73
NOWRA NSW 2541
Attention: Rebecca Lockart

Our reference: 24HUS7935

15 July 2024

Dear Rebecca,

RE: Addendum to Bushfire Protection Assessment – West Culburra Concept Proposal (SSD 3846)

This letter is an addendum to the Bushfire Protection Assessment (BPA) prepared by Eco Logical Australia (ELA) 12 October 2020 (19HNG_14878 version 6 in Appendix A) to support a Modification Application. The addendum specifically addresses the following changes:

1. Adjustment to the western boundary of the Residential Precinct which is required as a result of required basins. This also impacts the 'siting' of the Industrial Precinct;
2. Minor reconfigurations to the internal lot layout within the Residential Precinct;
3. Minor adjustment to the 'emergency use (only) fire trail'; and
4. Staging.

No adjustments have been made to the Town Centre Precinct. A comparison plan showing the adjustments in the approved and modified concept is provided in Figure 1.

Whilst the western site boundary within the proposed development has been adjusted, all bushfire protection measures assessed within the original BPA remain unchanged i.e. Asset Protection Zones (APZ) widths, perimeter and non-perimeter access and utilities, there is no change to the bushfire risk or exposure to the site. All bushfire protection measures are in accordance with Conditions of Consent (B27 to B28) issued by Land and Environment Court 1 December 2021 (LEC No: 2019/78149; SSD 3846).

The modification seeks to delete Condition B27 and B28 of the Consent issued by Land and Environment Court (LEC No: 2019/78149; SSD 3846) and modify Condition C28 to state:

BUSHFIRE PROTECTION

C28. Future DAs for each stage of the Concept Proposal must comply with:

- (a) the relevant provisions of Planning for Bushfire Protection 2019;
- (b) the asset protection zone requirements recommended in the Bushfire Protection Assessment:
Proposed Mixed-use Concept Plan – Culburra Road, West Culburra, prepared by EcoLogical

Australia and dated 12 October 2020, ***as amended by the Addendum to Bushfire Assessment prepared by Ecological Australia dated 10 July 2024;***

- (c) AS2419.1 – 2005 Fire Hydrant Installations for firefighting water supply; and
- (d) ***Asset protection zones for the Concept Proposal must be located outside of retained foreshore and woodland reserves.***

Asset Protection Zones

The bushfire hazard assessment previously assessed (Figure 2) remains unchanged and as shown in Figure 3, the adjusted concept design can accommodate the required residential APZ (29 kW/m²) within the perimeter road carriageway and future building setbacks.

Vehicular Access

Perimeter roads are provided between the bushfire hazard and future lots and alternate egress is provided via an 'emergency use (only) fire trail' connecting the western precinct with a proposed road within the industrial estate. This is a minor adjustment to the original approved concept where the 'emergency use (only) fire trail' connected the western precinct to Strathstone Street further east. This adjustment does not increase the bushfire risk and ELA considers this amendment as a design improvement as the emergency route is shorter, traverses less bushfire hazard and connects with a public road within the Industrial Precinct (refer Figure 3).

Staging

Whilst the staging plan has been adjusted since the previous approval, the temporary bushfire protection measures identified in the BPA (ELA 19HNG_14878 version 6) will be implemented:

Residential (Western Precinct)

- Seven (7) stages developed progressively westward;
 - Temporary perimeter roads as shown in Figure 4 to Figure 10;
 - APZ are to be provided between progressing development perimeter and the bushfire hazard. These APZ are to be wide enough to ensure the adjoining allotments are able to be built upon to the standard anticipated under PBP when the total subdivision is complete. This may be up to 100 m wide in some instances as shown in Figure 4 to Figure 10.
- The emergency bushfire egress to the south-east is required to be constructed in Stage 1 (Figure 4).

Industrial Precinct

- Two (2) stages developed progressively southward;
- All road infrastructure and APZ to be implemented at Stage 1 as shown in Figure 11 to Figure 12.

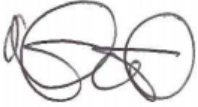
Town Centre Precinct

- Three (3) stages developed progressively southward as shown in Figure 13 to Figure 15;
- Entry road/roundabout construction only at Stage 1 (Figure 13);
- Implementation of permanent APZ at Stage 2 along with northern lots and perimeter road (Figure 14).

Conclusion

Based on the information above, ELA request the adjusted concept be approved on the basis there is no increased bushfire risk or exposure to the site, there are no changes to the bushfire protection measures and the bushfire specific conditions issued by Land and Environment Court 1 December 2021 (LEC No: 2019/78149; SSD 3846) are still applicable.

Yours sincerely,



Natalie South
Bushfire Consultant
FPAA BPAD Accredited Practitioner No. BPAD41212-L2



Bruce Horkings
Principal Bushfire Consultant and Technical Lead
FPAA BPAD Accredited Practitioner No. BPAD29962-L3



