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GLENWORTH VALLEY OUTDOOR ADVENTURES

Bush Fire Strategic Study

for

Glenworth Valley Outdoor Adventures

Monday 7 June 2021

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Executive Summary.

This Bushfire Strategic Study has been prepared to support a Planning Proposal for additional permitted uses at Glenworth Valley Outdoor Adventures. The subject site is a nationally and regionally significant facility and is subject to a number of existing uses, including 4-day music festivals with camping which accommodate up to 15,000 people and a range of adventure related activities. The site has a long history of development consents dating back in excess of 50 years. The Planning Proposal LEP amendment request was submitted to Council for the primary purpose of formalising the already occurring existing uses, although the ability to incorporate other future development applications is also considered.

The Bushfire Strategic Study follows the heads of criteria outlined within Chapter 4 of *Planning for Bush Fire Protection 2019*. Other high-level guidance provided by the Australian Institute of Disaster Resilience and the Planning Institute of Australia is also considered. The study provides a landscape assessment, a Bush Fire Risk Management assessment, an access assessment and an assessment of the emergency management and infrastructure features on site.

The site itself is a large, cleared site within a bushfire-prone landscape. The vegetation surrounding the site is made up of wet and dry sclerophyll forest and coastal heath. The landscape is steeply sloping and at high risk of bushfire ignition. Nevertheless, the site itself represents large swathes of cleared land, which allow for extensive setbacks that are easily compliant with the asset protection zone requirements of *Planning for Bush Fire Protection (PBP)*.

There is a highly developed and organised access system within the site, which is designed to cater for the movement of large numbers of people who attend a number of large-scale events and music festivals held throughout the year. The primary access into the valley floor is compliant with PBP. There are two alternative access roads which provide alternate directions of travel to the primary access, a real advantage in case of road access roads being overrun by fires or smoke. Evacuation of the site is the primary consideration and is achievable. There are significant areas of the site which meet the requirements of the Neighbourhood Safer Places Guidelines and a multi-purpose function centre which is built to BAL-12.5 and can also operate as a place of last resort.

The owner of the site is particularly motivated to ensure that the property, including access roads, is maintained and that bushfire protection is of a high quality. The cancellation of the Lost Paradise music festival in the 2019/2020 fire season is testament to this. The operators also have a good relationship with the local NSW RFS and communicate regularly with them to receive early warning of fire conditions.

Overall, some mitigation is required to demonstrate that the bushfire risk to the site is As Low As Reasonably Practical (AIDR, 2020). This is an appropriate assessment in this case because we are formalising existing uses rather than proposing new uses. In actual fact, we are presented with a unique opportunity to provide formal bush fire protection to existing uses within a high-risk landscape. For this reason, it is important that the Planning Proposal proceed with recommended mitigation, including a Bushfire Emergency Management Plan.

Any future tourism uses on the site will be subject to future development applications and future assessment of specific bushfire requirements. However, the Bushfire Strategic Study investigates, indicatively, the ability for future uses to meet the requirements of *Planning for Bush Fire Protection 2019* and recommends that the Bushfire Emergency Management Plan is updated and submitted with a DA for each new use exploring the carrying capacity of the site and the different emergency evacuation options.

1 Introduction.

This report has been prepared on behalf of Glenworth Valley Outdoor Adventures in relation to a planning proposal submitted to Central Coast Council to allow additional permitted uses on land at Glenworth Valley and Calga, known as Glenworth Valley Outdoor Adventures.

The site has been subject to a Planning Proposal originally submitted in 2013 to add additional permitted uses to the site's LEP controls which would have the effect of formalising existing uses. At a meeting of Council on 27 April 2020, it was resolved that Council support an amended Planning Proposal to amend the Gosford Local Environmental Plan 2014 (or draft Central Coast Local Environmental Plan), whichever is in effect at the time, to permit the following additional permitted uses:

- a. on land zoned E2 Environmental Conservation, development for the purpose of eco-tourist facilities and recreation facilities (outdoor);
- b. on land zoned RU2 Rural Landscape, development for the purposes of eco-tourist facilities, camping grounds and tourist and visitor accommodation;
- c. on the existing cleared areas of the land zoned E2 Environmental Conservation, comprising Lots 19, 20, 21, 23, 25, 30, 32, 33, 37, 50, 53, 64, 68, 85, 86, 87, 89, 91, n108 and 145 DP 755221, Lots 22 and 32 DP 755253, Lot 3 DP 617088, Lot 245 DP 48817, Lot 7039 DP 1059766 and Lot 7303 DP 1154929, development for the purpose of extensive agriculture.
- d. on land comprising that part of Lot 89 DP 755221 which currently accommodates the multi-purpose building and its curtilage,
 - i. development for the purpose of function centre, entertainment facility and food and drink premises, and
 - ii. the total floor area for the function centre, entertainment facility and food and drink premises is to be a maximum of 1500m² with any additions being attached to, or directly adjacent to, the existing building
- e. on the existing cleared areas of the land zoned E2 Environmental Conservation comprising part of Lots 19, 37 and 89 DP 755221 and Lots 22 and 32 DP 755253, development for the purpose of function centre and camping ground.
- f. on the existing cleared areas of the land zoned E2 Environmental Conservation comprising part of Lots 108 and 145 DP 755221, development for the purpose of tourist and visitor accommodation.

A map of the proposed additional permitted uses taken from the Planning Proposal report is shown below:

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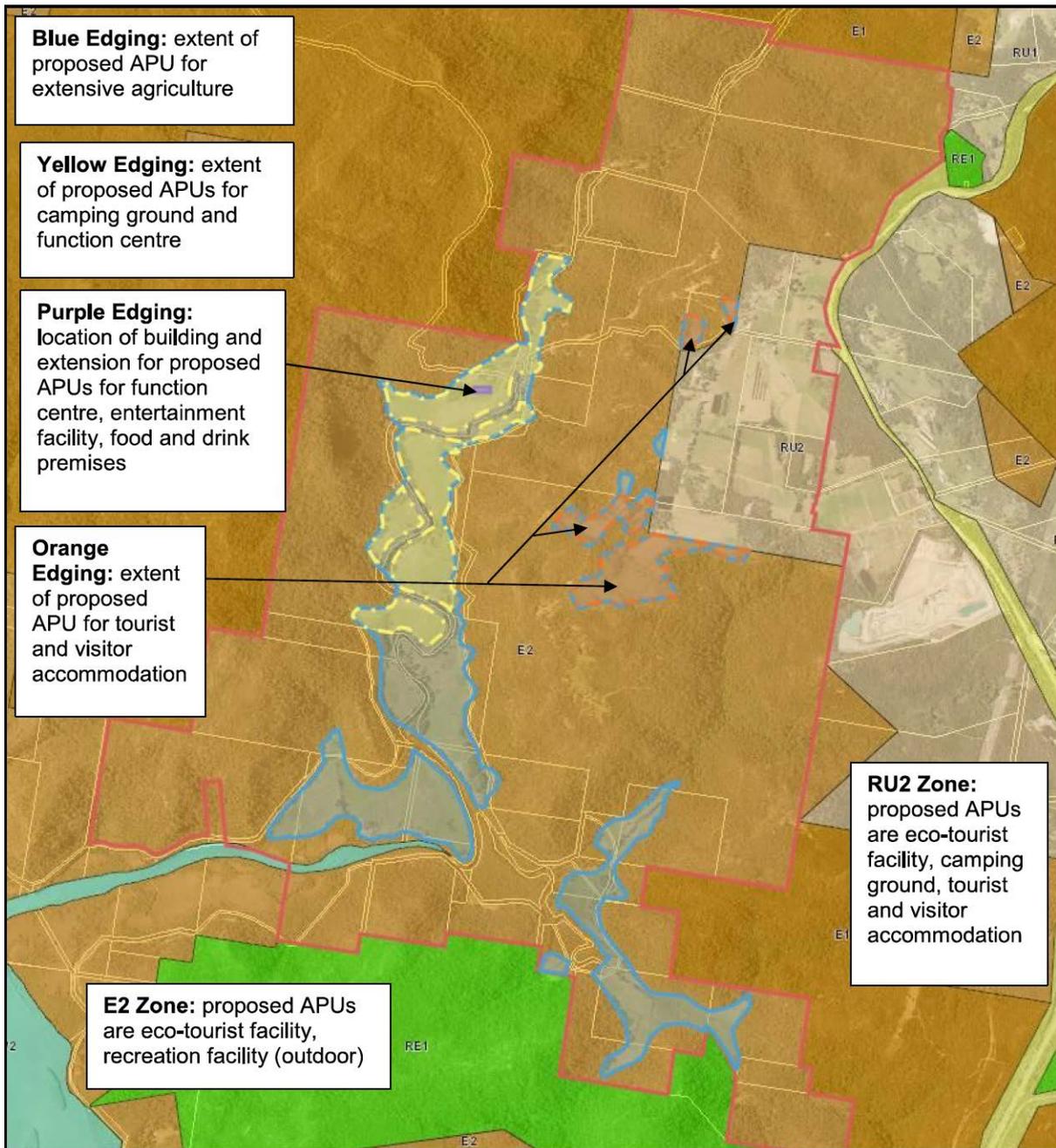


Figure 1: Proposed additional permitted uses taken from Planning Proposal report 11 November 2019

Council applied to the NSW Department of Planning Industry and Environment for Council delegation to undertake community and public authority consultation and finalise and make the draft Local Environmental Plan.

The NSW Rural Fire Service (NSW RFS) were consulted on the amended planning proposal. Their letter, dated 8 January 2021, states that a Bush Fire Strategic Study must be provided encompassing the entirety of the Planning Proposal. The letter requires the Bush Fire Strategic Study to include a hazard study that includes the broader locality to ensure that infrastructure within the subject site and wider area is adequate to support future SFPP development in the area. The purpose of this report is to provide the Bush Fire Strategic Study and address the requirements of the NSW RFS.

2 Background.

2.1 Site description

Glenworth Valley Outdoor Adventures is a nationally significant tourism and leisure destination within the NSW Central Coast hinterland, which is recognised as a highly successful tourism destination with a considerable profile in the Sydney and Central Coast regions. The facility operates on 3,000 acres of land and has provided horse riding adventures since 1969. The current owners and operators of the facility, the Lawler family, obtained the facility in 1972 and have expanded the business to become the largest horse-riding centre in Australia.

More recently, the facility has expanded into outdoor adventure activities including quad biking, abseiling, kayaking and laser skirmish. The Events Centre on site opened in 2016 to host weddings, corporate and private functions catering for up to 300 guests.

The facility has an outstanding reputation and has received numerous tourism industry awards as well as featuring on popular television programs.

