

Central Coast Council
PO Box 20
Wyong NSW 2259

Your Reference: PP 38/2013
Our Reference: 020_Glenworth Valley

Attention: Bruce Ronan

Dear Sir/Madam,

We acknowledge receipt of the NSW Rural Fire Service (RFS) letter dated 9 September 2021 and write in response to the comments raised.

Glenworth Valley Outdoor Adventures (GVOA) is a multi award winning tourist facility that has been in operation for over 50 years. On a number of occasions over this period, including as recently as a month ago, GVOA has been the successful recipient of various competitive government tourism funding grants, totalling in the millions of dollars. This support has largely occurred due to the significance and importance of GVOA to the tourism industry where they are widely recognised by Destination NSW, Tourism Australia, Central Coast Council and the NSW Department of Planning as a highly successful tourist facility of state significance. The owners of GVOA have a long history of meeting all obligations and responsibilities to ensure that visitors to the site are afforded appropriate bushfire protection to ensure their safety.

Whilst we understand that the RFS has concerns with the *impacts of the projected numbers of people within the subject area*, we would like to stress that the previous almost identical planning proposal submitted in 2016 was supported by RFS with *no objections raised*. This planning proposal, which is a resubmission of the 2016 approval, is specifically in relation to maintaining and formalising the existing historical land uses, including the existing number of people, within the subject site. That is, for the purposes of agriculture, camping, food and drink premises, function centre and entertainment facility, tourist and visitor accommodation, ecotourism and as a recreation facility outdoors.

This planning proposal does not include music festivals where there are temporarily larger than normal numbers of attendees to the site, nor does it require consent for future development of this type to continue to occur on the site. Music festivals have already been subject to multiple modification approvals, as indicated below in Table 1.

It must be stressed that there is currently no proposal for any additional future uses to occur on the site and, as such, it is impossible to project future use or associated future site capacity. Any development proposed in addition to those already existing will be subject to the development application process and assessment of specific bushfire requirements in accordance with *Planning for Bushfire Protection (2019)* at the time of lodgement. In this case, the strategic assessment is only required to determine the appropriateness of existing uses on site, which this planning proposal would establish as permitted uses, rather than being prohibited and subject to existing use rights, as is currently the case.

Table 1: Previously approved events.

Date	Decision	Description
01/06/1999	Approved	Music Festival and Camping purposes for 10,000 people for up to 72 hours continuous duration for up to 2 events per annum.
23/03/2003	Approved	Approval for Music Festival and Camping purposes for 10,000 people for up to 72 hours duration for up to 3 events per annum.
14/11/2005	Approved	Approval for Music Festival and Camping purposes for 15,000 people for up to 72 hours duration for up to 3 events per annum.
03/09/2007	Approved	Approval to Music Festival and Camping purposes for 15,000 people for up to 80 hours duration for up to 3 events per annum.
15/06/2009	Approved	Approval for Music Festival and Camping purposes for 15,000 people for up to 80 hours duration for up to 3 events per annum additional allotments added.
11/08/2012	Approved	Approval for Music Festival and Camping purposes for 15,000 people for up to 80 hours duration for up to 3 events per annum operational changes.
17/01/2013	Approved	Approval for Music Festival and Camping purposes for 15,000 people for up to 80 hours duration for up to 3 events per annum starting and finishing times.
02/08/2005	Approved	Non profit Community Events for up to 2,500 people for 72 hours in duration for up to 2 events per annum.
23/07/2009	Approved	Non profit Community Events for up to 2,500 people for 72 hours in duration for up to 2 events per annum, various changes and modifications.
02/07/2013	Approved	Recreation Facility and Equestrian Events for up to 10,000 people for up to 2 events per year.
13/08/2014	Approved	Recreation Facility and Equestrian Events for up to 10,000 people, for up to 2 events per year in an amended location.
05/07/2021	Approved	Festivals and Events for up to 10,000 people on up to 28 days per year.