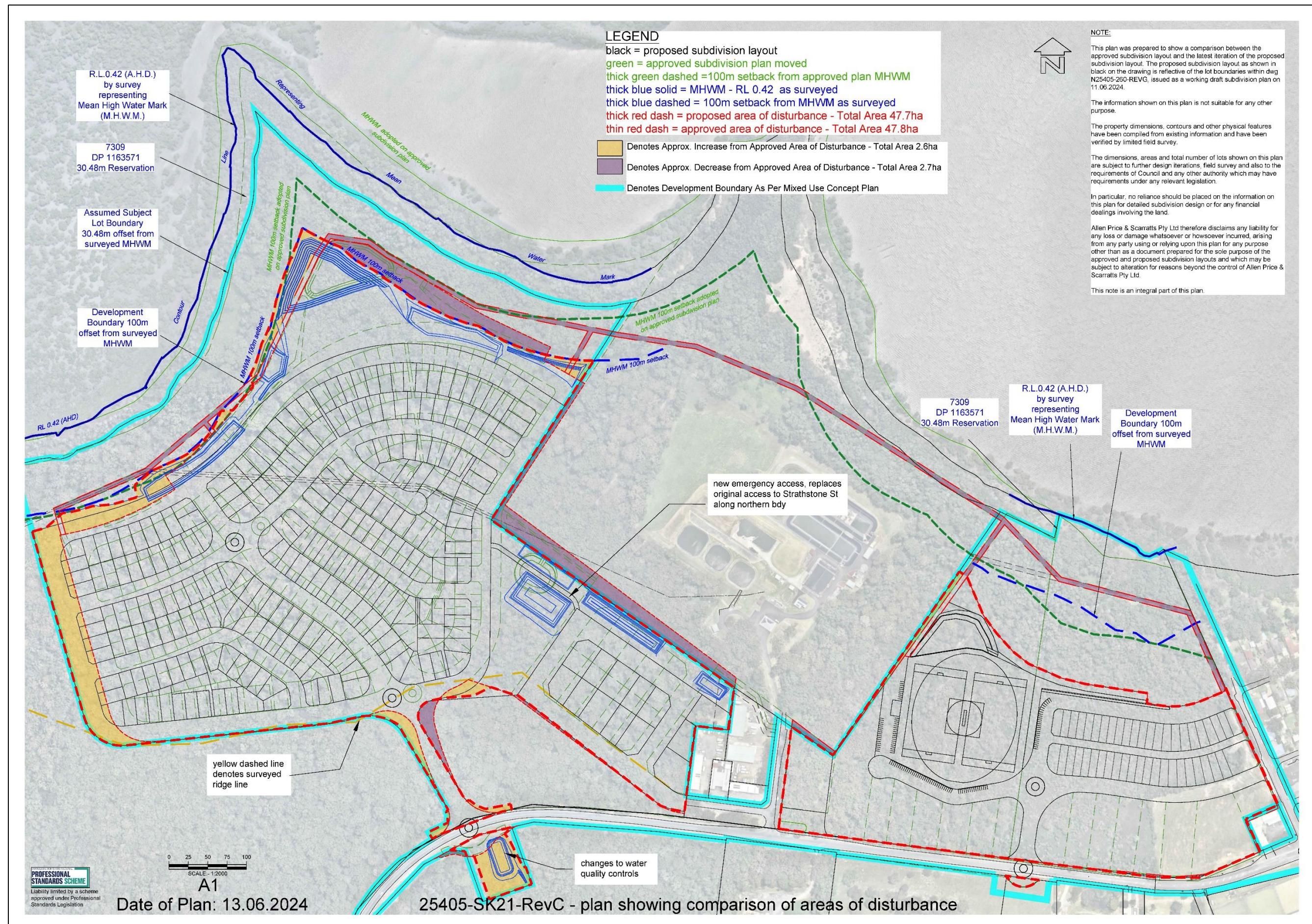


Figure 1: Comparison Plan

Bushfire Hazard Assessment

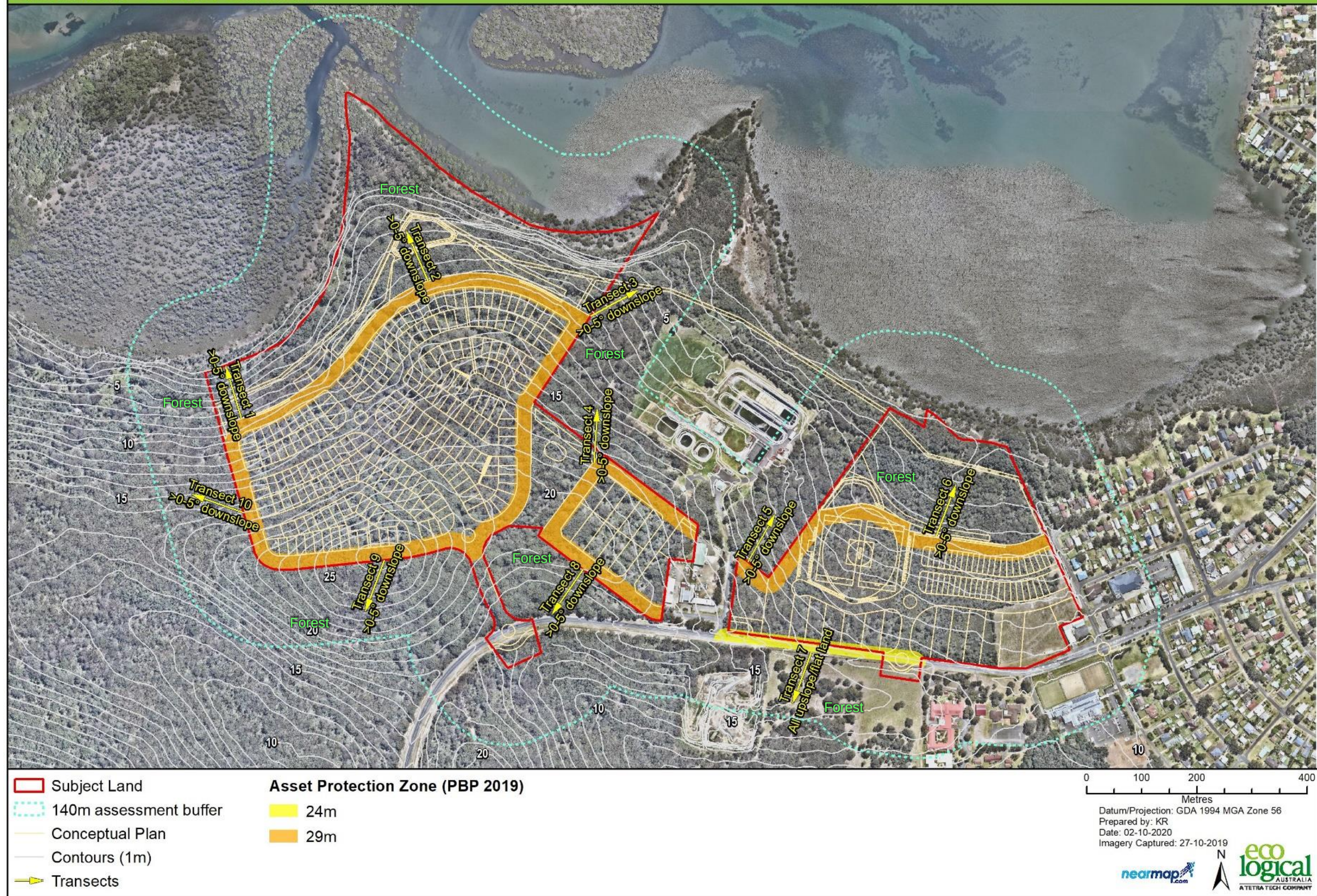


Figure 2: Previous Bushfire Hazard Assessment (ELA 2020)