The site is situated approximately 1 hour drive north of Sydney's CBD using the M1 Motorway. The entrance to Glenworth Valley Outdoor Adventures is located approximately 3km off the M1 along Peats Ridge Road. Gosford is also situated approximately 15 minutes' drive north of Glenworth Valley. The following aerial photograph shows the site's location.

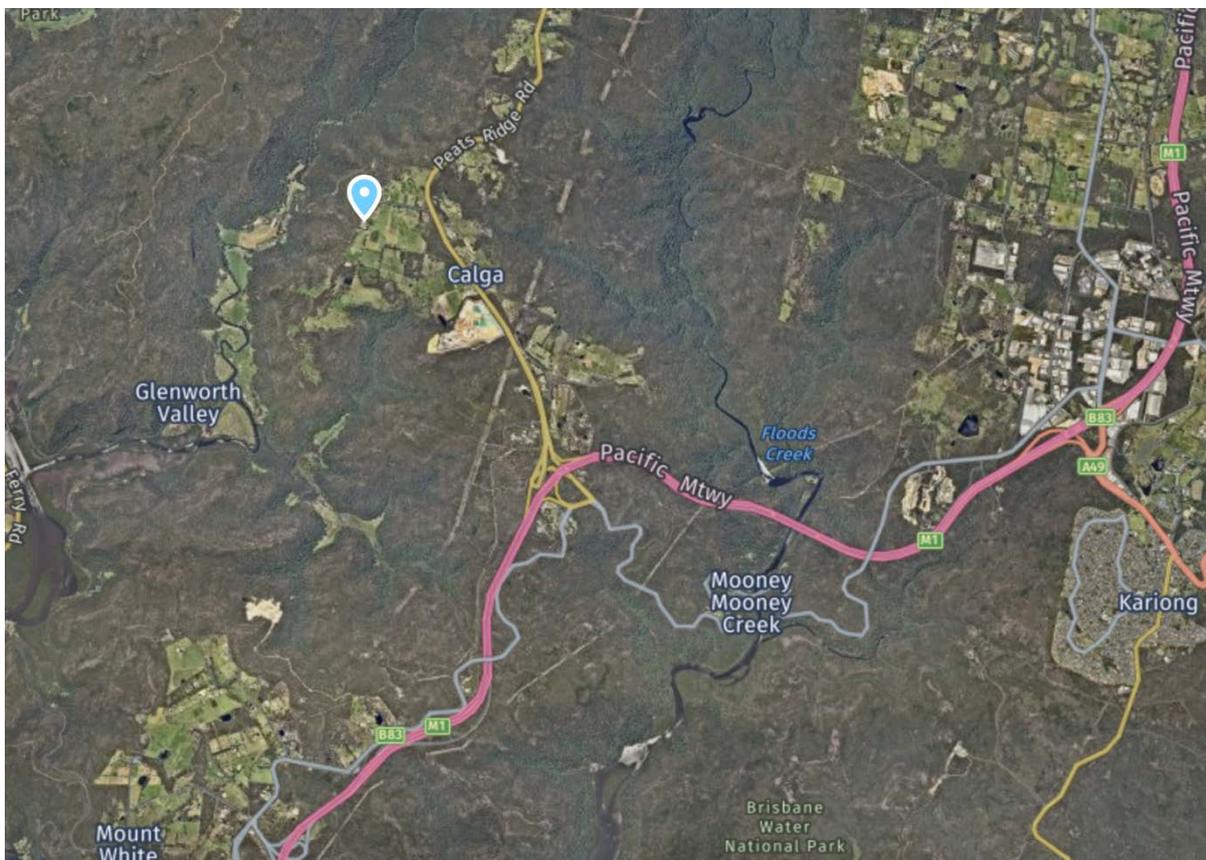


Figure 2: Location Plan (Nearmap 2021)

2.2 Existing land use planning context

The Gosford Local Environmental Plan (LEP) was gazetted in 2014. The zoning applied to the site under the Gosford LEP 2014 is part E2 Environmental Conservation and part RU2 Rural Landscape. The land ownership and zoning applicability within the site is shown below:

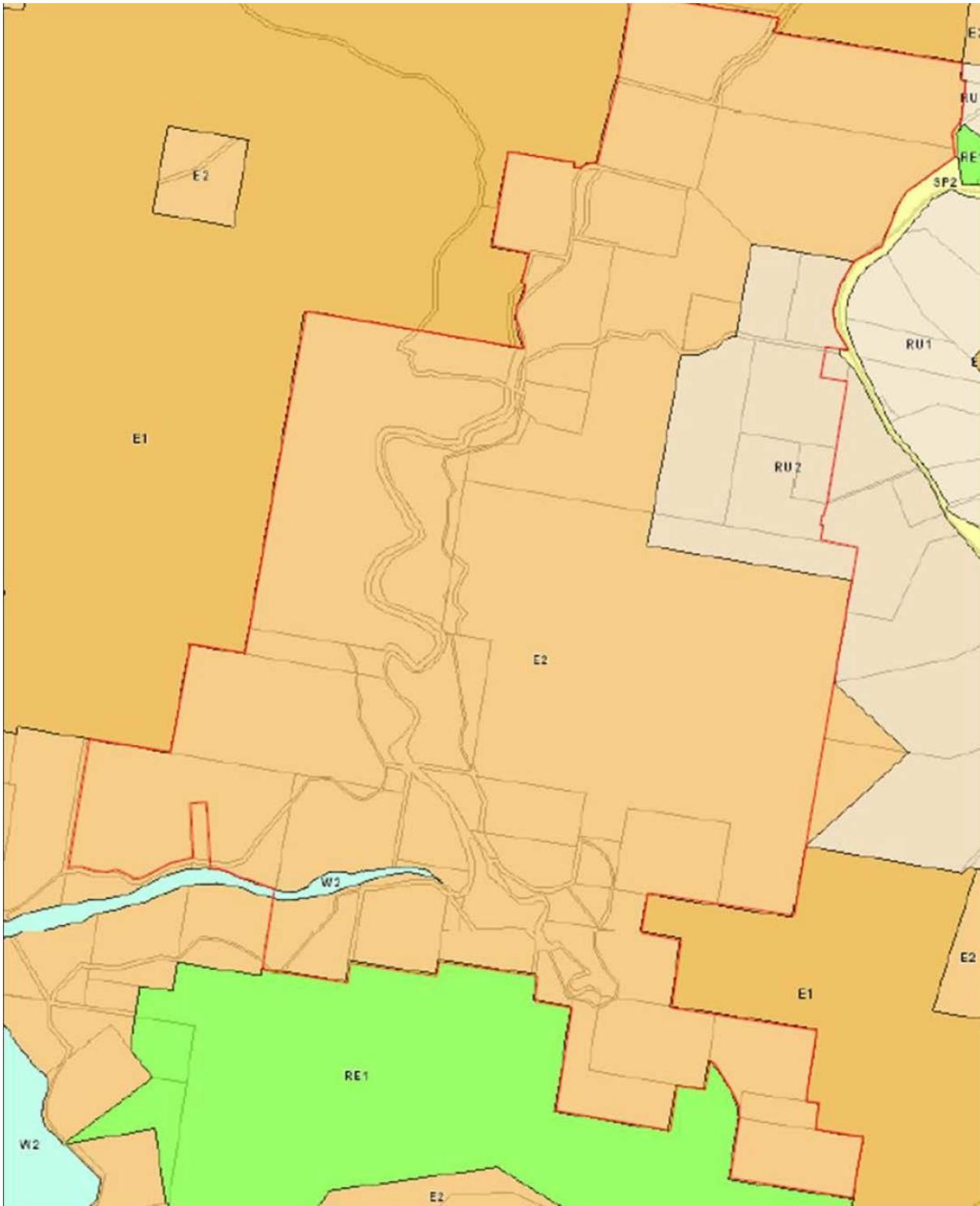


Figure 3: Current land use zoning (taken from Original Planning Proposal report)

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The current uses on site are long-established through various consents, existing use rights and historic zonings. The primary use of the site as a horse-riding school is no longer permissible within the E2 Environmental Conservation zone. The continuation of this use is enabled through the “existing use rights” provisions of the *Environmental Planning and Assessment Act 1979*.

Consent was granted for other uses on the basis of the existing non-conforming use. Up to 2006, existing use rights provided for the continuation of previous rights to operate the same use on a parcel of land. The *Environmental Planning and Assessment Regulation 2000* was amended on 29 March 2006 such that it was no longer possible to change from one prohibited use to another prohibited use without a rezoning.

Development consents granted on the site include:

- DA 2839/1999 – 4-day music festival with camping (15,000 people per day)
- DA 25818/2004 – small scale music festivals (2,500 people per day)
- DA 19911/2003 – recreation facility – paintball
- DA20082/2003 – recreation facility – quad bike tours

Since 2006, the only development consents issued for uses not permitted in the zone related to a temporary use of land and an ancillary use to approved development on the site as follows:

- DA 45588/2014 – recreation facility – equestrian and running events for up to 10,000 people per day (temporary use)
- DA 44773/2013 – multi-purpose building (ancillary to approved uses on site)

A further DA was approved in 2013 (DA 43465/2013) for 3 motel units and 5 caravan sites (i.e. relocatable cabins) on land which is now zoned RU2 Rural Landscape. This development consent was issued when the land was zoned 7(b) Conservation and Scenic Protection (Scenic Protection) under IDO 122 and motels and caravan parks were permitted uses and was referred to the NSW RFS for assessment.

The original Planning Proposal submitted in 2013 sought to provide certainty for the continuation of these existing uses on the subject site and to provide opportunities for similar additional recreation and tourist related developments in the future.

2.3 Bushfire context

There have been two previous bushfire reports prepared for the subject property relating to the original Planning Proposal. The previous reports make the following significant points in relation to the bushfire context of the site:

- The base of the valley is a pasture improved grazing area up to 370 metres in width and extends for over 5km along Popran Creek.
- The site has the potential to provide Asset Protection Zones fully compliant with Tables 2.4 or 2.6 within Planning for Bush Fire Protection 2006.
- The potential bushfire impact towards the existing and possible future development within the valley is predominantly from fires travel downhill through forest vegetation.
- The capacity to comply with and/or exceed the requirements for Special Fire Protection Purpose (SFPP) development is of paramount importance and was clearly demonstrated and accepted in the development approval for the multi-purpose function centre.
- Within the valley are significant areas which are for camping, congregation and fire appliance staging where the expected radiant heat impact complies with the minimum specifications for a neighbourhood safer place.
- Fires travelling downhill into a valley are slower, less intense and have significantly shorter flame lengths than uphill fires.

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A letter was received from the NSW RFS in response to a previous version of the Planning Proposal on 10 February 2016. The letter stated that the NSW RFS had no objection to the Planning Proposal, subject to future development proposals complying with the provisions of *Planning for Bush Fire Protection 2006*.

