



NSW RURAL FIRE SERVICE

Central Coast Council  
PO Box 20  
WYONG NSW 2259

Your Reference: PP 38/2013  
Our reference: SPI20201214000209

9 September 2021

**Attention:** Bruce Ronan

Dear Sir/Madam,

### **Planning Proposal to Allow Additional Permitted Uses at Glenworth Valley**

The New South Wales Rural Fire Service (NSW RFS) has reviewed the submitted Strategic Bush Fire Study prepared by CR Bushfire (Dated 7 June 2021, No Reference) in relation to the above Planning Proposal and advises that the organisation is not yet in a position to support the application at this time on the basis of the information provided.

The NSW RFS continues to raise concerns regarding the impacts of the projected numbers of people within the subject area, especially within the valley area, and those associated with existing development in relation to the emergency management and evacuation in the event of a bush fire attack given the area is surrounded by bush land. Given the number of people and context of the site and its surrounds, evacuation will not be able to occur in a timely fashion at full capacity with a fast approaching bush fire impacting the subject site.

The following issues, primarily related to emergency management and evacuation procedures, must be adequately addressed as part of any additional information provided:

- Further information must be provided which demonstrates that the occupants of the subject site can be evacuated in a timely fashion at full capacity, with regard to:
  - The projected timeframes currently limited to the travel time for one vehicle, which is not adequate given the nature of the existing developments and the projected number of occupants.
  - The triggers for the closure of the proposed development on days of extreme fire danger ratings in addition to days of catastrophic fire danger, due to the nature of the existing and future activities and the vulnerable occupants expected to use the proposed facilities.
  - A cap on number of users of the proposed facilities on the basis of how long it will take to evacuate the subject site at full capacity.
  - The mechanisms for the protection of occupants within the subject site where sheltering in place is considered the preferred option in the event of a bush fire. Concerns have been raised by operational staff associated with the local district that the subject site does not contain areas that would meet the

requirements for sheltering in accordance with Neighbourhood Safer Place guidelines and locating camping grounds within asset protection zones (APZs).

- The potential issues with mobilising multiple fire crews to the site and people attempting to leave given that the main access roads are narrow therefore problematic for heavy tanker and passing vehicles to occupy the same space. Furthermore, district staff have also raised concerns that the proposed alternative access routes will not provide safe access for the same reasons and that fires from the west are common in this area. It must also be demonstrated that the applicant has ongoing access to the proposed alternative access routes and the ability to upgrade them to comply with the requirements of *Planning for Bush Fire Protection (PBP) 2019*.
- The number of different activities (existing and future) occurring within the subject site, including bush walking, horse riding, festivals, other recreational and tourist activities, and how these will impact the emergency management and evacuation.

The Strategic Bush Fire Study must be updated to provide an analysis of compliance of the existing developments with the relevant requirements of *PBP 2019* and the impact future development will have on the existing facilities. The ability of future development to comply with the relevant requirements of *PBP 2019* based on their proposed locations and relation to existing development needs to be further explored.

As the existing and future developments include a number of development types considered as Special Fire Protection Purpose (SFPP) developments, the specific requirements for each need to be addressed in accordance with Chapter 6 of *PBP 2019*.

The updated Strategic Bush Fire Study must consider all aspects of the planning proposal. At this time, the report only considers the proposal in relation to the valley area. The Meriden report, prepared for the Ingleside Planning Proposal, is the standard for Strategic Bush Fire Studies in high risk scenarios.

It should be noted that the NSW RFS has not been supportive of allowing provisions for temporary accommodation or camping activities within land associated with 69 Cooks Road Glenworth Valley (CNR 5803 and CNR 7248) and as such is unlikely to be supportive of this section of the Planning Proposal, if sufficient justification is not provided.

If additional information is not received within 100 days the application will be closed. A formal request for re-assessment would be required after this time.

For any queries regarding this correspondence, please contact Emma Jensen on 1300 NSW RFS.

Yours sincerely,



Kalpana Varghese  
Supervisor, Development Assessment and Planning  
Planning and Environment Services (East)  
Built and Natural Environment