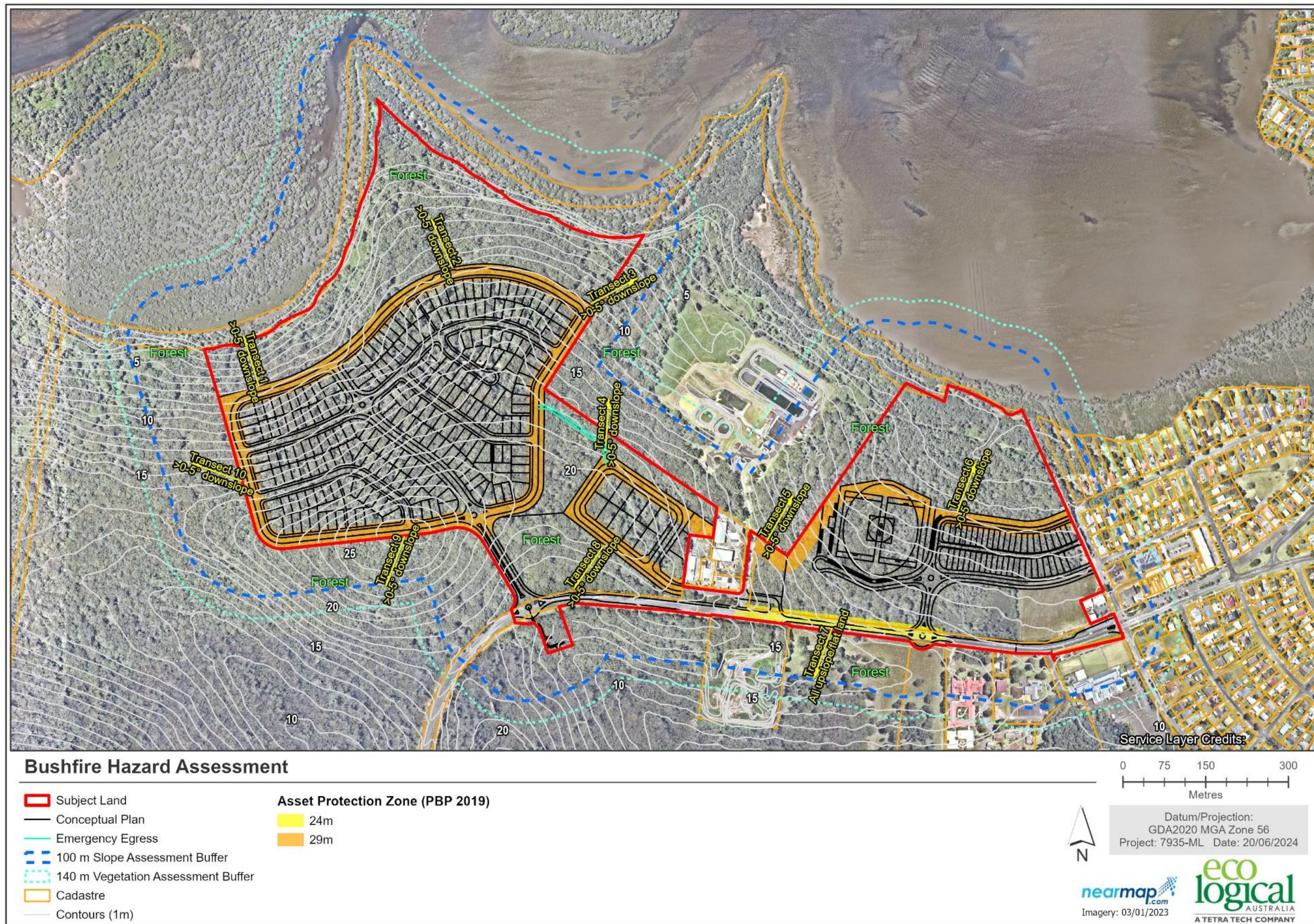


Figure 3: Bushfire Hazard Assessment of Modified Concept

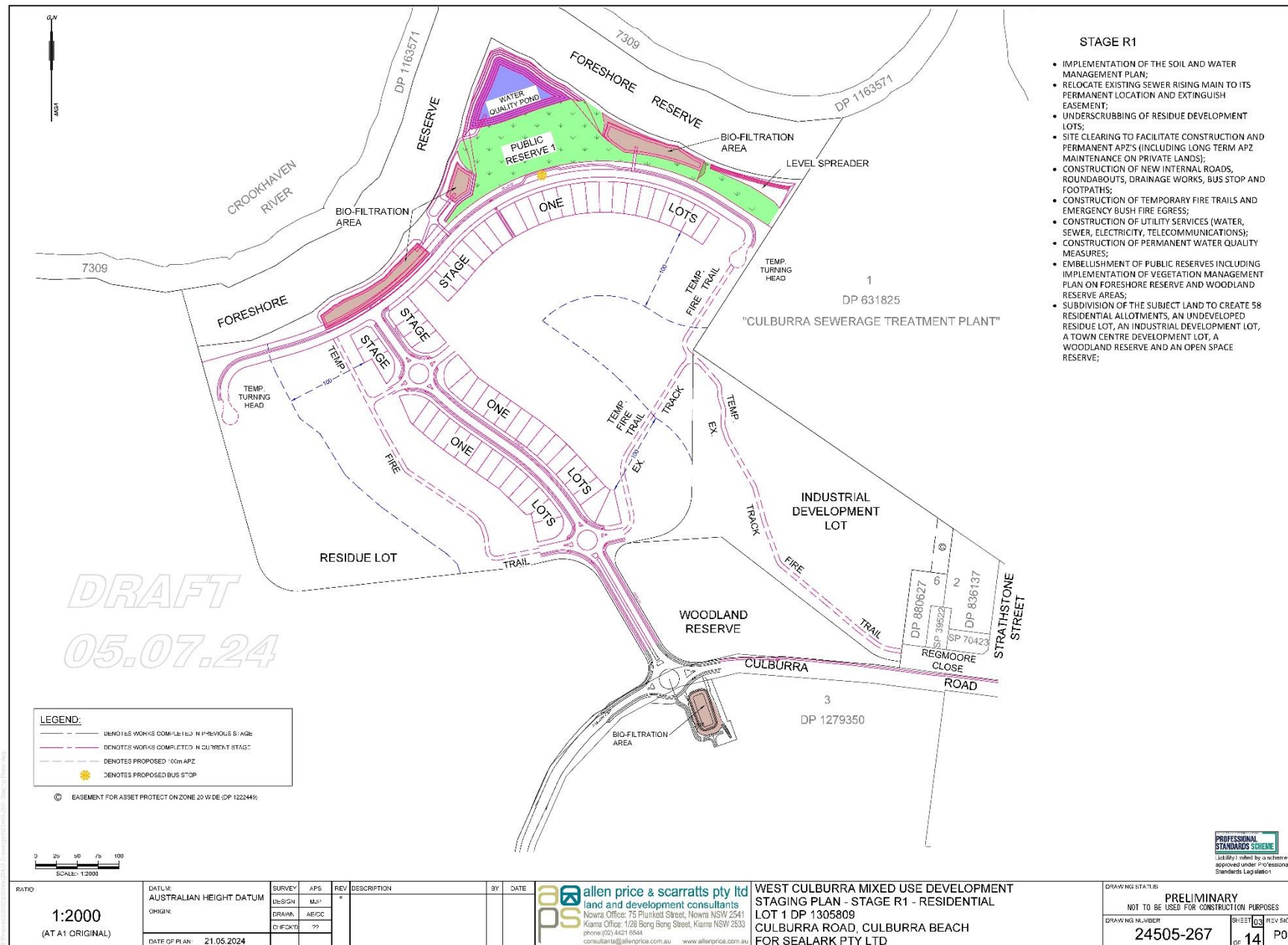