Since the 2016 letter, a revised *Planning for Bush Fire Protection* was published in 2019 which includes additional provisions relating to strategic bushfire planning. This changed the stage somewhat with regard to the process for assessing Planning Proposals in bushfire prone areas. In January 2021, the requirements of the NSW RFS were amended to align with the publication of the revised PBP and the requirement to provide a Bush Fire Strategic Study for this site was introduced.

Both letters provided by NSW RFS can be seen at Appendix A.

3 Bush Fire Strategic Study

The Bush Fire Strategic Study (BFSS) was introduced in NSW by Planning for Bush Fire Protection 2019 (PBP 2019). The BFSS follows the principles of strategic planning generally in taking a long-term approach to land use planning and development expectations. The approach to a BFSS aims to minimise or avoid the impact of natural hazards by taking a risk-based approach to the assessment of strategic planning policies and proposals. The BFSS uses a macro-scale assessment, creates a risk profile for the planning proposal and seeks to respond to that risk assessment.

There are a number of national level guidance documents which provide helpful guidance in preparing strategic studies for natural hazard resilience. At a high level, the stage is set for consideration for natural hazards in strategic planning by the *Sendai Framework for Disaster Risk Reduction 2015-2030* (UNDRR, 2015), *The National Disaster Risk Reduction Framework* (Australian Government Department of Home Affairs, 2018), *Profiling Australia's Vulnerability: The interconnected causes and cascading effects of systemic disaster risk* (Australian Government Department of Home Affairs, 2018) and the *National Strategy for Disaster Resilience* (COAG, 2011).

The Land Use Planning for Disaster Resilient Communities published in 2020 by the Australian Institute for Disaster Resilience focusses on reducing disaster risk by improving strategic planning processes. The handbook aims to reduce both vulnerability and exposure of communities to natural hazard scenarios.

"By considering natural hazards early and through its processes, land use planning can evaluate and select land use mechanisms to treat disaster risk"

The actions proposed by the Handbook are to understand disaster risk, make accountable decisions, establish governance, ownership and responsibility and ultimately, attract enhanced investment for reduce the risk. Ultimately, the goal is to make decisions which avoid risk. However, accepting that some level of risk is inevitable, the concept of risk tolerance and acceptable risk is highlighted. The Handbook uses a key principle introduced by the Planning Institute of Australia *National Land Use Planning Guidelines for Disaster Resilient Communities* (2015) which is the ALARP principle (As Low As Reasonably Practicable). This revolves around identifying risks that are broadly acceptable, tolerable, or generally intolerable and requires the identification of risk treatment options to move more towards the tolerable or broadly acceptable categories.

The Handbook highlights the role that land use planning can play in climate change mitigation and adaptation. Future climate change models should be identified and utilised in the process of data gathering and analysis, whilst also acknowledging the uncertainties associated with those models.

The relationship with emergency management principles is highlighted by the Land Use Planning Handbook. The integration of risk management and land use planning is recommended. The National Emergency Risk Assessment Guidelines produced by AIDR sets out the following structure for evaluating risk and applying risk treatment:

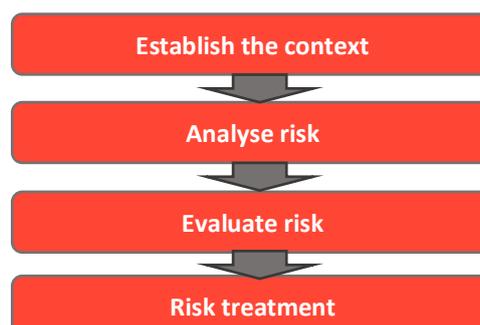


Figure 4: Risk Management Approach taken from NERAG

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This process is appropriate for the BFSS and will be followed to establish the risk and recommended risk treatment for the planning proposal.

Legislatively, planning proposals must follow the Ministerial Directions under Section 9.1(2) of the *Environmental Planning and Assessment Act 1979*. Direction 4.4 requires a planning proposal to have regard to PBP 2019, introduce controls that avoid placing inappropriate developments in hazardous areas and ensure that bushfire hazard reduction is not prohibited within the APZ. The planning proposal must also comply with the following provisions:

1. (a) provide an Asset Protection Zone (APZ) incorporating at a minimum:
 1. (i) an Inner Protection Area bounded by a perimeter road or reserve which circumscribes the hazard side of the land intended for development and has a building line consistent with the incorporation of an APZ, within the property, and
 2. (ii) an Outer Protection Area managed for hazard reduction and located on the bushland side of the perimeter road,
2. (b) for infill development (that is development within an already subdivided area), where an appropriate APZ cannot be achieved, provide for an appropriate performance standard, in consultation with the NSW Rural Fire Service. If the provisions of the planning proposal permit Special Fire Protection Purposes (as defined under section 100B of the Rural Fires Act 1997), the APZ provisions must be complied with,
3. (c) contain provisions for two-way access roads which links to perimeter roads and/or to fire trail networks,
4. (d) contain provisions for adequate water supply for firefighting purposes,
5. (e) minimise the perimeter of the area of land interfacing the hazard which may be developed,
6. (f) introduce controls on the placement of combustible materials in the Inner Protection Area.

PBP 2019 provides high level considerations for a BFSS and also provides development standards for resultant development applications. This BFSS follows the considerations outlined within Table 4.2.1 of PBP 2019 to identify and analyse the risk profile and apply risk treatment measures. The aim of the BFSS is to meet the following principles:

- ensure the land is suitable for the proposed additional uses in the context of bush fire risk;
- ensure any new development resulting from the planning proposal will comply with PBP 2019;
- any reliance on future performance-based solutions is minimised;
- adequate infrastructure is provided associated with emergency evacuation and firefighting operations; and
- appropriate ongoing land management practices are facilitated.

This Bushfire Strategic Study has been carried out over a 5km area, which gives a good picture of the landscape surrounding the site and the road network surrounding the site.

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CR Bushfire.	Source:	Boundaries: NSW Department of Finance, Services and Innovation 2021 Aerial photo: NSW Department of Finance, Services and Innovation 2016	<p>0 500 1,000 1,500 2,000 Metres A3 Scale: 1:55,000 Coordinate System: GDA 1994 MGA Zone 56</p>	69 Cooks Road Glenworth Valley	Aerial Photo (2016)
	Disclaimer:	No warranty is given in relation to the data (including accuracy, reliability, completeness, currency or availability) and no liability is accepted (including without limitation, liability in negligence) for any loss, damage or other (including consequential) damage resulting from any use of the data. Data must not be used for direct marketing or be used in breach of the privacy laws.			
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Figure 5: 5km Landscape

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4 Landscape Assessment.

4.1 Location and Aspect

The subject site is approximately 1173.6 hectares in size. Current land uses on site are situated within two main areas on the site, the first is located within the RU2 zone on Cooks Road. The second is located within the E2 zone at the valley floor. In terms of aspect, the site is subject to potential bushfire threat from all directions, there is no one aspect of the site which is more vulnerable than other aspects.

The most high-risk bushfire prone aspect of the site is the North-West, as north-westerly winds are the driest and hottest experienced on the East coast of Australia. Bushfires fuelled by north-westerly winds are generally hotter and more intense than bushfires originating from other aspects.

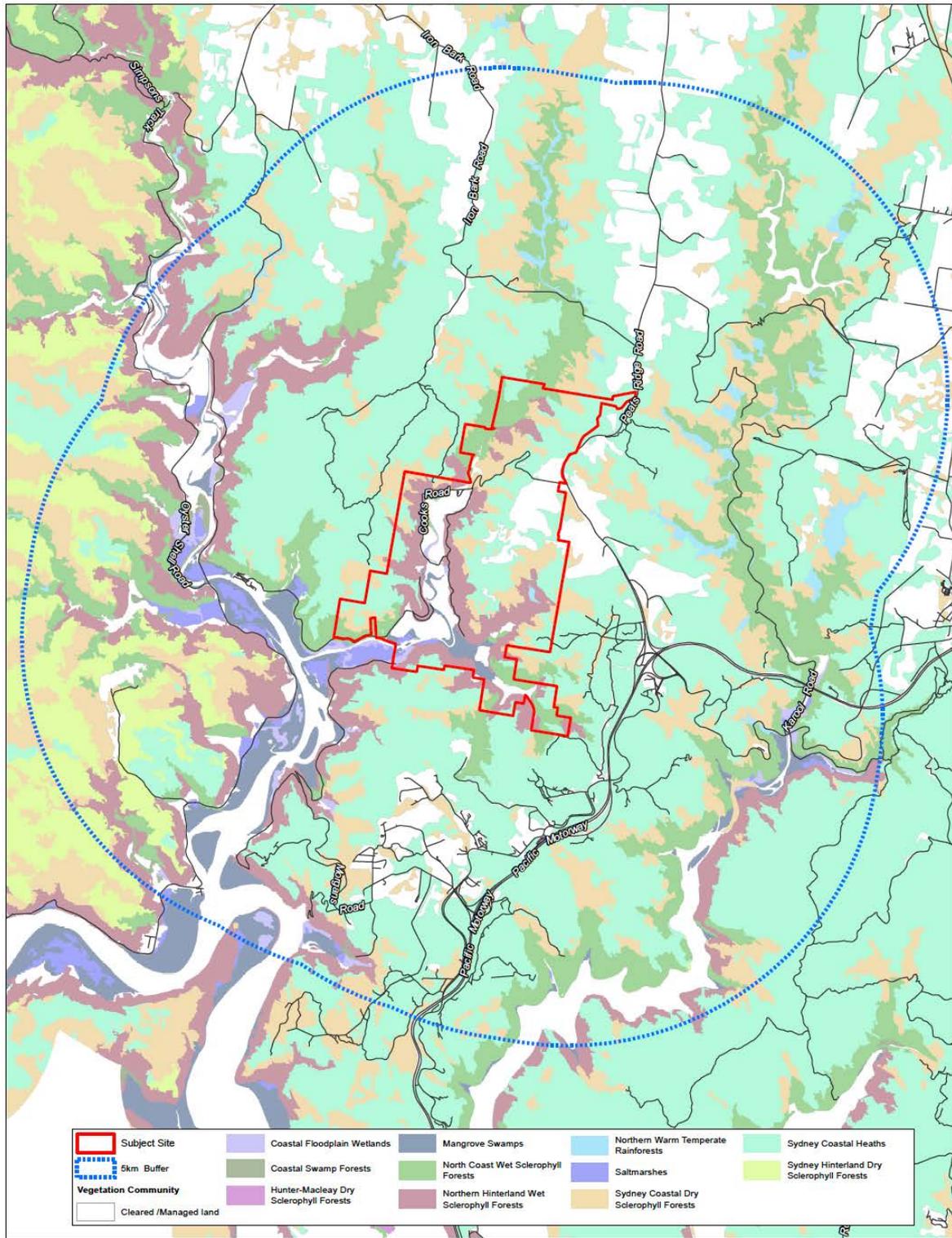
Wind changes under hot, dry weather can also lead to dangerous bushfire conditions. The wind often changes direction from a North-Westerly wind to a Southerly wind on the worst bushfire danger days. This can turn a fire front from burning on a South-Easterly direction towards assets to a fully developed fire front heading in a Northerly direction towards assets. This change in direction often creates difficult conditions for suppression and can catch communities unaware when they believe a fire front has already passed.

