



## NSW RURAL FIRE SERVICE

Department of Planning and Environment (Parramatta)  
Locked Bag 5022,  
PARRAMATTA NSW 2124  
Australia

Your reference: SSD-41306367

Our reference: DA20221111011703-Original-1

**ATTENTION:** Teresa Gizzi

Date: Friday 6 January 2023

Dear Sir/Madam,

### Development Application

### Other - Other Assessment - Educational Establishment

**Gregory Hills Primary School 28 Wallarah Circuit Gregory Hills NSW 2557, 3257//DP1243285**

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 08/11/2022.

The NSW RFS has reviewed the documentation related to the construction of new primary school on the subject site, and supports the proposal subject to the following conditions:

### Asset Protection Zones

***The intent of measures is to provide suitable building design, construction and sufficient space to ensure that radiant heat levels do not exceed critical limits for firefighters and other emergency services personnel undertaking operations, including supporting or evacuating occupants. To achieve this, the following conditions shall apply:***

1. From the start of building works, and in perpetuity to ensure ongoing protection from the impact of bush fires, the property around the proposed school buildings on the western aspect must be managed as shown in Figure 12 of the Bush Fire Report (Ref: J2809, Version 1.7, dated 28 October 2022, prepared by BlackAsh Bush fire Consulting):

- An inner protection area (IPA) for a distance of 26 metres; and,
- An outer protection area (OPA) for a further distance of 25 metres.

When establishing and maintaining an IPA the following requirements apply in accordance with the requirements of Appendix 4 of *Planning for Bush Fire Protection 2019*:

- tree canopy cover should be less than 15% at maturity;
- trees at maturity should not touch or overhang the building;
- lower limbs should be removed up to a height of 2 metres above the ground;
- tree canopies should be separated by 2 to 5 metres;
- preference should be given to smooth barked and evergreen trees;
- create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings should be provided;
- shrubs should not be located under trees;

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- shrubs should not form more than 10% ground cover; and
- clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.
- grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and
- leaves and vegetation debris should be removed.

When establishing and maintaining an OPA the following requirements apply in accordance with the requirements of Appendix 4 of *Planning for Bush Fire Protection 2019*:

- trees tree canopy cover should be less than 30%;
- canopies should be separated by 2 to 5 metres.
- shrubs should not form a continuous canopy;
- shrubs should form no more than 20% of ground cover;
- grass should be kept mown to a height of less than 100mm; and
- leaf and other debris should be removed.

### **Construction Standards**

***The intent of measures is to provide suitable building design, construction and sufficient space to ensure that radiant heat levels do not exceed critical limits for firefighters and other emergency services personnel undertaking operations, including supporting or evacuating occupants. To achieve this, the following conditions shall apply:***

2. New construction of the proposed school building consisting of stores, offices, canteen and communal space areas must comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2018 *Construction of buildings in bush fire-prone areas* or NASH Standard (1.7.14 updated) *National Standard Steel Framed Construction in Bushfire Areas – 2014* as appropriate and Section 7.5 of *Planning for Bush Fire Protection 2019*.

### **Water and Utility Services**

***The intent of measures is to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building. To achieve this, the following conditions shall apply:***

3. The provision of water, electricity and gas must comply with the following in accordance with Table 6.8c of *Planning for Bush Fire Protection 2019*:

- reticulated water is to be provided to the development where available;
- fire hydrant, spacing, design and sizing complies with the relevant clauses of Australian Standard AS 2419.1:2005;
- hydrants are not located within any road carriageway;
- reticulated water supply to urban subdivisions uses a ring main system for areas with perimeter roads;
- fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2005;
- all above-ground water service pipes are metal, including and up to any taps;
- where practicable, electrical transmission lines are underground;
- where overhead, electrical transmission lines are proposed as follows:
  - (a) lines are installed with short pole spacing (30 metres), unless crossing gullies, gorges or riparian areas; and
  - (b) no part of a tree is closer to a power line than the distance set out in accordance with the specifications in *ISSC3 Guideline for Managing Vegetation Near Power Lines*.
- reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 - *The storage and handling of LP Gas*, the requirements of relevant authorities, and metal piping is used;
- all fixed gas cylinders are kept clear of all flammable materials to a distance of 10 metres and shielded on the hazard side;
- connections to and from gas cylinders are metal; polymer-sheathed flexible gas supply lines are not used; and
- above-ground gas service pipes are metal, including and up to any outlets.

### **Landscaping**

***The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting fire fighting activities. To achieve this, the following conditions shall apply:***

4. Landscaping within the required asset protection zone must comply with Appendix 4 of *Planning for Bush Fire Protection 2019*. In this regard, the following principles are to be incorporated:

- A minimum 1 metre wide area (or to the property boundary where the setbacks are less than 1 metre), suitable for pedestrian traffic, must be provided around the immediate curtilage of the building;
- Planting is limited in the immediate vicinity of the building;
- Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters);
- Landscape species are chosen to ensure tree canopy cover is less than 15% (IPA), and less than 30% (OPA) at maturity and trees do not touch or overhang buildings;
- Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies;
- Use smooth bark species of trees species which generally do not carry a fire up the bark into the crown;
- Avoid planting of deciduous species that may increase fuel at surface/ ground level (i.e. leaf litter);
- Avoid climbing species to walls and pergolas;
- Locate combustible materials such as woodchips/mulch, flammable fuel stores away from the building;
- Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from the building; and
- Low flammability vegetation species are used.

#### **Emergency and Evacuation**

***The intent of measures is to provide suitable emergency and evacuation arrangements for occupants of SFPP developments. To achieve this, the following conditions shall apply:***

5. Bush Fire Emergency Management and Evacuation Plan is prepared consistent with the:

- The NSW RFS document: *A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan*; and,
- NSW RFS Schools Program Guide and/or Australian Standard AS 3745:2010 *Planning for emergencies in facilities*.

The Bush Fire Emergency Management and Evacuation Plan must include planning for the early relocation of occupants.

Note: A copy of the Bush Fire Emergency Management and Evacuation Plan should be provided to the Local Emergency Management Committee for its information prior to occupation of the development. An Emergency Planning Committee needs to be established to consult with residents (and their families in the case of aged care accommodation and schools) and staff in developing and implementing an Emergency Procedures Manual. Detailed plans of all emergency assembly areas including on-site and off-site arrangements as stated in AS 3745:2010 are to be clearly displayed, and an annual emergency evacuation exercise is to be conducted.

For any queries regarding this correspondence, please contact Rohini Belapurkar on 1300 NSW RFS.

Yours sincerely,

Alastair Patton  
**Supervisor Development Assessment & Plan  
Built & Natural Environment**