Figure 4: Residential Precinct Stage 1

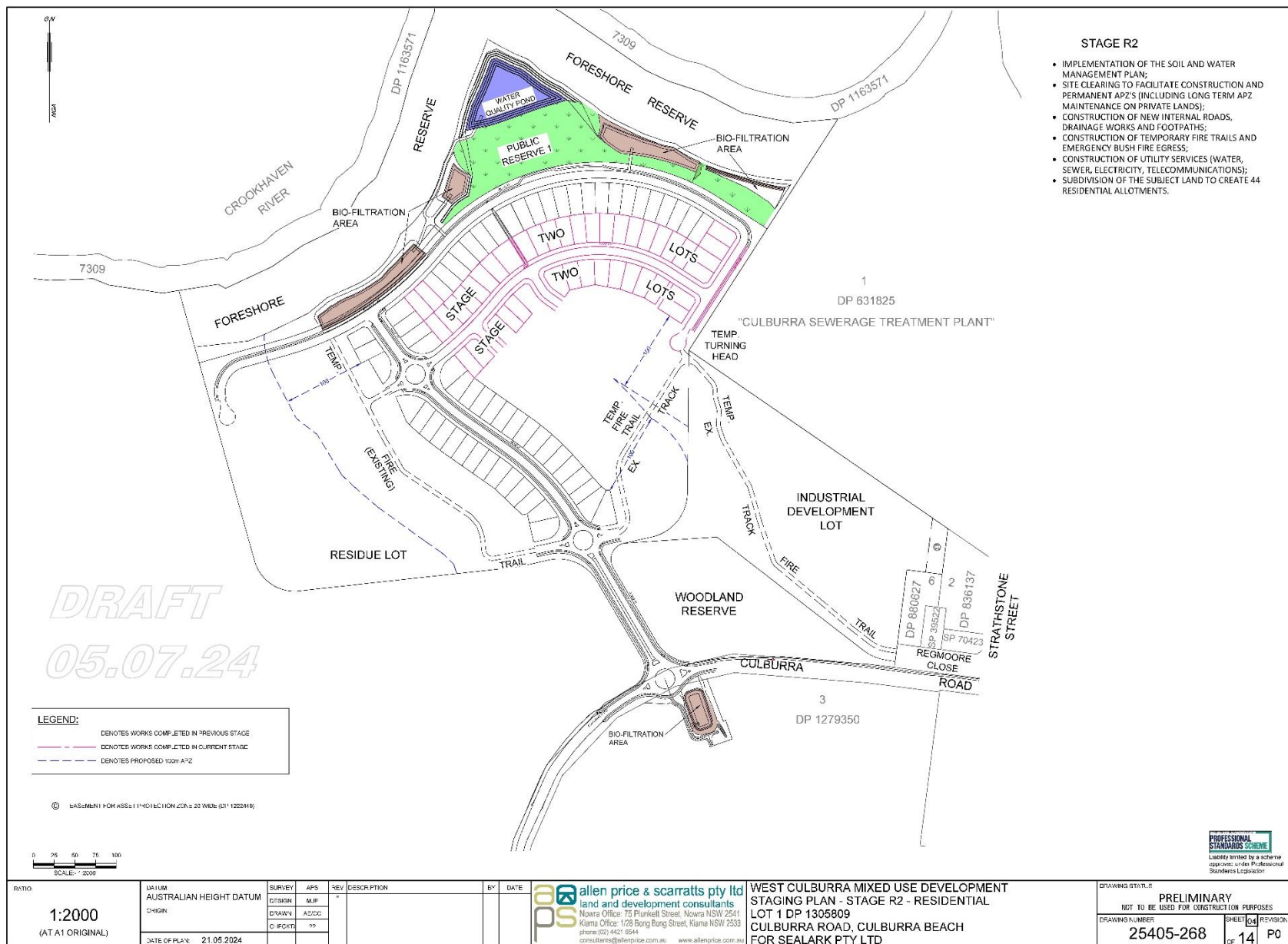


Figure 5: Residential Precinct Stage 2