Although these are the two most likely scenarios for fire in the area, there is possibility of fire emerging from any direction as there is bushfire prone vegetation surrounding the site in all directions.

4.2 Vegetation

The subject site itself consists of cleared managed land within the RU2 zone and on the valley floor surrounded by a mixture of dry and wet sclerophyll forests, mangrove swamps, saltmarshes, coastal floodplain wetlands and coastal heaths. These formations can be seen in the Vegetation Formation map below.

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<h2>CR Bushfire.</h2>	<p>Source: Boundaries NSW Department of Finance, Services and Innovation 2011 Vegetation Formation: Greater Hunter Native Vegetation Mapping v4.0, V01 ID 3655</p>		<p>69 Cooks Road Glenworth Valley</p>	<h2>Vegetation (Greater Hunter)</h2>
	<p>Disclaimer: The contents are given in relation to the data provided accuracy, reliability, completeness, currency or suitability and the liability is excluded for the use of the data. No warranty is made for any loss, damage or costs (including consequential damage) resulting from any use of the data. Data must not be used for direct marketing or be used in breach of the privacy laws.</p>			
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Figure 6: Vegetation Formation Map (Greater Hunter)

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The Greater Hunter Native Vegetation Mapping maps the valley floor as 'cleared managed land'. Surrounding the valley floor on both sides are steep areas of Northern Hinterland Wet Sclerophyll Forests, beyond this lies Sydney Coastal Dry Sclerophyll Forests and beyond this a vast swathe of Sydney Coastal Heath with pockets of Sydney Coastal Dry Sclerophyll Forest mixed in. To the South West and South East extremities of the subject site lies North Coast Wet Sclerophyll Forest and to the South West a mixture of Coastal Floodplain Wetlands and Saltmarshes. There are also Mangrove Swamps mapped in the South East corner of the site.

In terms of fuel loads, the vegetation within the valley floor surrounding the proposed additional uses is not considered to be bushfire prone. This is also represented on the Central Coast Bushfire Prone Land Map (shown in Figure 4 below). The land shown as bushfire prone within the valley floor is within buffer areas. The NSW RFS and Central Coast Council must have taken the decision that the cleared areas of the valley floor do not pose a bushfire threat. Nevertheless, the buffer areas are those in which people could be affected by a bushfire in adjoining vegetation. The orange-coloured areas are those of the highest threat vegetation such as forests and heaths. The yellow-coloured areas are areas of lower fuel loads, such as moist forests or scrublands.

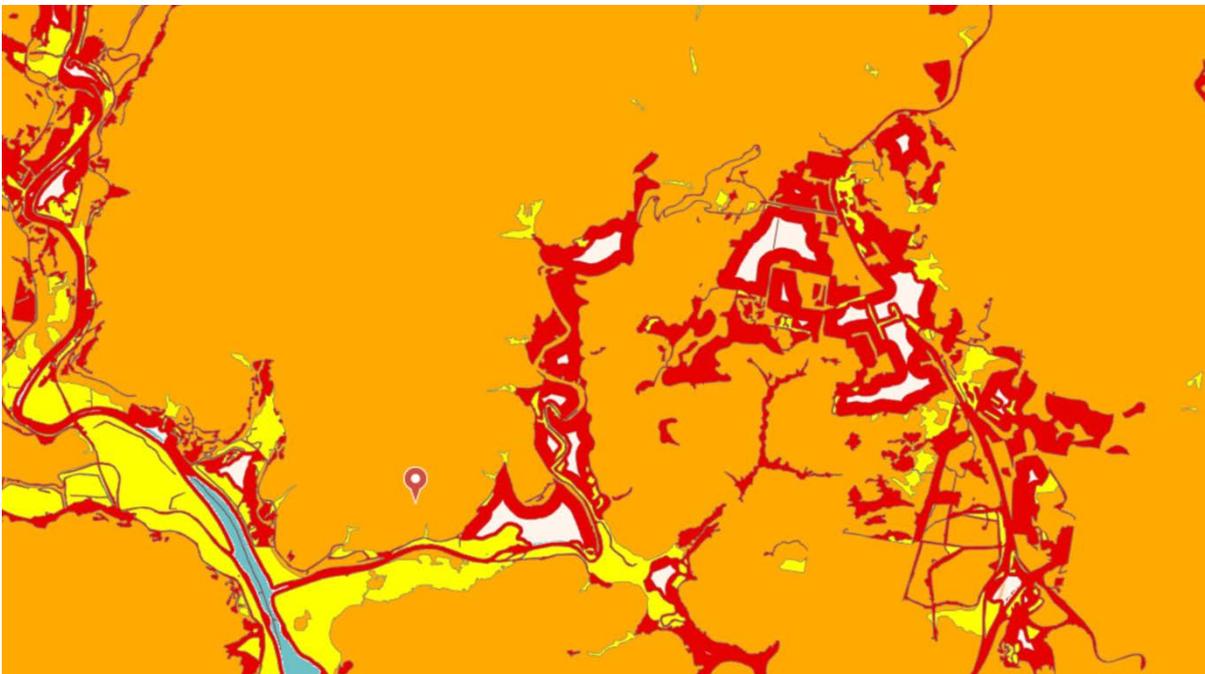


Figure 7: Extract from Central Coast Bushfire Prone Land Map

Vegetation surrounding the valley floor is highly bushfire prone. Areas of Sydney Coastal Heath and Sydney Coastal Dry Sclerophyll Forest run into Northern Hinterland Wet Sclerophyll Forest, which has higher fuel loads. Wet Sclerophyll Forest (WSF) generally has the highest available bushfire fuel loadings, however the Northern Hinterland has a grassier formation, which would not have as much fuel as the shrubby formation WSF. The Sydney Coastal Dry Sclerophyll Forest has a slightly lower fuel load than the Northern Hinterland WSF. These fuel loadings have been taken from the NSW RFS Comprehensive Vegetation Fuel Loads document, produced in March 2019.

The Sydney Coastal Heath in this location is greater than 2 metres in height and is therefore classified as Tall Heath. This vegetation formation has the highest fuel loading but being a heath variety uses a different bushfire behaviour equation. The heath formation burns extremely hot and very quickly, there is no ladder effect to build up slowly, the vegetation structure is all at one level, and for this reason a fire can travel very quickly through heath vegetation.

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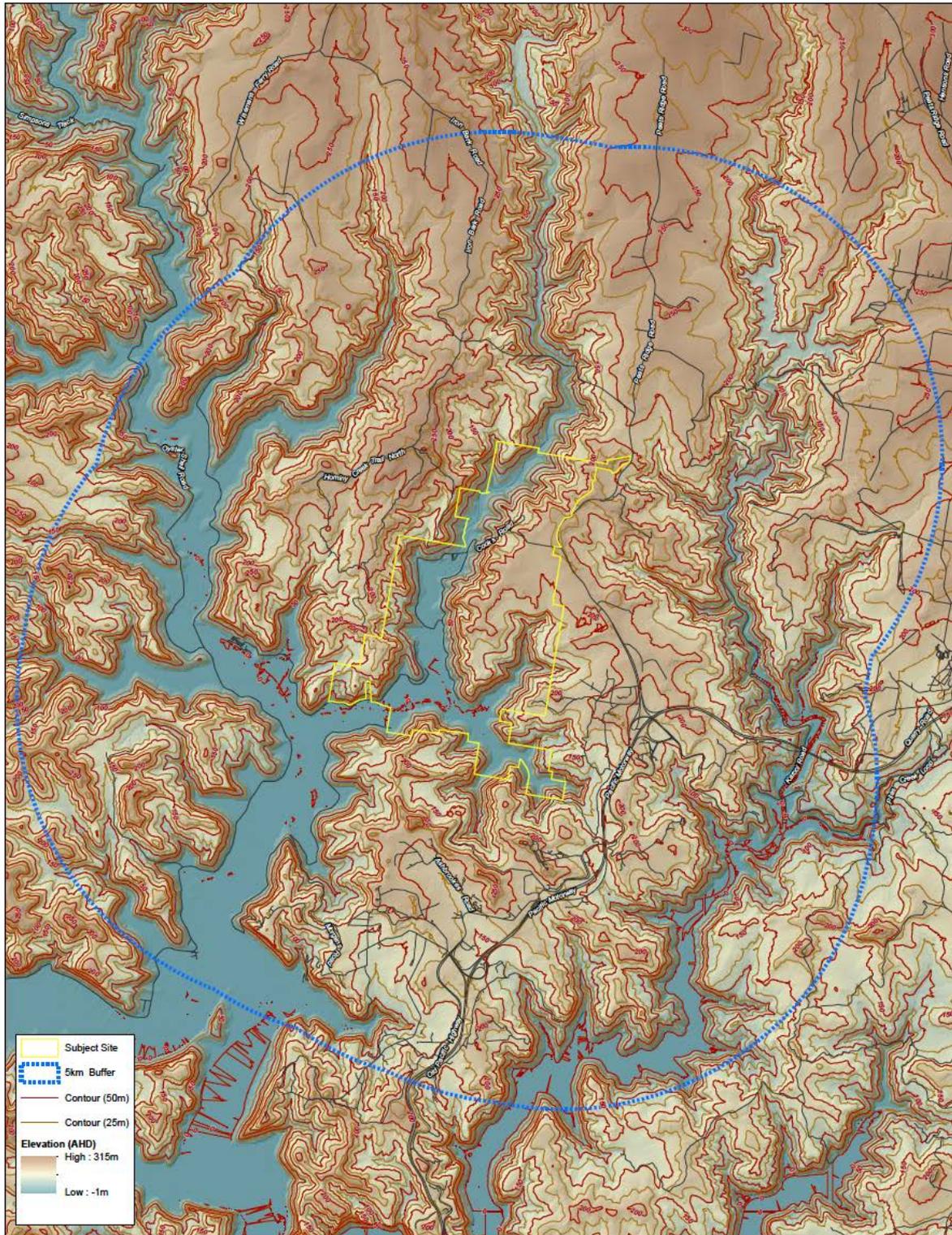
Beyond the Heath and Forest lies an area of agricultural land, situated along Peats Ridge Road to the East. The subject site itself includes a number of discreet pockets of Endangered Ecological Communities (EEC) and regionally significant vegetation.

