



NSW RURAL FIRE SERVICE



Department of Planning Industry and Environment
GPO Box 39
Sydney NSW 2001

Our reference: SPI20200821000146
7 September 2020

Attention: Kate Masters

Dear Sir/Madam,

NSW Rural Fire Service Comment - Wagga Wagga Activation Precinct

Reference is made to Department of Planning Industry and Environment's correspondence dated 19 August 2020 seeking the NSW Rural Fire Services (RFS) feedback on the draft Master Plan for the Wagga Wagga Activation Precinct and the proposed amendment of the State Environmental Planning Policy (Activation Precincts) 2020.

The NSW Rural Fire Services has reviewed the documentation and recommends the following matters are addressed prior to any progression of the exhibited Master Plan. The NSW RFS recommends the matters outlined below are resolved prior to progression to ensure stakeholders and future phases are aware of likely implications of compliance with relevant provisions of Planning for Bushfire Protection (PBP) 2019. Implications resulting from bush fire considerations may potentially constrain/restrict suitability of permissible/planned land uses and densities within the Activation Precinct.

1. The Bush Fire Prone Land (BFPL) mapping for Wagga Wagga Council is currently under review, with a draft version that includes mapping of vegetation communities in accordance with the Bush Fire Prone Land Mapping Guidelines Version 5b (November 2015), which are not currently mapped. The draft updated bush fire prone land map will include grasslands, freshwater wetlands, semi-arid woodlands, and arid shrublands. Under the draft Bush Fire Prone Land (BFPL) map the entire precinct area, with the exemptions of areas within Bowmen Business Park contains vegetation mapped as a hazard. The Master Planning and Delivery Precinct planning phases should therefore ensure future development reflects risks associated with the Draft BFPL map for the Activation Precinct.
2. The Activation Precinct SEPP appears to remove requirements for development assessment under the *Environmental Planning and Assessment Act 1979*, through the creation of Master plans, Delivery Plans and Activation Precinct Certificates. It is not clear how the proposed planning and legislative processes will address the following matters:
 - (a) Section 100B of the *Rural Fires Act* prohibits Complying Development for any land uses and proposed developments that are considered to be Special Fire Protection Purpose and/or subdivisions of rural or rural residential land. It is unclear how the AP SEPP will address the likely conflict between Section 100B of the *Rural Fires Act*.

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- (b) Ensure developers and future landowners are aware of likely requirements for State Significant Development and subdivisions for industrial, commercial and residential development. Such as likely requirements for perimeter public roads, restrictions on the permitted length of dead end roads, asset protection zones (APZs) - which may restrict the developable portion of land within the precinct area, construction standards and emergency and evacuation.
- (c) Ensure the Master Plan identifies any likely constraints to land development and land uses within the activation precinct.

NOTE – For example section 8.3.9 'Hazardous Industry' of PBP 2019 states that Hydrogen Facilities and other Hazardous Industries involving the storage of hazardous material development should be avoided on bush fire prone land. The approval of any land uses of this kind should be limited to locations within the landscape where the risk profile can be considered acceptable and is adequately mitigated.

- (d) Ensure key public roads provide suitable evacuation opportunities of the fully development Activation Precinct, including at beginning stages through to a fully developed Activation Precinct.

NOTE – As a suggestion, could the Draft Master Plan be amended to include a section addressing the above matters (including identification of any key requirements/constraints within the Activation Precinct to inform future Delivery Planning needs). In relation to bush fire, this may include Delivery Plans submitting evidence that a plan (i) is consistent with relevant requirements of Planning for Bushfire Protection 2019, (ii) proposed development suitable for the site, (iii) proposes development of an appropriate density and (iv) proposes a pathway to ensure future development contains suitable bush fire protection measures.

3. The scope of the Wagga Wagga Activation Precinct, as illustrated in the submitted documentation is likely to require an increase in operational response capacity for emergency services, including the NSW Rural Fire Service. The intensification of commercial and industrial uses within the SAP precinct is likely to increase the population of people and assets at risk of fire within the landscape and may require the provision of additional operational response capacities in surrounding areas (i.e. new brigade stations, adequate resourcing for first responders, air support, fire control centres etc.).

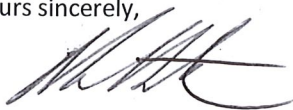
The Master Plan and Delivery Precinct should ensure service and infrastructure delivery addresses operational response of fire fighting agencies to ensure appropriate coverage is available throughout the Activation Precinct. In considering future operational fire fighting infrastructure requirements the following matters shall be addressed in consultation with NSW Rural Fire Service Riverina District:

- Identify what proposed servicing arrangements are required for the future community. Future servicing shall address geographical constraints inherent in the location of existing emergency service agencies within Wagga Wagga. The majority of emergency services in Wagga Wagga are located south of the Murrumbidgee River, and the Activation Precinct located north of the river. Consideration shall be given to enhancing existing emergency response capabilities and ensuring suitable vehicular access is provided across the river allowing for the timely response of emergency services.;
- Identify whether proposed servicing arrangements for the community are practical;
- Discuss any issues that may result from the interplay of service delivery options;
- Identify any infrastructure issues including financial contributions; and
- Identify timelines for the delivery of proposed servicing arrangements.

The NSW RFS supports the premise of Activation Precincts, including a focus on strategic level assessment to ensure future development is streamlined. In recognition of the scale and complexity of the project, the NSW RFS is prepared to meet with DPIE and key stakeholders to further explain any matters raised in this correspondence and explore pathways forward.

If you have any queries regarding this advice, please contact Peter Dowse, Development Assessment and Planning Officer, on 1300 NSW RFS.

Yours sincerely,

A handwritten signature in dark ink, appearing to be 'M. Dotter', with a stylized, flowing script.

Martha Dotter
Acting Team Leader, Development Assessment and Planning
Planning and Environment Services (South)