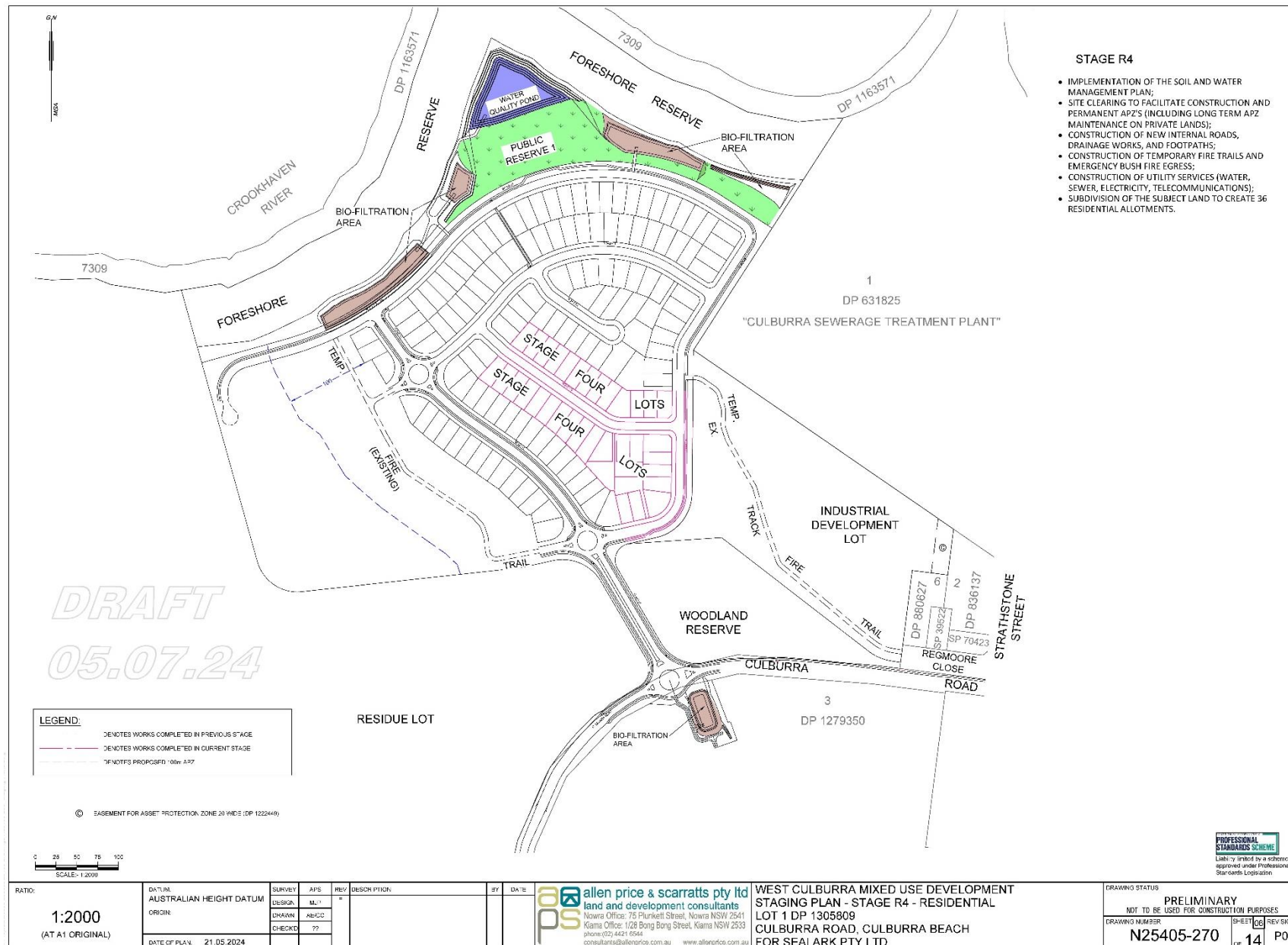


Figure 6: Residential Precinct Stage 3

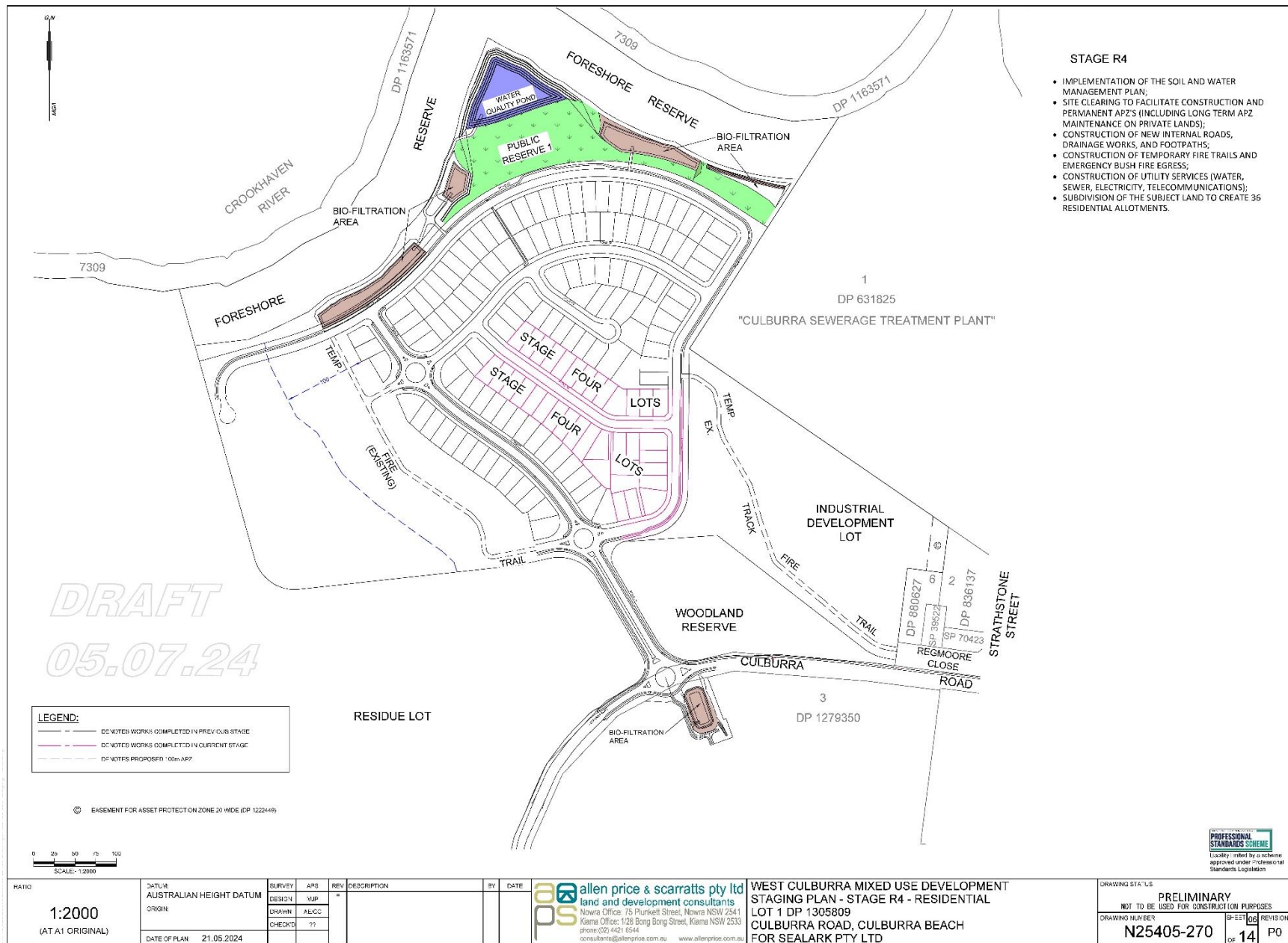