There is no doubt that this is a very fire prone landscape. But the cleared managed areas on the site itself within the valley floor provide direct contrast to the surrounding fire prone landscape.

4.3 Topography

The landscape within a 5km radius of the site is undulating in nature and rangers from peaks at 200 metres above sea level and troughs of 0 metres above sea level.

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CR Bushfire.	Source: Boundaries: NSW Department of Finance, Services and Innovation 2011 Surface analysis: Derived from GSDP/CRD, 25m/25m 1 metre Resolution Digital Elevation Model © Department of Finance, Services and Innovation 2011	 0 500 1,000 1,500 2,000 Metres A3 Scale: 1:50,000 Coordinate System: GDA 1994 MGA Zone 56	69 Cooks Road Glenworth Valley	Elevation
	Disclaimer: No warranty is given in relation to the data (including accuracy, reliability, timeliness, currency or completeness) and its suitability for any purpose, including without limitation, liability in negligence for any loss, damage or delay (including consequential damage) arising in any use of the data. Data must not be used for direct trading or to which it is subject to the jurisdiction.			
	File: P:\662020\662020_Elevation_Summary_12012015 Date: 19/06/2015			

Figure 8: Topography

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A fire is likely to burn to the ridge tops and then slow down, or even stop, as it burns downhill towards the valley floor. This change in speed might be enough to undertake suppression activities, if this has not already been done. There is a danger of spot fires occurring within the valley floor as embers can travel kilometres ahead of a fire front and be carried by wind. There is an onus to ensure that the valley area is kept as clear as possible of bushfire fuels so that any embers which land within the valley floor do not have chance to take hold and become spot fires.

4.4 Weather and Climate Change

The site lies within the Greater Sydney Fire Weather District and has a Forest Fire Danger Index of 100 for the purposes of PBP 2019. In determining future risk, it is important to understand the type of bushfire events we are planning for. Research carried out by Dr Grahame Douglas in 2017 used a Generalised Extreme Value analysis to extrapolate weather data and project future climatic conditions.

The study produced FFDI values for a 1:50 year recurrence period using the GEV analysis and compared that to the current FFDI used in planning practice. The Sydney and Richmond weather stations are both equidistant to the subject site, with the Sydney weather station being slightly more representative of the subject site location due to its proximity to the coast.

For the Sydney weather station, the determined FFDI was 96 under the study, which is very close to the 100 currently used. For the Richmond weather station, the study identified an FFDI of 112. The current FFDI of 100 used by the NSW RFS for the Greater Sydney Fire Weather District is considered to be appropriate.

4.5 Bushfire History

The Black Summer bushfires of 2019/2020 were the most devastating experienced in NSW and set the new precedent by which to assess strategic planning proposals. Whilst there is little in the way of substantial evidence of climate change, we can be sure that NSW can be subject to events of the scale of those experienced in the Black Summer.

During the 2019/2020 fire season, two fires approached the subject site, the 3 Mile Fire which approached from the North and the Gospers Mountain Fire which approached from the West. Both fires threatened to impact the site but neither fire reached the site itself, stopping on the ridgetops following suppression activities.

The Lost Paradise music festival was due to take place over the new year period from 28 December 2019 to 1 January 2020 and was cancelled due to the ongoing bushfire situation. An emergency management plan had been prepared for the Lost Paradise event by the event organisers which included a Bush Fire Response Plan. The Plan advises early detection and communication of bushfire conditions, including close contact with the NSW RFS Operations Centre each morning to get an update on fire activity in the area. The trigger for cancellation of the event was fire conditions escalating to Extreme or Catastrophic level within December. This did occur and the event was cancelled with messages sent to all event patrons to advise them of the cancellation.

5 Land Use Assessment.

5.1 Proposed additional uses

The uses proposed are all currently operating on site under various existing use rights. The proposal is to add these uses to the uses which are “permitted with consent” under each of the relevant zones as follows:

Table 1: Proposed Additional Permitted Uses per Zone

Zone	Gosford LEP 2014	Proposed Additional Permitted Uses
RU2 Rural Landscape	<p>2. Permitted without consent: Extensive agriculture; Home occupations; Recreation areas</p> <p>3. Permitted with consent: Agriculture; Animal boarding or training establishments; Aquaculture; Bed and breakfast accommodation; Dwelling houses; Environmental protection works; Extractive industries; Farm buildings; Farm stay accommodation; Garden centres; Home-based child care; Home industries; Landscaping material supplies; Open cut mining; Plant nurseries; Recreation facilities (outdoor); Roads; Roadside stalls; Secondary dwellings; Veterinary hospitals; Water storage facilities</p> <p>4. Prohibited: Any development not specified in item 2 or 3.</p>	<p>3. Permitted with consent Eco-tourist facilities, camping grounds, tourist and visitor accommodation.</p>
E2 Environmental Conservation	<p>2. Permitted without consent: Nil</p> <p>3. Permitted with consent: Bed and breakfast accommodation; Dwelling houses; Environmental facilities; Environmental protection works; Home occupations; Oyster aquaculture; Recreation areas; Roads; Water storage facilities.</p> <p>4. Prohibited: Business premises; Hotel or motel accommodation; Industries; Multi-dwelling housing; Pond-based aquaculture; Recreation facilities</p>	<p>2. Permitted with consent: Eco-tourist facilities; Recreation facilities (outdoor)</p> <p>In addition to the uses above:</p> <p>Permitted with consent on cleared land: Extensive Agriculture</p> <p>Permitted with consent on part of cleared land in valley: Camping grounds, function centres</p> <p>Permitted with consent on part of cleared land adjacent to RU2 zoned land:</p>

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	(Major); Residential flat buildings; Restricted premises; Retail premises; Seniors housing; Service stations; Tank-based aquaculture; Warehouse or distribution centres; Any other development not specified in item 2 or 3.	Tourist and visitor accommodation Permitted with consent in multipurpose building: Function centres, entertainment facilities, food and drink premises.
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The proposed additional uses would require a development consent prior to being allowed to proceed, there are no additional uses which would be permitted without consent.

Under the *Rural Fires Act 1997* (RFA) and *Planning for Bush Fire Protection 2019* (PBP 2019), the proposed additional uses fall mostly into the category of Special Fire Protection Purpose (SFPP) development. PBP provides performance criteria for the proposed additional uses as follows:

Table 2: Classification of Bushfire Protection Requirements for Proposed Additional Permitted Uses

Proposed Additional Permitted Use	Requirements of PBP 2019
Eco-tourist facilities	RFA defines a hotel, motel or other tourist accommodation as SFPP. Eco-tourist facilities are not a type of tourist development under Standard Instrument Principle Local Environmental Plan. Nevertheless, PBP 2019 includes Ecotourism as a SFPP use, despite the fact that it is not explicitly defined as Tourist accommodation. Performance Criteria and Acceptable Solutions provided by variations in Table 6.8 a, b, c and d.
Camping grounds	RFA defines a hotel, motel or other tourist accommodation as SFPP. Performance Criteria and Acceptable Solutions provided by variations in Table 6.8 a, b, c and d.
Tourist and visitor accommodation	RFA defines a hotel, motel or other tourist accommodation as SFPP. Performance Criteria and Acceptable Solutions provided in Table 6.8 a, b, c and d.
Recreation facilities (outdoor)	Recreation facilities (outdoor) are defined by the Standard Instrument Principal Local Environmental Plan as a building or place used predominantly for outdoor recreation. Not SFPP as defined by RFA. No requirements in PBP 2019 for Recreation facilities so an appropriate package of bushfire protection measures would be required.
Extensive Agriculture	Not defined as SFPP by RFA. No requirements in PBP 2019. Unlikely to be any bushfire protection requirements unless the use employs significant numbers of staff.
Function Centres	Not defined as SFPP by RFA. No requirements in PBP 2019.

CR Bushfire.

	Bushfire protection measures required based on number of people accommodated at any one time by the centre.
Entertainment facilities	Not defined as SFPP by RFA. No requirements in PBP 2019. Bushfire protection measures required based on number of people accommodated at any one time by the centre.
Food and drink premises	Not defined as SFPP by RFA. No requirements in PBP 2019. Bushfire protection measures required based on number of people accommodated at any one time by the centre.

The purpose of this report is not to specifically assess each of the uses for their compliance with Planning for Bush Fire Protection 2019, but more to establish their suitability within the subject site. It is important to remember here that the uses proposed are already established on the site and the formalisation of the uses presents a unique opportunity to introduce an appropriate package of bushfire protection measures and ensure that any future development can be compliant with PBP 2019.

Many of the uses on site have been subject to development approvals issued in consultation with the NSW RFS. As such, these uses are already compliant with PBP 2006. The motel containing 3 units and 4 separate caravan site has been approved subject to asset protection zones (APZs) to the South and South-West of 100m and BAL-12.5 construction. The multi-purpose function centre also has APZs of 100m and a construction level of BAL-12.5 The function centre has also previously been assessed to be compliant with the requirements of the Neighbourhood Safer Places Guidelines and can accommodate up to 500 people as a place of last resort.

There are also large areas of the cleared valley floor which have been previously assessed to meet the requirements of the NSP Guidelines. Due to the existing use of the facility for music and camping events which accommodate up to 15,000 people, the NSP appropriate areas have been determined to accommodate this number of people.

- Northern end paddock: 38,700 m2*
 - Middle paddock: 21,900 m2 & 380 m2*
 - Southern end paddock 35,300 m2 & 190 m2*
- *taken from Australian Bushfire Consulting Services, 2020

5.2 Future uses

Due to the large, cleared areas on site, there is no reason why any future development could not meet the acceptable solutions for APZs within PBP 2019. For ecotourism and camping, access would need to be provided in compliance with property access requirements. The 6m wide Popran Road access would meet these requirements, assuming that the curves within the road can meet the minimum inner radius requirement of 6m.

For any ecotourism uses, a refuge building would need to be provided which has an SFPP APZ and direct access to the road. The refuge would need to be constructed to BAL 12.5, clearly signposted and all accommodation must be within 100m of the refuge building.

Any bushfire protection package developed for the use of function centres or entertainment facilities would be based on the number of people using each of the facilities and the number of people on site at any one time. Again, the key measure here is ensuring that the access can cater for an evacuation of

CR Bushfire.

the facilities and, in the event that evacuation is not possible, that there is enough space for people to shelter on site in a cleared area that meets the requirements of a Neighbourhood Safer Place.

The Popran Creek provides a water supply which runs through the site and can be drafted for firefighting purposes when necessary. I would recommend a few static water supply tanks be installed to cater specifically to the tourism uses on site and provide a dedicated firefighting resource which is easily accessible to firefighting vehicle. The volume of the tanks should represent the scale of facility they serve but should be 5,000 litres each as a minimum.

