

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

Sydney NSW 2001 Your reference: SSD-9813

Our reference: DA20191210001395-Original-1

ATTENTION: Louise Starkey Date: Friday 3 January 2020

Dear Sir/Madam,

Development Application
State Significant - EIS & DA Exhibition - Residential Flat Building
Donnison St Gosford NSW 2250 AUS, (none)

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 10/12/2019.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the Environmental Impact Statement (EIS) currently being exhibited for the above State Significant Development in accordance with the Environmental Planning and Assessment Act 1979, and provides the following comments:

## **APZ Conditions**

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:

- **1.** From the start of building works, the property around proposed Tower 5 must be managed as an inner protection area (IPA) up to the site boundary on the southern, northern and eastern aspect. The IPA must comprise:
  - Minimal fine fuel at ground level;
  - Grass mowed or grazed;
  - Trees and shrubs retained as clumps or islands and do not take up more than 20% of the area;
  - Trees and shrubs located far enough from buildings so that they will not ignite the building;
  - Garden beds with flammable shrubs not located under trees or within 10 metres of any windows or doors;
  - Minimal plant species that keep dead material or drop large quantities of ground fuel;
  - Tree canopy cover not more than 15%;
  - Tree canopies not located within 2 metres of the building;
  - Trees separated by 2-5 metres and do not provide a continuous canopy from the hazard to the building;
     and.
  - Lower limbs of trees removed up to a height of 2 metres above the ground.

#### **Construction Standards Conditions**

The intent of measures is that buildings are designed and constructed to withstand the potential impacts of bush fire attack. To achieve this, the following conditions shall apply:

2. New construction of the podium under proposed Towers 3, 4 and 5 and construction of proposed Towers 4 and 5 in entirety must comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2009 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 A3.7 Addendum Appendix 3 of Planning for Bush Fire Protection 2006.

## **Water and Utility Services Conditions**

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:

- 3. Water, electricity and gas must comply with the following:
  - All aboveground water pipes external to the building must be metal including and up to any taps/outlets/fittings.
  - Electrical transmission lines should be located underground where possible. Overhead electricity lines
    must have short pole spacing (i.e. 30 metres) except where crossing gullies, gorges or riparian areas. No
    tree may be closer to an electricity line than the distance set out in ISSC3 Guideline for Managing
    Vegetation Near Power Lines.
  - Gas must be installed and maintained as set out in the relevant standard and all pipes external to the building must be metal including and up to any taps/outlets/fittings. Polymer-sheathed flexible gas supply lines must not be used.

# **Landscaping Assessment Conditions**

The intent of measures is for landscaping. To achieve this, the following conditions shall apply:

- **4.** Landscaping of the site within the recommended Asset Protection Zones should comply with following principles of Appendix 5 of 'Planning for Bush Fire Protection 2006':
  - Suitable impervious areas are provided immediately surrounding the building such as courtyards, paths and driveways.
  - Grassed areas, mowed lawns or ground cover plantings are provided in close proximity to 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 should be isolated or located in small clusters).
  - Landscape species are chosen in consideration needs of the estimated size of the plant at maturity.
  - Species are avoided that have rough fibrous bark, or which keep/shed bark in long strips or retain dead material in their canopies.
  - Smooth bark species of tree are chosen which generally do not carry a fire up the bark into the crown.
  - Planting of deciduous species is avoided which may increase fuel at surface/ ground level (i.e. leaf litter).
  - Climbing species are avoided to walls and pergolas.
  - Combustible materials such as woodchips/mulch and flammable fuel are stored away from the building.
  - Combustible structures such as garden sheds, pergolas and materials such timber garden furniture are located way from the building.
  - Low flammability vegetation species are used.

#### **General Advice**

The NSW RFS was not able to verify the assessment set out in the bush fire report submitted with the application in terms of vegetation assessment and corresponding fuel loads. The NSW RFS has therefore undertaken an independent assessment of the proposal to determine compliance with Planning for Bush Fire Protection 2006. The recommended construction condition for the mixed use towers is based on an alternate modelling solution.

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

Yours sincerely,

Kalpana Varghese

Manager Planning & Environment Services Planning and Environment Services