Figure 7: Residential Precinct Stage 4

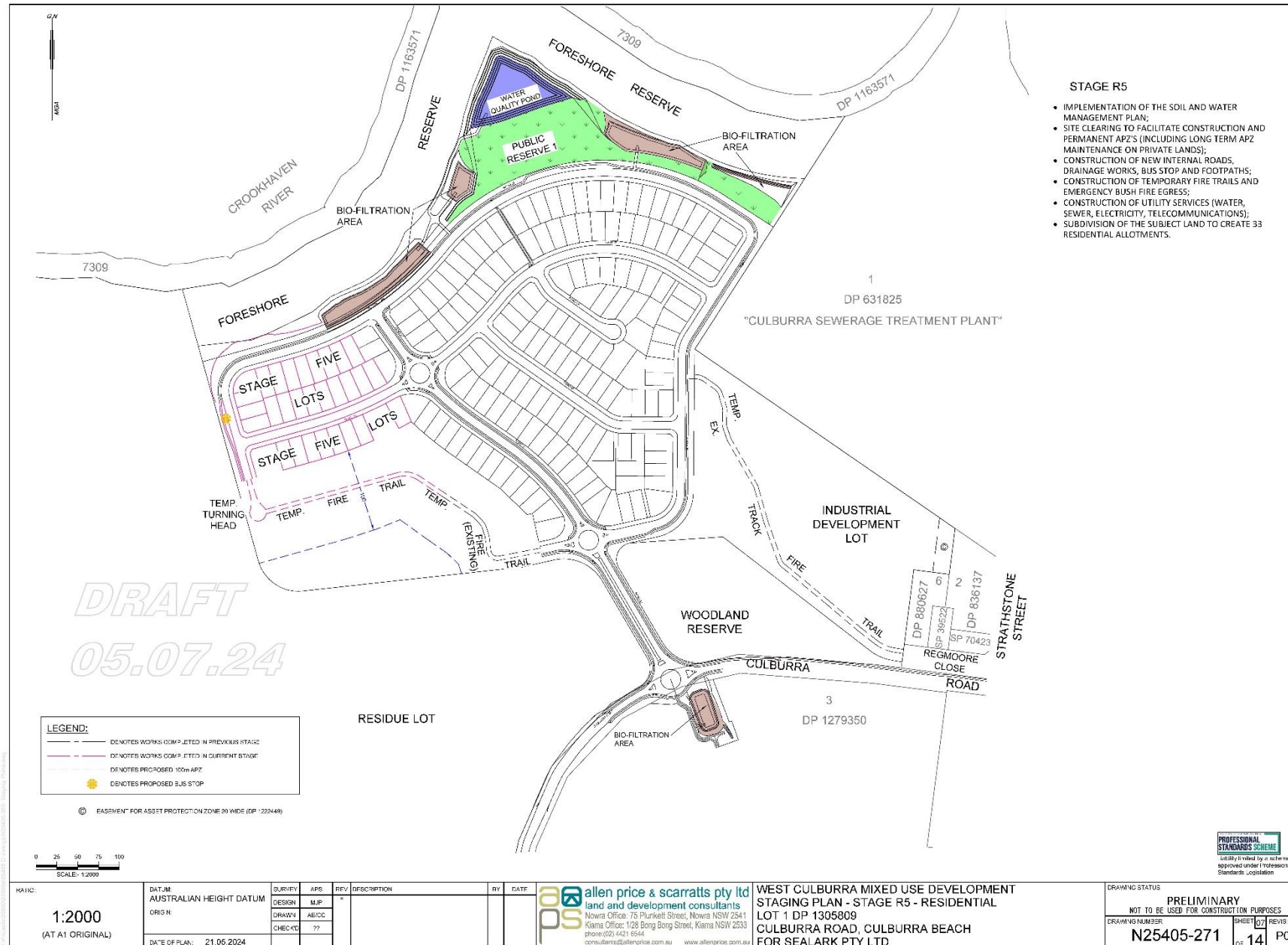
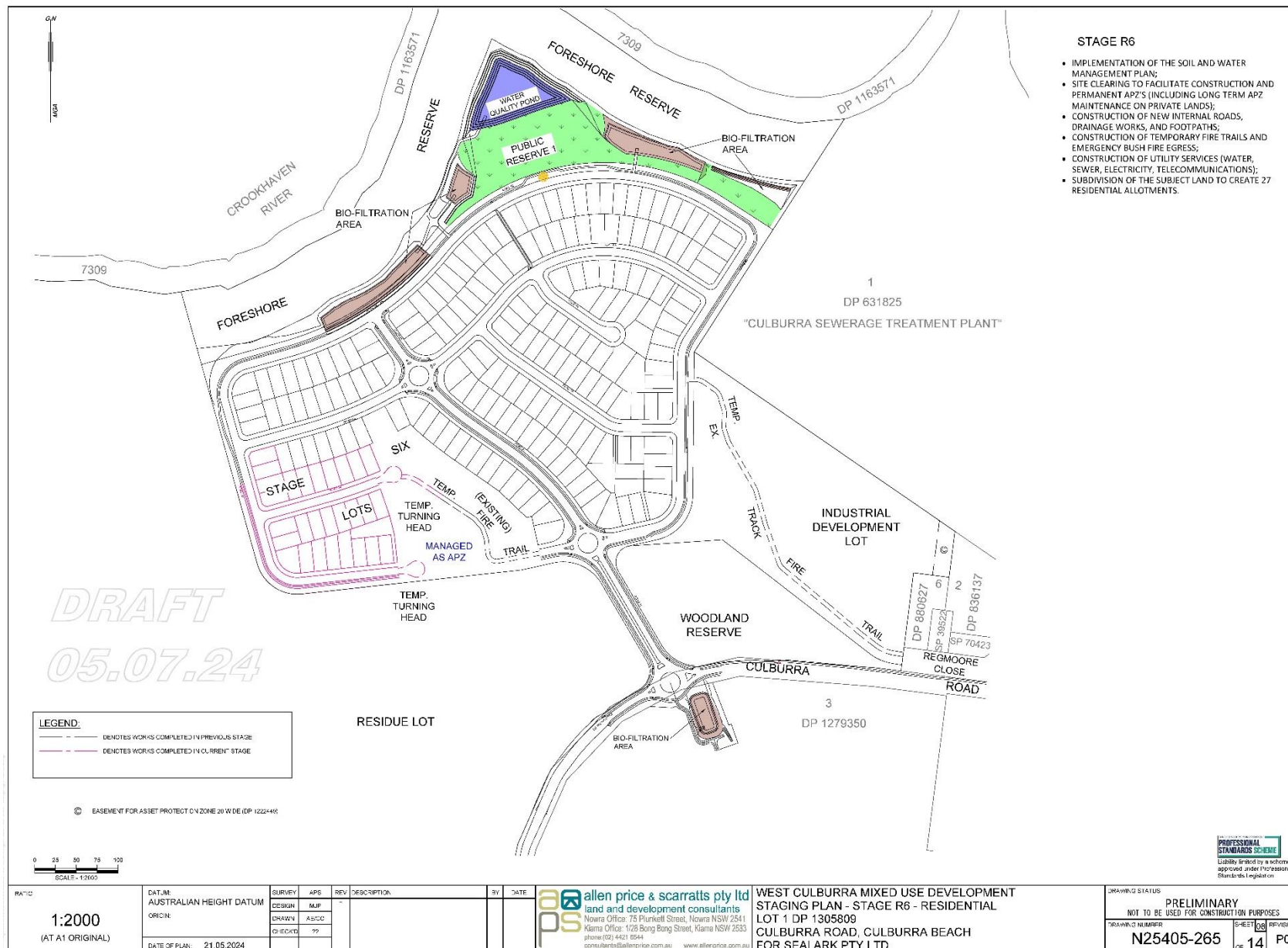