A Bushfire Emergency Evacuation and Management Plan would be required for any future uses on site and is also recommended for the existing uses subject to this planning proposal. The landowner is particularly motivated to ensure that each event has the appropriate planning mechanisms in place. As part of the planning proposal, it would be beneficial to establish formally the management arrangements for each of the uses on site. Given that the accommodation and facilities would mostly be occupied by tourists and visitors who may need assistance evacuating or sheltering in appropriate places on site, it is imperative that there is a framework within which to do this.

It is a recommendation of this report that, to properly assess any development applications for future uses, the Bushfire Emergency Evacuation Management Plan be updated to account for the proposed new use and submitted with any future development applications.

5.3 Bush Fire Risk

It is important to establish the bush fire risk profile for each of the uses within the bushfire risk context established by the landscape assessment. This can be done utilising the National Emergency Risk Assessment Guidelines (NERAG) Handbook (AIDR 2015, updated 2020) and the NSW RFS Bush Fire Risk Management Plan Guidelines.

Following the NERAG guidance, the landscape assessment helps us to establish the context and identify the risk. The analysis of that risk and evaluation can be achieved by application the Bush Fire Risk Management Guidelines. The risk to the site is calculated by determining both the likelihood and consequence to the asset of bushfire occurring.

Likelihood

The likelihood of a bushfire occurring is calculated utilising Figure 7 below.

LIKELIHOOD	ANNUAL EXCEEDANCE PROBABILITY (AEP)	AVERAGE RECURRENCE INTERVAL (ARI) (INDICATIVE)	FREQUENCY (INDICATIVE)
Almost certain	63% per year or more	Less than 1 year	Once or more per year
Likely	10% to <63% per year	1 to <10 years	Once per 10 years
Unlikely	1% to <10% per year	10 to <100 years	Once per 100 years
Rare	0.1% to <1% per year	100 to <1000 years	Once per 1000 years
Very rare	0.01% to <0.1% per year	1000 to <10,000 years	Once per 10,000 years
Extremely rare	Less than 0.01% per year	10,000 years or more	Once per 100,000 years

Figure 9: Likelihood Level taken from NERAG 2020

The likelihood of a bushfire approaching Glenworth Valley Outdoor Adventures has been assessed as being Likely. The bushfire history for the facility shows that it was threatened by two major bushfires during the 2019/2020 'Black Summer' fire season – the 3 Mile Bushfire and the Gospers Mountain

CR Bushfire.

Bushfire. Both fires were controlled by active suppression and neither fire encroached onto the property.

The site is situated within a high-risk landscape, surrounded by forest on all sides. It would be difficult to argue that the possibility of another fire occurring in the landscape is 'unlikely'. There has been no reoccurrence of fires in the landscape surrounding the site during the 2020/2021 season and therefore it is not 'almost certain' that a fire would occur in less than 1 year.

Consequence

The consequence level is determined by calculating the threat level and vulnerability of the asset.

The threat level is determined by carrying out a bushfire threat level assessment using the vegetation category, slope category and separation distance. As this is a landscape scale assessment, assumptions have been made regarding the overall vegetation category, slope category and separation distance. The landscape surrounding the site slopes away from the site and has varied topography, the vegetation is forest. The landscape within the site is a flat valley floor with grassland vegetation which is kept managed. Due to the large distances on site, it is possible to locate uses with large asset protection zones larger than 60 metres. Based on the on-site characteristics, the threat level is assessed as 'low'. Should any assets be placed less than 60 metres from the forest vegetation, the threat level would increase.

The vulnerability is based on the susceptibility of an asset to the adverse effects of a bush fire. The facility can be categorised as a Special Fire Protection Purpose (SFPP) use. Whilst not all of the assets on site are SFPP, the site as a whole is a tourist destination which makes it an SFPP facility. Vulnerability is divided into three categories – low, moderate and high. SFPP assets will never be assessed as low vulnerability.

There are examples given for each category in the Bush Fire Risk Management Guidelines. The facility has been categorised as having between a Moderate and High vulnerability. For vulnerability levels, refer to Table 5.1, Bush Fire Risk Management Plan Guidelines. The aim through this planning proposal is to reduce the vulnerability level of the development to moderate, one way to do this is to ensure that there is an emergency management strategy formalised for the site. In allowing uses to be permissible with consent, it also provides the opportunity to ensure that future assets can be better prepared through conditions of development consent. The access and egress are also a key part of the vulnerability assessment and are studied within Section 5 of this report.

Using the table below (taken from the Bushfire Risk Management Plan Guidelines), the consequence rating applied to the facility is 'Minor' to 'Moderate'. Using the measures described above, the consequence would be more on the 'Minor' side.

Threat \ Vulnerability	Low	Medium	High	Very High
High Vulnerability	Moderate	Major	Catastrophic	Catastrophic
Moderate Vulnerability	Minor	Moderate	Major	Catastrophic
Low vulnerability	Minor	Minor	Moderate	Major

Figure 10: Consequence Assessment Table (taken from Bushfire Risk Management Plan Guidelines)

The consequence level needs to be verified against Table 4.1 within the Bushfire Risk Management Plan Guidelines. The uses proposed above are all of a tourist/visitor nature and the consequence level 'Moderate' has been selected to err on the side of caution, based on the characteristics of the use as

CR Bushfire.

follows (to see the characteristics of consequence ratings, refer to Table 4.1 Bush Fire Risk Management Plan Guidelines):

- There may be medical treatment required and some hospitalisation due to possible smoke inhalation, but due to the wide-open spaces on site, no fatalities.
- People do not live at the facility so would not be displaced by the event for more than 24 hours.
- Personal support would be required which would be achieved through local arrangements.
- There would be localised damage to assets which would be rectified by the owners of the facility.
- The community would not be impacted, other than some inconvenience in providing support.
- The local and regional economy could be affected due to the significance of the facility. It may take some time for the facility to recover, and financial assistance may be required.
- There are no native species on site which would be impacted by bushfires.

When the consequence and likelihood are plotted against each other, the risk level can be calculated.

LIKELIHOOD	CONSEQUENCE LEVEL				
	INSIGNIFICANT	MINOR	MODERATE	MAJOR	CATASTROPHIC
ALMOST CERTAIN	Medium	Medium	High	Extreme	Extreme
LIKELY	Low	Medium	High	Extreme	Extreme
UNLIKELY	Low	Low	Medium	High	Extreme
RARE	Very low	Low	Medium	High	High
VERY RARE	Very low	Very low	Low	Medium	High
EXTREMELY RARE	Very low	Very low	Low	Medium	High

Figure 11: Qualitative Risk Matrix taken from NERAG 2020

The risk level to the site is therefore rated under the Bushfire Risk Management Plan Guidelines as 'High'.

This planning proposal provides an opportunity to improve the Bushfire Risk Management ratings of the development. The goal through the planning proposal is to reduce the Consequence level to a level As Low As Reasonably Practical (AIDR Land Use Planning Handbook 2020). In this case, the targeted consequence level is 'Medium'.

6 Access and Egress.

Access to and from the main tourist and events area within the valley floor is served by multiple access roads in a complex network of access options.

The primary access to the site is taken from Cooks Road, which is located approximately 3km north of the M1 Motorway along Peats Ridge Road. Once on Peats Ridge Road, occupants of the facility can head either North along Peats Ridge Road towards Central Mangrove or South towards the Calga interchange of the M1 Motorway. Once they have reached the M1 Motorway, occupants can travel in a Northerly direction towards Gosford (via A49) or in a Southerly direction towards Mount White, Mooney Mooney and Sydney. There are many options within the road network to move away from approaching bushfires and find shelter.

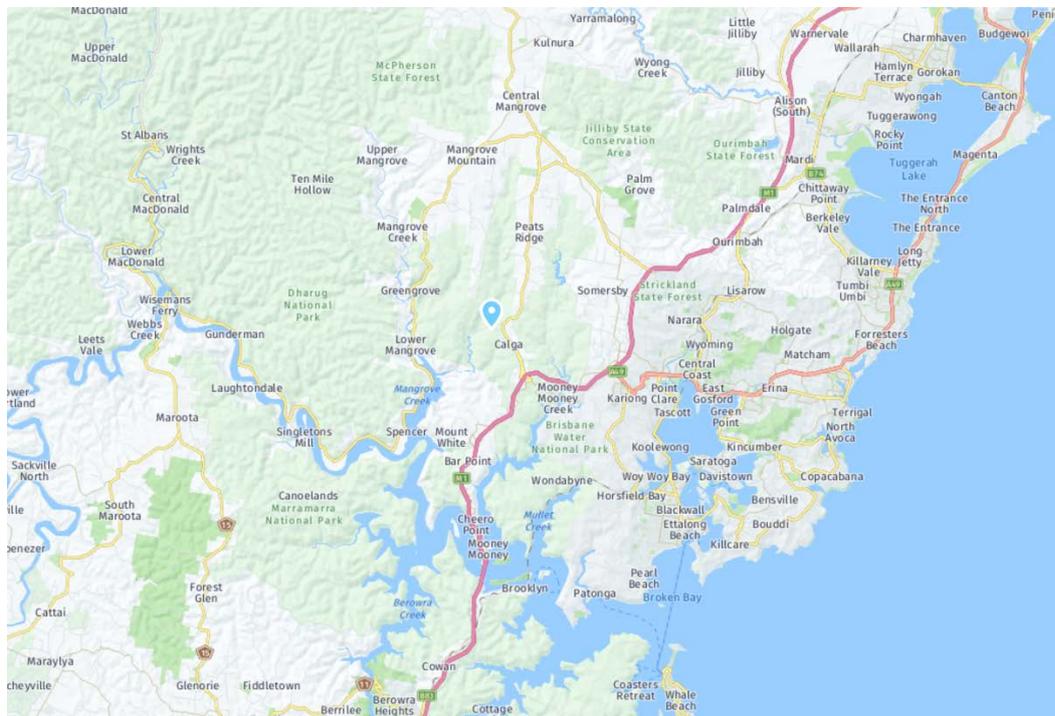


Figure 12: Map showing general directions of travel from GV Outdoor Adventures

Much of the wider road network is surrounded by National Park and other significant vegetation and is at high bushfire risk. However, there are enough options within the road network that decisions can be taken based on bushfire conditions as to which direction to send occupants of the facility in. Any potential closure of the M1 Motorway based on smoke or fire conditions would need to be taken into consideration within a Bushfire Emergency Evacuation and Management Plan.