It is important to recognise that the approval of this planning proposal will enable a significantly better bushfire outcome through the adoption of the recommendations in the Bushfire Strategic Study by comparison to the current circumstances.

The following is our response to the latest NSW Rural Fire Service concerns dated 9 September 2021.

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 site operates near 'full capacity' when music festivals are held on-site, however this planning proposal does not include music festival uses and so the question of evacuation of the site at 'full capacity' is not relevant. The principle of evacuation of the site near 'full capacity' has been

demonstrated through previous approvals for music festivals which have been subject to extensive consultation and input from RFS and other relevant government authorities.

Evacuation of existing uses in an adequate and timely fashion is subject to occupant numbers and location in relation to recreational activity (for example cabin stays in the top section of the property versus horse riding in the valley floor).

As a minimum given the recommended speed limit of the main access road into the valley is 25km/hr and the length is approximately 2.2km's, it has been timed to take less than five minutes for one car to exit from the valley floor onto Peats Ridge Road.

On the other extreme if we look at what happens in a real-life situation when a music festival occurs with some 15,000 people (a capacity clearly outside of the projections for existing uses), and use historical anecdotal evidence on departure times, it takes less than 5 hours to fully evacuate the site. Relocation times would be expected to be significantly less than this, however, in response to a bush fire evacuation under the control of fire wardens. This evacuation time frame has already been accepted in the approval of previous development applications for music festivals with a capacity of 15,000 people on the site and is well over and above the evacuation time that would be required for the existing uses which are the subject of this planning proposal.

To improve evacuation time frames Council is currently considering a request to upgrade the intersection of Cooks Road and Peats Ridge Road with a dedicated pull out / slip lane to be created onto the dual lane Peats Ridge Rd, which will significantly further reduce traffic evacuations times and improve traffic management from the site.

Triggers that will identify evacuation or shelter in place actions will be proposed in the Bushfire Emergency and Evacuation Management Plan and will be based on different fire scenarios, predicted on the basis that *fires from the west are common in the area*, as indicated in the RFS letter dated 9 September 2021. In summary, the strategy for emergency management of the existing uses subject to this planning proposal will be:

Primary Response – Closure of the facility and cancellation of any events on days of Extreme or Catastrophic Fire Danger or as advised by the Central Coast RFS District Office prior to any bushfire approaching the site.

Secondary Response – Evacuation of all occupants on site following emergency management protocols which will be set out in the Bushfire Emergency Management and Evacuation Plan on advice from Central Coast RFS District Office or where local fire activity unexpectedly increases.

Last Resort Response – Shelter on-site within existing Multipurpose building.

- ***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.***

Triggers for the closure of the subject site to visitors, which would be included in the recommended Bushfire Emergency Evacuation Management Plan, would include the following:

- Issue of an Extreme or Catastrophic Fire Danger rating by the Bureau of Meteorology or deteriorating fire weather conditions; and/or
- Advice from Central Coast District Office to close the facility; and/or
- Increasing fire activity, spotting and spread in bushland within 30 kilometres of the facility.

As an example of Glenworth Valley's response to bush fire protection, closure of the site occurred twice during the 2019/2020 Black Summer fire season when the Three Mile and Gaspers Mountain fire complex threatened assets 12km away. The first was the cancellation of the Tough Mudder obstacle course and running event scheduled to occur on the 16th and 17th of November 2019 and the second was the cancellation of the Lost Paradise Music Festival scheduled to occur over the 2019 new year period.

Should a fire start and spread unexpectedly on days of lesser fire danger than that listed above, Glenworth Valleys Bushfire Emergency Evacuation Management Plan will be enacted with procedures for the evacuation of occupants undertaken. As a last resort option, a shelter in place strategy would be enacted for any occupants remaining within the subject site when advice is provided by the Central Coast RFS District Office that it is too late to evacuate. This is discussed further below.