Figure 8: Residential Precinct Stage 5



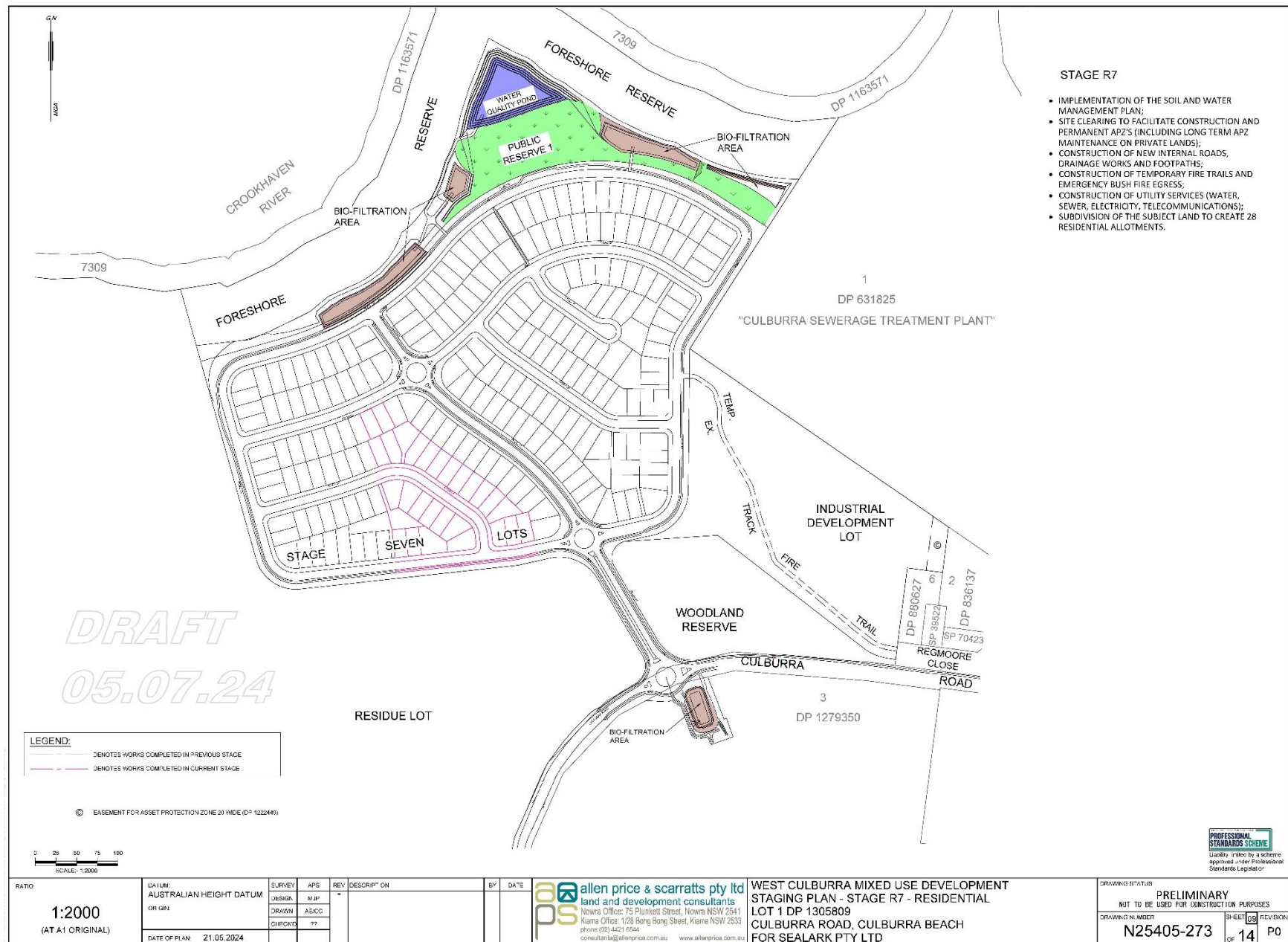


Figure 10: Residential Precinct Stage 7



Figure 11: Industrial Precinct Stage 1



Figure 12: Industrial Precinct Stage 2

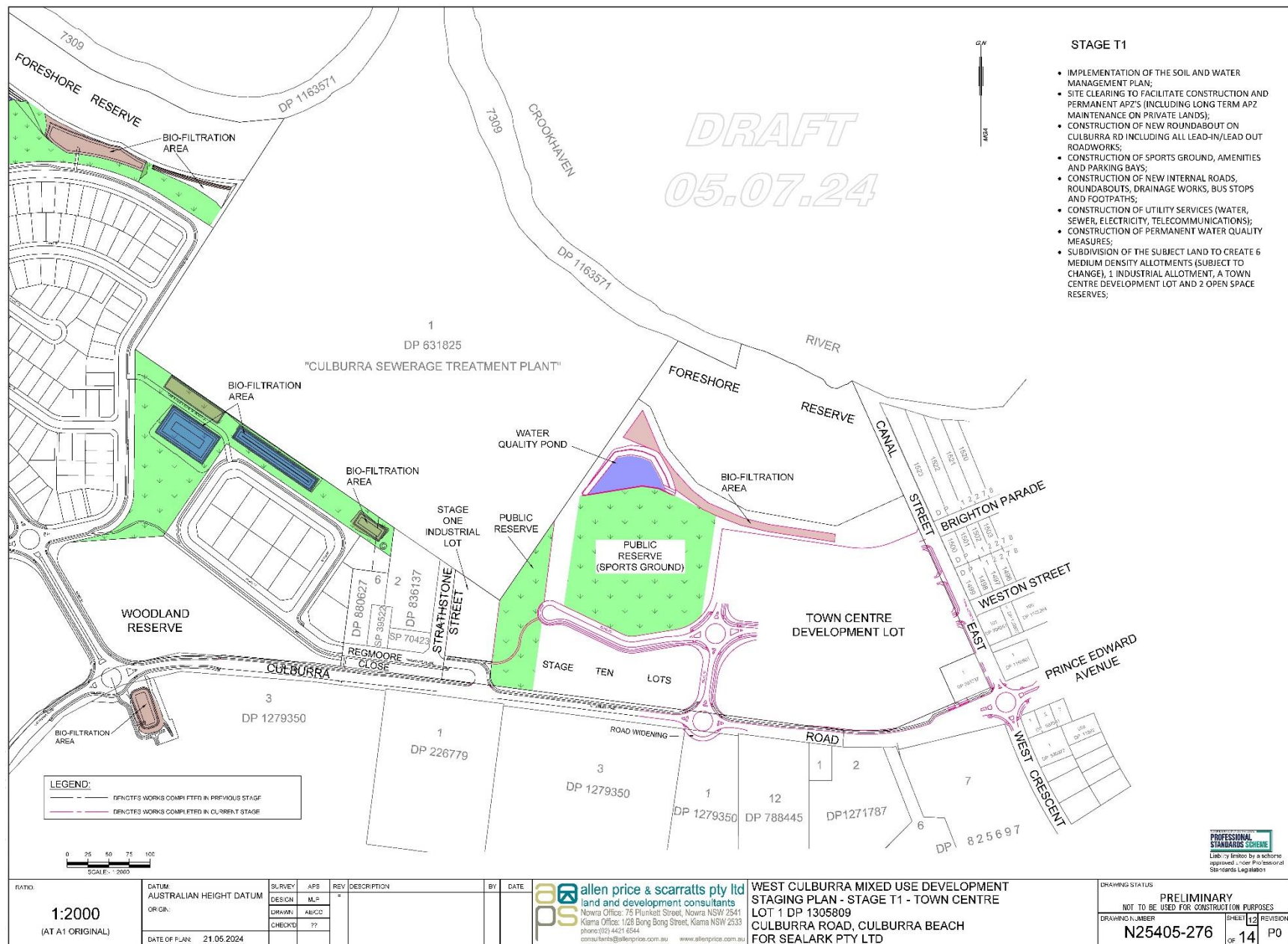