Cooks Road is a dual lane all weather access road, which meets the acceptable solutions of Planning for Bush Fire Protection 2019. Wayne Tucker notes in his September 2020 report that the road is regularly traversed by heavy vehicles and has been used previously by Category 1 Fire Appliances. This road is dual lane for approximately 500m before descending into the valley floor via an access road with 6m wide kerb to kerb which is also accessible by Category 1 fire fighting vehicles.

The primary emergency evacuation route would be Cooks Road which provides the fastest exit from the site towards Peats Ridge Road and the M1 Motorway. There are two alternative, or secondary, access roads which can be utilised in the event of an emergency. Glenworth Valley Road which leads in

CR Bushfire.

a southerly direction via Mount White to Wendoree Park, the road can be upgraded for use with some minor maintenance work. Popran Road which leads in a south westerly direction to Wisemans Ferry Road.

Glenworth Valley Road is a formal right of way which originates at Glenworth Valley and ends at Wendoree Park. Some maintenance work may be required to this route in order to have the certainty that it is a realistic access route. Popran Road would not however require the same level of maintenance. When a bushfire emergency management plan is created, the access routes should be inspected to determine their trafficability by different kinds of vehicles. A full plan should then be created to determine appropriate access and egress routes in a bushfire emergency.

There are, altogether, three different directions of travel which allows for different directions of approach of any bushfire. Should one of the access roads be inaccessible due to fire or smoke, there are realistic directions of travel away from that particular access road. This is a significant advantage in this location and from a strategic perspective, there are good access options available. There would need to be emergency management actions put in place via a bushfire emergency evacuation plan to ensure that visitors to the site are aware of bushfire conditions and are guided in making the right choice of evacuation route, based on bushfire conditions.

All access roads within the site do travel through dense bushland and this would need to be taken into consideration in a bushfire emergency management plan.

There are also internal access routes which are utilised in the planning of large events to ensure good traffic circulation around the site. There is a main access loop road around the northern portion of the valley, with various bridge connections. Bridges have been deemed suitable for use by Category 1 Fire Appliances (Tucker, W 2020). There are also two roads either side of Popran Creek in the southern portion of the valley. These roads are also connected via bridges, which are suitable for smaller 4WD vehicles to use. These 4WD access routes are used to provide a one-way loop around the site during events. The access routes generally traverse through forested vegetation and would require maintenance to ensure both pass-ability and vertical clearance. The routes used can be seen in Figure 11 below.

CR Bushfire.

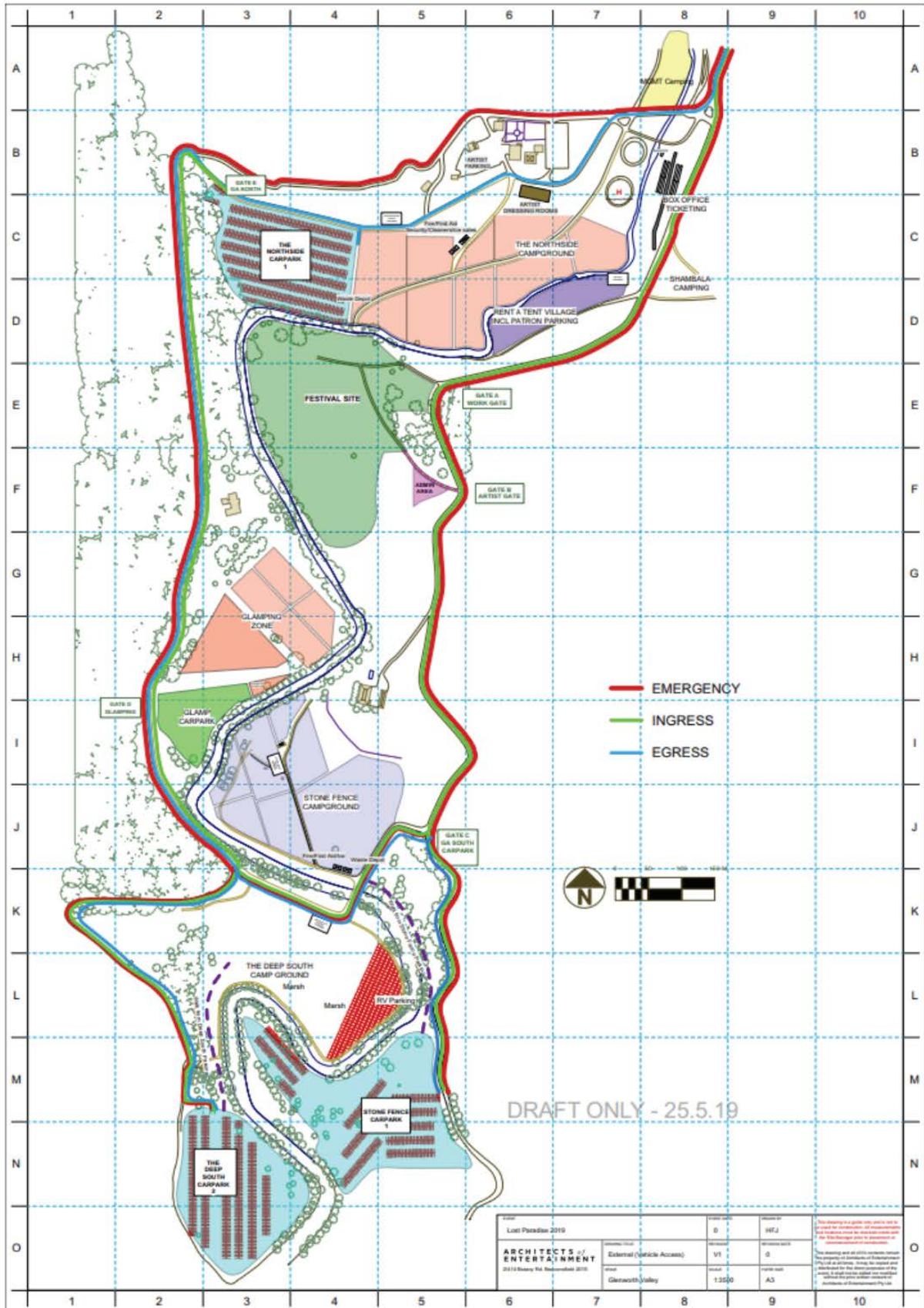


Figure 13: Loop road system used for major events

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Maintenance would be a responsibility of the landowner to ensure that all access routes are trafficable. A site inspection was carried out by CR Bushfire on 26 March 2021 whereby maintenance to the access routes was observed to be taking place. The landowner is committed to ensuring access routes are kept trafficable and clear of vegetation to support the businesses operating on site.

One key consideration for a Bushfire Emergency Management Plan is the timing for visitors or occupants of the site to evacuate in the event of a fast onset bushfire event. Google Maps estimates that it is approximately a 7-minute drive for one car from the existing multi-function centre to Peats Ridge Road. Where there are additional vehicles evacuating simultaneously, this will add additional time.

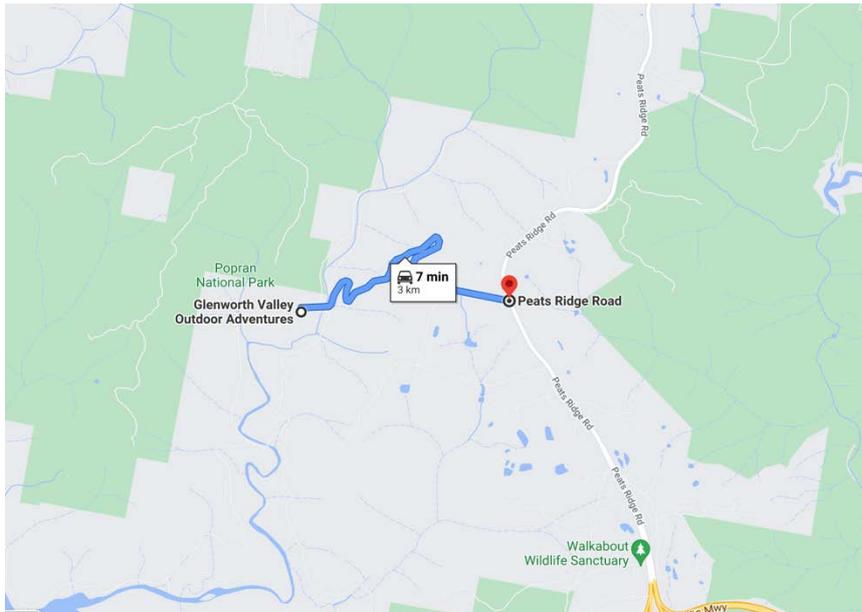


Figure 14: Estimated driving time from multi-function centre to Peats Ridge Road

The use of open spaces on site alongside the multi-function centre as a place of last resort option should also be a key consideration of the Bushfire Emergency Management Plan. Appropriate assembly areas for different occupancy levels should be incorporated into the Plan.

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7 Emergency services, Infrastructure and Adjoining Land.

Emergency Services

There is a NSW RFS Fire Brigade located at Kariong, approximately 15 km, or 25 minutes drive away from the subject site. The closest Fire and Rescue NSW station is also located at Kariong, whilst the NSW RFS Fire Control Centre for the Central Coast is located at Arizona Road, Charmhaven.

Glenworth Valley has a good relationship with the local Brigade at Kariong and was in full consultation with them through the development of an emergency plan for the planned Lost Paradise event in 2019/2020. Fire weather updates were provided by the local Brigade, eventually leading to the cancellation of the event due to fire weather conditions.

As this Planning Proposal is required to formalise existing uses, there would be no additional impact to the demand for emergency services. In fact, this Planning Proposal provides a positive opportunity to bring the nationally significant facility to the attention of the Local Emergency Management Committee in developing a Bushfire Emergency Management Plan which brings awareness of the facility to local emergency services.

The nearest Neighbourhood Safer Place (NSP) is located at Bassan Street, Woy Woy Bay, approximately 30 minutes' drive away from the subject site. Travelling to the NSP could potentially be through bushfire prone vegetation. As the NSP would be a place of last resort, it is unlikely that the NSP would be utilised. Instead, it would be safer to retain occupants on the site, where there are areas and a multi-purpose function centre which meet the criteria for an open space NSP.

The 2019/2020 fire season threatened the subject site from two different directions but did not impact the site. The Lost Paradise music festival was due to take place over the new year period but was cancelled due to the onset of fires and predicted catastrophic fire conditions. There is precedent to include the closure of a facility such as this on days of Extreme or Catastrophic fire conditions. This should form part of the bushfire management strategy for the site to reduce the risk to a 'Medium' level.

Infrastructure

The site is not subject to a reticulated water supply in the valley. Popran Creek runs through the length of the valley floor and water can be drafted from dams on site for firefighting purposes. Available firefighting water sources were detailed by Australian Bushfire Consulting Services in their letter of 29 April 2020 as follows:

CR Bushfire.

