



NSW RURAL FIRE SERVICE

Department of Planning and Environment (Sydney Offices)
GPO Box 39
Sydney NSW 2001

Your reference: SSD-10457
Our reference: DA20210215000597-SEARS-1

ATTENTION: Emily Dickson

Date: Friday 5 March 2021

Dear Sir/Madam,

State Significant Development – Commercial Premises
Request for comments – exhibited Environmental Impact Statement (EIS)
Eastern Creek Retail Centre - SSD-10457 Rooty Hill Road South Eastern Creek NSW 2766, 1//DP1267436

Reference is made to correspondence dated 11/02/2021 seeking comments regarding the Environmental Impact Statement (EIS) currently being exhibited, for the above State Significant Development in accordance with the *Environmental Planning and Assessment Act 1979*.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the EIS and provides the following comments;

Asset Protection Zones

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents/occupants and others assisting firefighting activities.

1. From the start of building works and in perpetuity, Lot 3 must be entirely managed to the standards of an inner protection area (IPA) in accordance with the requirements of Appendix 4 of *Planning for Bush Fire Protection 2019*. When establishing and maintaining an IPA, the following standards apply:

- Tree canopy cover be less than 15% at maturity;
- Trees at maturity are not touching or overhang the building;
- Lower limbs are removed up to a height of 2m above the ground;
- Tree canopies are separated by 2 to 5m;
- Preference is given to smooth-barked and evergreen trees;
- Large discontinuities or gaps in vegetation are provided to slow down or break the progress of fire towards buildings;
- Shrubs are not located under trees;
- Shrubs do not form more than 10% of ground cover;
- Clumps of shrubs are separated from exposed windows and doors by a distance of at least twice the height of the vegetation.
- Grass to be kept mown (as a guide grass should be kept to no more than 100mm in height);
- Leaves and vegetation debris are removed; and
- NSW Rural Fire Service's document *Standards for asset protection zones*.

Postal address

NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

Street address

NSW Rural Fire Service
4 Murray Rose Ave
SYDNEY OLYMPIC PARK NSW 2127

T (02) 8741 5555
F (02) 8741 5550
www.rfs.nsw.gov.au

2. Landscaping within Lot 3 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, 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% 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 spread 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.

Construction Standards

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents/occupants and others assisting firefighting activities.

3. New construction (except for the western elevation/s) must comply with Sections 3 and 8 (BAL 40) 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*.

4. New construction on the western elevation/s must comply with section 3 and section 7 (BAL 29) 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*.

5. Any new Class 10b structures as defined per the *National Construction Code* must be non-combustible.

Access Requirements

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents/occupants and others assisting firefighting activities.

6. Church Street must comply with the following provisions for perimeter roads under Table 5.3b of *Planning for Bush Fire Protection 2019*:

- two-way sealed roads;
- minimum 8m carriageway width kerb to kerb;
- parking is provided outside of the carriageway width;
- incorporate a minimum 12-meter outer radius turning circle, and are clearly posted as a dead-end;
- the capacity of road surfaces and any bridges/causeways is sufficient to carry loaded firefighting vehicles (up to 23 tonnes);
- hydrants are located clear of parking areas;
- curves of roads have a minimum inner radius of 6m;
- the maximum grade road is 15 degrees and an average grade of not more than 10 degrees;
- the road crossfall does not exceed 3 degrees; and
- a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided;
- hydrants are provided in accordance with the relevant clauses of AS 2419.1:2005 - *Fire hydrant installations System design, installations and commissioning*.

7. The perimeter access along the entire length of the eastern property boundary, interfacing the bush fire hazard, must comply with the following standards for non-perimeter roads under Table 5.3b of *Planning for Bush Fire Protection 2019*:

- minimum of 5.5m carriageway width kerb to kerb;
- parking is provided outside of the carriageway width;
- hydrants are located clear of parking areas;
- made a through road by linking Church Street and Goldsbro Glade;
- provide suitable finish levels to allow for casual access within bush fire hazards to extinguish fires;
- the capacity of road surfaces and any bridges/causeways is sufficient to carry loaded firefighting vehicles (up to 23 tonnes);
- parking areas do not obstruct hydrants;
- curves of roads have a minimum inner radius of 6m;
- the maximum grade road is 15 degrees and an average grade of not more than 10 degrees;
- the road crossfall does not exceed 3 degrees;
- a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided; and
- hydrants are provided in accordance with the relevant clauses of AS 2419.1:2005 - *Fire hydrant installations System design, installations and commissioning*.

Water and Utility Services

Intent of measures: to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents/occupants and others assisting firefighting activities.

8. The provision of water, electricity and gas must comply with Table 7.4a of *Planning for Bush Fire Protection 2019*.

For any queries regarding this correspondence, please contact Simon Derevnin on 1300 NSW RFS.

Yours sincerely,

Kalpana Varghese

**Team Leader, Dev. Assessment & Planning
Planning and Environment Services**