

2/32 West Street
(PO Box 568)
Forster NSW 2428
Phone: 02) 6555 2178
Fax: 02) 6555 2741

28 March 2008

Hill Top Residents Action Group
c/- Pike Pike and Fenwick Solicitors
Level 3 50 King Street
Sydney NSW 2000

Our Ref: 7202

Attention: Julie Cook

Dear Mrs Cook,

**COMMENTS IN RELATION TO BUSHFIRE ASSESSMENT:
HILL TOP REGIONAL SHOOTING FACILITY**

Thank you for your instructions in this matter.

We have been requested to review and make appropriate comment on the adequacy or otherwise of the bushfire assessment for the above project. The bushfire assessment, prepared by GHD (November 2007), is entitled "NSW Sport and Recreation, Report for Southern Highlands Regional Shooting Complex, Bushfire Hazard Assessment".

The bushfire assessment forms part of the Environmental Assessment for the project.

Section 1.1 (Introduction) of the NSW Rural Service guideline entitled *Planning for Bush Fire Protection 2006* (PBP) states that PBP *applies to all "development applications" on land that is classified as "bush fire prone land" (BPL), identified on a council's BPL map.*

The bushfire assessment states that:

- The application is for development on land mapped as bush fire prone land; and
- PBP 2006 does not apply to the proposed ranges.

Section 1 of PBP outlines the general principles underlying the document, including the principle that the smaller the interface a development has fronting the bushfire threat, the less the opportunity for bushfire to threaten the development.

It is clear that the interface of this development with the bushfire threat is significant, amounting to the perimeter of the ranges and, indeed, the vegetation contained within the site itself. Logically, the bushfire assessment should consider the interface of the main elements of the development, that is, the proposed ranges, and identify any additional

bushfire protection measures that may be necessary as a result.

Section 1.2 (How to comply with PBP) notes that “*applicants must demonstrate to the RFS or the consent authority that proposals satisfy the broad aim and objectives of PBP*”.

The bushfire assessment makes no mention of the relationship between the overall proposal – including the proposed ranges – and the broad aim and objectives of PBP.

Section 3.1.5 (Use as a shooting complex) of the bushfire assessment notes that there may be a concern with respect to use of the shooting complex on days of high fire danger. Importantly, given the nature of the project, the bushfire assessment does not take into account the potential for ignitions to occur due to ricochets from rock formations, targets etc. The potential for this to occur should be addressed. Also, measures to limit the use of the facility on extreme fire warning days should be incorporated into the management of the facility. This is important also from an emergency management point of view, where emergency services intervention may be required to evacuate the complex.

Section 4.4 of the bushfire assessment (Access and Egress) makes various recommendations in relation to the property access roads from Wattle Ridge Road to the proposed buildings. The bushfire assessment does not appear to take into account the adequacy of wattle Ridge Road for its length to provide satisfactory access to and egress from the site in the event of a bushfire emergency. This should take into account a scenario where emergency services may need to access the site via wattle Ridge Road at the same time that people using the shooting facility are seeking escape from the complex in the event of a bushfire. The width of Wattle Ridge Road would be critical under such circumstances and the bushfire assessment should identify any upgrading works that may be necessary to facilitate access to and egress from the site in a bushfire emergency as discussed above.

Section 4.5 of the bushfire assessment (Bush Fire Hazard Remaining on the Site) identifies that 985 hectares of the site will remain as native vegetation. The management of this vegetation is one of the key issues identified in the DGRs. The bushfire assessment notes that *the proposal is consistent with the existing use of the land and the existing identification under the Bushfire Risk Management Plan as “Land Management” so it will not alter the hazard*.

This does not appear to satisfy the scope of the issue noted in the DGRs. The hazard that will remain on the site is significant and the DGRs imply a level of assessment and management for this hazard with consideration of the current proposal and contemporary management practices. Furthermore, the DGRs indicate that it is important that a Bushfire Management Plan to be established for the hazard remaining on the site to enable its satisfactory management by the proponent, in this case, the NSW Department of Sport & Recreation. Any bushfire management plan should also, importantly, take into account issues such as:

- Impacts on flora and fauna;
- The elements of the use of the site that may give rise to potential ignitions such as the risk of arson arising from increased access to areas adjacent to vegetation and the potential for ignitions to occur due to ricochets from rock formations, targets etc.; and
- The range of measures to be implemented to mitigate the escape of wildfire off the site onto adjoining lands in the event of ignition of a bushfire (within the site).

Section 4.7 (Emergency Plan and procedures manual) of the bushfire assessment states that an emergency plan and procedures manual is to be prepared and approved by the

NSWRFS prior to utilisation of the clubhouse and range. The discussion in the bushfire assessment of this aspect of the DGRs lists a number of generic elements to be included in the (proposed) emergency plan and procedures manual. In this regard, the bushfire assessment does not appear to satisfy the scope of the relevant DGR as the assessment does not identify evacuation measures/strategies to be implemented in a bushfire event.

In my opinion, the bushfire assessment aspect of the project should be revisited to address the issues that have been identified above as being of concern. The issues of concern relate to key aspects of the DGRs with respect to the bushfire assessment. Unless and until the above matters are addressed, I am of the opinion that no reasonable person would approve the application given the present form of the bushfire assessment.

We trust that the above information will be of assistance to you in your review of the environmental assessment for the project.

Yours faithfully,



SIMON CARROLL
Grad Dip in Design for Bushfire Prone Areas
Certified Practitioner (A),
Bushfire Planning and Design FPAA