- 1 x 15,000 L Freightliner bulk water tanker with fire fighting pump for re filling appliances and includes a firefighting hose reel
- 1 x 1100 L fire fighting tanker trailer with fire fighting pump and 50m hose reel
- 1 x 1000 L slip on ute tanker, fire fighting pump and twin 50m hose reels
- 1 x 1000 L water trailer tanker with fire fighting pump and twin 200m retractable hose reels
- 1 x 1000 L agricultural spot spraying tractor trailer unit with PTO pump and 50m hose reel
- 2 x 15 L fire fighting spot spraying back packs
- 2 x 3" NSWFB approved fire hydrants at our Event Centre Building powered by twin automatic start, diesel pumps (with storz fitting adaptors for RFS refill purposes). Provides 10 L /sec flow. Water supply from 750,000 litre dedicated in ground earth tank with water level topped up by automatic float switch from onsite reticulated water supply fed by 3 x 375,000 water tanks fed by onsite bores and natural springs.
- 3 x 375,000 water tanks fed by onsite bores and natural springs reticulated throughout the property with 12 hydrant outlets throughout the property.
- 1 x 100,000 L stainless steel water tank supply with twin 3" bulk water refill hoses and storz fittings to match for RFS refill purposes
- 3 x 25,000 L concrete water tanks located throughout the property for onsite appliance and RFS refill purposes.
- Numerous permanent dams and tidal creek water with suitable access for water refill purposes.

Figure 15: Water supply facilities taken from ABCS Letter

The existing water facilities on site are adequate to support firefighting operations on site. As demonstrated by the 2019/2020 fire season, water supplies on site can also be used to undertake water bombing suppression activities within the landscape surrounding the site.

Previous approvals for uses on site, including the motel and caravan sites and the multi-purpose function centre include conditions of consent that water supplies must be compliant with PBP 2006. A minimum 20,000 litre supply should be provided for tourism-related activities. Any future development application for uses on the site would need to provide individual water supplies for each facility. In total, there is an excellent water supply for firefighting operations on the site.

Adjoining Land

The subject site is not located in close proximity to other facilities or residential development. As an existing facility and formalisation of existing uses, there is not likely to be any negative impact on adjoining land resulting from the Planning Proposal.

8 Recommendations.

Based on the results of the Bushfire Strategic Study, the Planning Proposal represents a good opportunity to introduce modern bushfire protection measures to a facility currently operating, primarily, under existing use rights with little to no formal bushfire protection. Should the planning proposal not go ahead, the uses will continue to operate with an inferior standard of bushfire protection in place. With appropriate mitigation, the bushfire risk to the site can be reduced to a level which is 'As Low AS Reasonably Practicable', thereby meeting the requirements of national level guidance.

The bushfire risk in the landscape surrounding the site is determined by the study to be 'High' with no mitigation. This is partly due to the length of the access and the potential time required for evacuation. Nevertheless, the existing uses on site are compliant with PBP, including APZs of 100m and BAL-12.5 construction. Water supply on the site is excellent, with numerous sources of water identified for firefighting purposes.

The following measures are proposed in order to achieve the ALARP principle and reduce the Bush Fire Risk level of the existing uses to a 'Medium' level.

- The development of a Bushfire Emergency Evacuation Management Plan – to include a full assessment of the access options and the consideration of open areas of the valley floor and the multi-purpose centre as places of last resort.
- Full consultation with NSW RFS Central Coast Fire Control Centre over early communication in the event of bushfires and emergency management protocol.
- Communicating the emergency procedures to visitors to the site by way of signage within facilities to alert visitors to the bushfire risk and the proposed evacuation measures.
- Investigation of the upgrading of Glenworth Valley Road as an alternative access option subject to owners consent and appropriate legal agreements.
- Potential closure of the facility on days of Catastrophic fire weather conditions, or as advised by the NSW RFS. This should be undertaken as early as possible and in full consultation with the NSW RFS Central Coast Fire Control Centre.
- Consideration to holding events outside of the bushfire danger period wherever possible.
- All future development applications for uses on site under the proposed amended zoning to be compliant with PBP 2019.
- The Bushfire Emergency Evacuation Management Plan be updated for any proposed new use on site and submitted with all future development applications.

The provision of the above recommended measures, along with the existing features on site such as existing access and water supplies, also meet the requirements of Ministerial Direction 4.4. in accordance with Section 9.1 of the *Environmental Planning and Assessment Act 1979*.

The owner of Glenworth Valley Outdoor Adventures has demonstrated a real commitment to achieve good bushfire protection on site, engaging numerous bushfire consultants to prepare reports and ensuring that maintenance is continuous on site.

Should the Planning Proposal move forward to approval, appropriate mechanisms for implementation of these measures should be identified. The overall outcome of an approved Planning Proposal with these measures incorporated is a nationally significant facility with a high-quality bushfire protection system.

References.

1. Bushfire Assessment Report, Multi-Purpose Centre amendment to planning proposal, 6 September 2020, Australian Bushfire Consulting Services
2. Letter Re: Glenworth Valley Outdoor Adventures, 29th April 2020, Australian Bushfire Consulting Services
3. Letter Re: Planning Proposal, 24th June 2015, Building Code & Bushfire Hazard Solutions
4. Lost Paradise Event Safety Management Plan, 2019, Platinum Event and Risk Services
5. Traffic Management Plan for Lost Paradise, 2018, Vigilant safe services
6. Planning for Bush Fire Protection, 2019, NSW Rural Fire Service
7. Planning for Bush Fire Protection, 2006, NSW Rural Fire Service
8. Land Use Planning for Disaster Resilient Communities, 2020, Australian Institute for Disaster Resilience
9. National Emergency Risk Assessment Guidelines, 2020, Australian Institute for Disaster Resilience
10. National Land Use Planning Guidelines for Disaster Resilient Communities, 2015, Planning Institute of Australia
11. Bushfire Risk Management Planning Guidelines, NSW Rural Fire Service

Appendix A.

Letters from NSW RFS.



NSW RURAL FIRE SERVICE



The General Manager
Gosford City Council
PO Box 21
GOSFORD NSW 2250

Your reference: 14179107
Our reference: L14/0004

10 February 2016

Attention: Bruce Ronan

Dear Sir/Madam,

Planning Proposal - Glenworth Valley and Calga

Reference is made to Council's correspondence providing further information for consideration in relation to the above planning proposal.

The New South Wales Rural Fire Service (NSW RFS) has considered the further information provided by the proponent's bush fire consultants addressing the matters raised in our previous correspondence and discussed at an onsite meeting. This information included further details of the historical use of the site for outdoor recreational activities and potential bush fire protection measures that could be put in place to support future uses.

Based on this information, the NSW RFS advises that it no longer objects to the planning proposal subject to future development proposals complying with the provisions of *Planning for Bush Fire Protection 2006* (PBP), particularly the provision of Asset Protection Zones (APZs), safe access and emergency evacuation management.

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

Yours sincerely,

Nika Fomin
Manager, Customer Service and Support Centre East

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NSW Rural Fire Service
Records Management
Locked Bag 17
GRANVILLE NSW 2141

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NSW Rural Fire Service
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NSW RURAL FIRE SERVICE

Central Coast Council
PO Box 20
WYONG NSW 2259

Your reference: PP 38/2013
Our reference: SPI20201214000209

ATTENTION: Bruce Ronan

Date: Friday 8 January 2021

Dear Sir/Madam,

Other - Planning Proposal

Planning Proposal to Allow Additional Permitted Uses - Glenworth Valley

I refer to your correspondence dated 08/12/2020 regarding the above proposal.

The New South Wales Rural Fire Service (NSW RFS) has considered the information submitted and provides the following comments:

A review of the proposal with regard to the directions issued in accordance with Section 9.1 of the *Environmental Planning and Assessment Act 1979* has been undertaken.

The objectives of the direction are:

- (a) to protect life, property and the environment from bush fire hazards, by discouraging the establishment of incompatible land uses in bush fire prone areas, and
- (b) to encourage sound management of bush fire prone areas.

The direction provides that a planning proposal must:

- (a) have regard to Planning for Bushfire Protection,
- (b) introduce controls that avoid placing inappropriate developments in hazardous areas, and
- (c) ensure that bushfire hazard reduction is not prohibited within the APZ.

The referral relates to a Planning Proposal to allow the addition of the following additional permitted uses within the subject site proposal as follows:

- On land zoned RU2 Rural Landscape, the additional permitted uses of eco-tourist facilities, camping grounds, tourist and visitor accommodation;
- On land zoned E2 Environmental Conservation, the additional permitted uses of eco-tourist facilities and recreation facilities (outdoor).
- On existing cleared areas of land zoned E2 Environmental Conservation, comprising part of Lots 19, 20, 21, 23, 25, 30, 32, 33, 37, 50, 53, 64, 68, 85, 86, 87, 89, 91, 108 and 145 DP 755221, part of Lots 22 and

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32 DP 755253 part of Lot 3 DP 617088, part of Lot 245 DP 48817 and part of Lot 7303 DP 1154929, development for the purpose of extensive agriculture.

- On existing cleared areas of land zoned E2 Environmental Conservation, comprising part of Lots 19, 37 and 89 DP 755221 and part of Lots 22 and 32 DP 755253, development for the purposes of camping grounds and function centres.
- On existing cleared areas of Lot 108 DP 755221 and Lot 145 DP 755221, development for the purposes of tourist and visitor accommodation.
- On land comprising part of Lot 89 DP 755221 which currently accommodates the multi-purpose building:
 - development for the purposes of function centre, entertainment facility and food and drink premises, and
 - the total floor area for the function centre, entertainment facility and food and drink premises, is to be a maximum of 1500m² with any additions being attached to, or directly adjacent to the existing building.

In order for the assessment of the Planning Proposal to progress a Bush Fire Strategic Study that addresses the provisions of Chapter 4 - Strategic Planning of *Planning for Bush Fire Protection (PBP) 2019* must be provided that encompasses entirety of the Planning Proposal.

Given that the proposal encompasses a number of the proposed development types including Special Fire Protection Purpose (SFPP) developments, careful consideration must be given to the proposed future locations of these activities with regard to the vulnerability of occupants to bush fire attack and the isolated nature of sections of the subject site.

The NSW RFS holds concerns regarding the cumulative impacts of the proposed additional permitted uses in relation to, but not limited to, access with the proposed location of future SFPP developments within isolated areas with poor access and egress provisions that would have the potential to be cut off in the event of a bush fire. As such, the Bush Fire Strategic Study is required to include a hazard study that includes the broader locality to ensure infrastructure within the subject site and wider area is adequate to support future SFPP development in the area.

It should also 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).

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
Manager Planning & Environment Services
Planning and Environment Services