Figure 13: Town Centre Precinct Stage 1

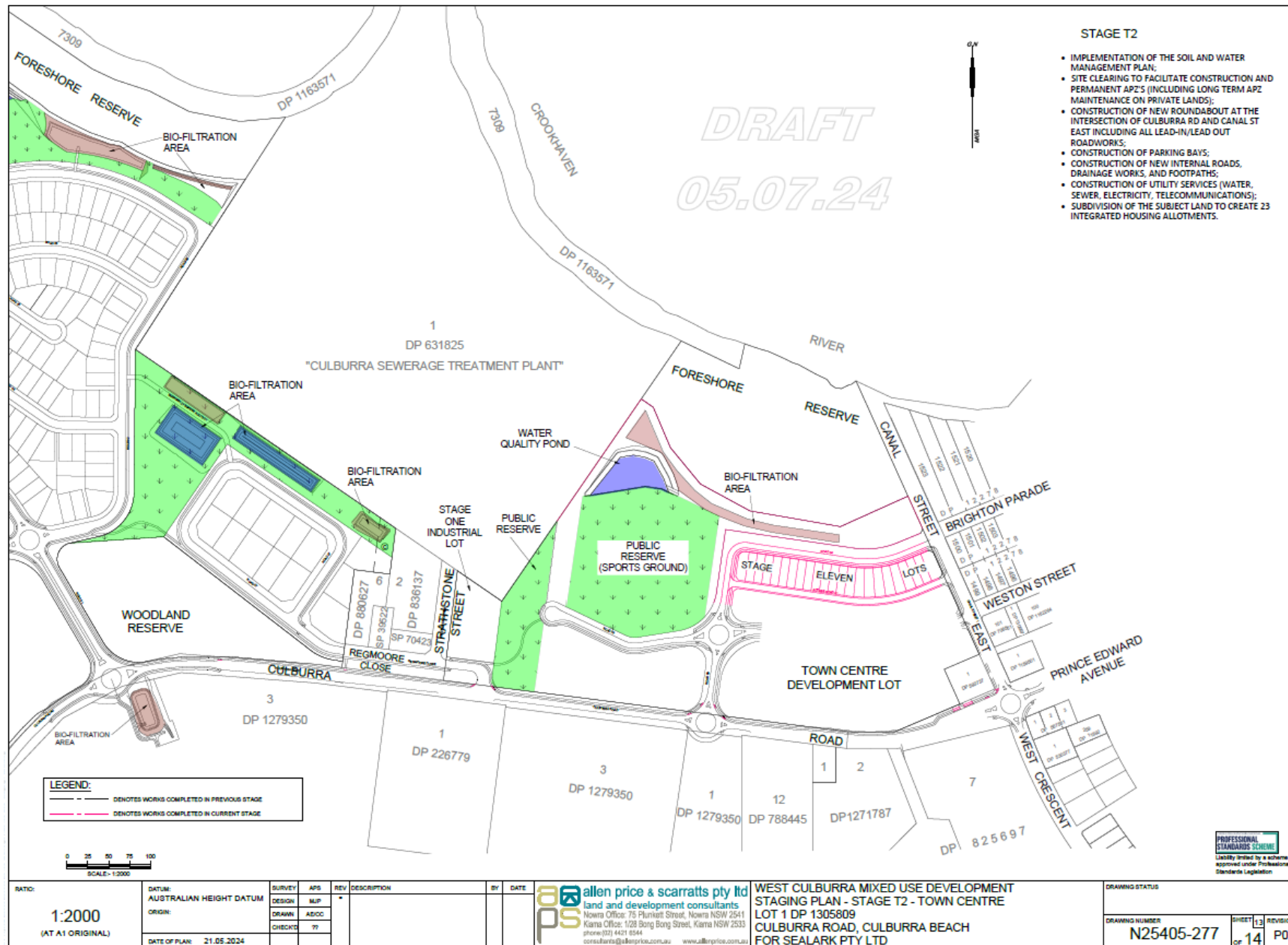


Figure 14: Town Centre Precinct Stage 2

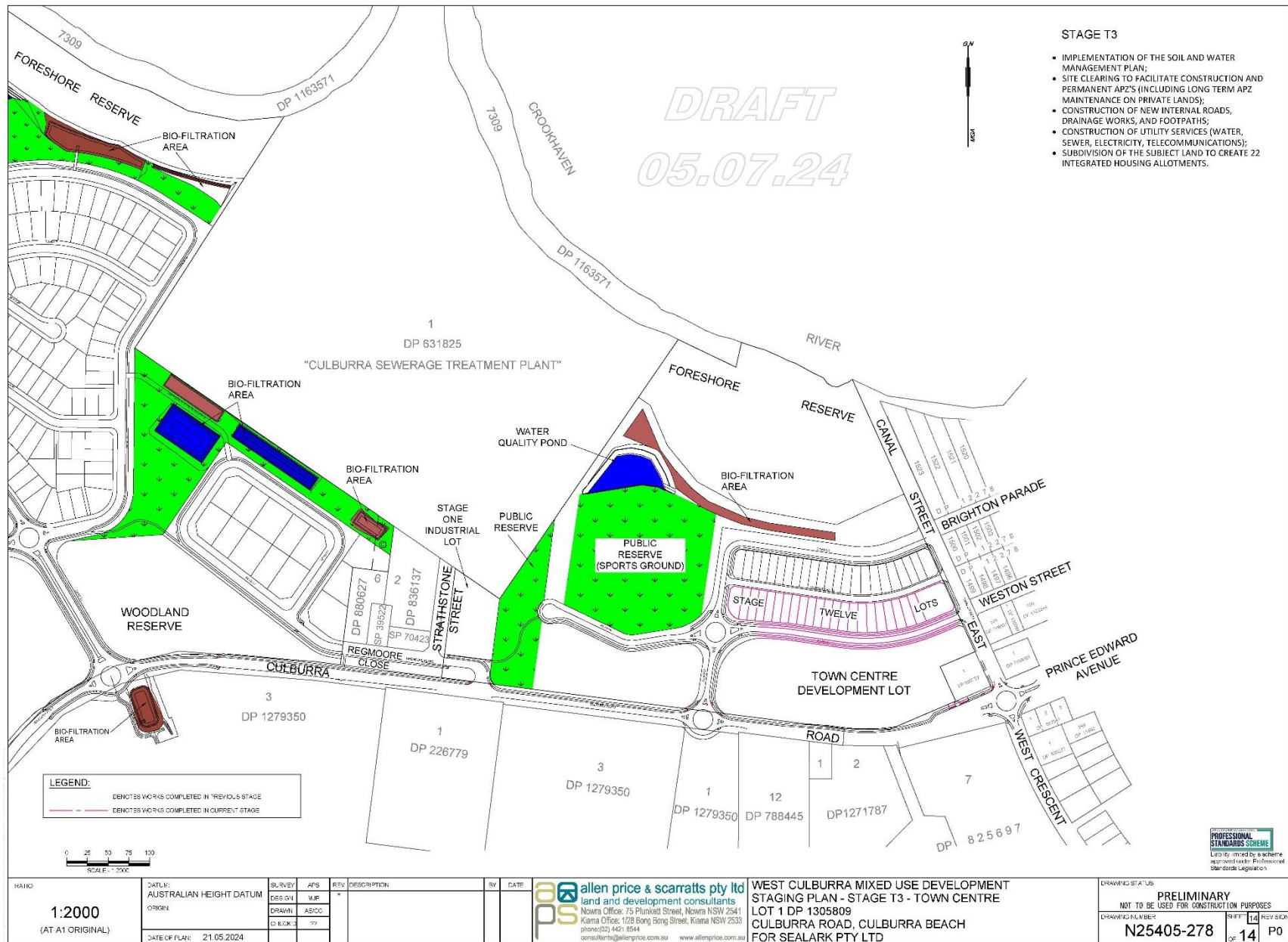


Figure 15: Town Centre Precinct Stage 3

Appendix A – Bushfire Protection Assessment (ELA 2020)