Each existing land use would carry a different set of procedures and will be investigated and assessed at the time of preparation of the Bushfire Emergency Evacuation Management Plan.

- ***A cap on the 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 number of users of the subject site currently sits at 15,000 people per day as this is the maximum capacity approved under the Development Application 2839/1999 (for music festival purpose lasting up to 4 days in duration).

Evacuation times for this number of people has been discussed above.

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

In accordance with the *Neighbourhood Safer Places Guidelines for the identification and inspection of Neighbourhood Safer Places in NSW* a building meets the acceptable solutions if:

- It is situated to prevent direct flame contact, material ignition and radiant heat levels of 10kW/m²; or
- Provides 139 metres separation distance from a bush fire hazard.

The Multipurpose building is constructed to BAL12.5 in accordance with AS3959 Construction of Buildings in Bushfire Prone Areas 2018. It is a two-storey building that has the capacity to accommodate 350 people downstairs and 200 people upstairs, with available water and amenities.

It currently has a distance of 115m to vegetation to the north, 88m to the west, 224m to the east and 223m to the south. Where distances do not meet 139m there is opportunity to manage the vegetation line in order to achieve this.

An assessment using the NBC Bushfire Attack Assessor was also undertaken to predict the radiant heat levels at the northern and western elevations of the Multipurpose building. The results are as follows:

	Northern Elevation	Western Elevation
Vegetation	Northern Hinterlands Wet sclerophyll Forest (Grassy)	Northern Hinterlands Wet sclerophyll Forest (Grassy)
Slope	> 15 degrees Upslope	0 degrees Level
Distance	115 m	88 m
Radiant Heat	1.66 kw/m ²	5.57 kw/m ²

Note: The output radiant heat measured on the western elevation of the Multipurpose building may be considered conservative as the distance to more continuous vegetation west of Popran Road is 144m.

In addition, the multipurpose building also has 2 X 3" NSWFB approved fire hydrants powered by twin automatic start, diesel pumps (with storz fitting adaptors for RFS refill purposes). The system provides 10L/sec flow. Water supply is from a 750,000L dedicated in ground tank with water level topped up by automatic float switch from onsite reticulated water supply fed by 3 x 375,000L water tanks fed by onsite bores and natural springs.

In relation to open space refuge within the subject site, a number of locations were provided previously by Wayne Tucker of Australian Bushfire Consulting Services which identified vast areas where radiant heat levels were compliant with the *Neighbourhood Safer Places Guidelines for the identification and inspection of Neighbourhood Safer Places in NSW*. These locations were the subject of a detailed assessment by the NSW RFS when DA 54251/2018, for Festival and Events for up to 10,000 people, on up to 28 days per annum, was approved by Council on the 5/7/2021.

Despite having large areas of open space, due to the nature of the landscape and the predicted fire weather conditions on the valley floor, the Multipurpose building is considered the primary safe refuge for this planning proposal.

Further to the above it should also be noted that the subject site has a number of fire-fighting resources and trained staff available to stage resources at refuge areas to assist in extinguishing spot fires and minimising intolerable external fire conditions such as heat, smoke and embers.

Resources at Glenworth Valley include:

- 1 x 15,000L Freightliner Bulk Water tanker with firefighting pump for re-filling appliances and includes a 40m firefighting hose reel;
- 1 x 1,100 L firefighting tanker trailer with firefighting pump and 50m hose reel;
- 1 x 1,000 L slip-on ute tanker, firefighting pump and twin 50m hose reels;
- 1 x 1,000 L water trailer tanker with firefighting pump and twin 200m retractable hose reels;
- 1 x 1,000 L agricultural spot spraying tractor trailer unit with PTO pump and 50m hose reel;
- 2 x 15L firefighting spot spraying back packs;
- 3 x 375,000L water tanks fed by onsite bores and natural springs reticulated throughout the property with 12 hydrant outlets throughout the property;
- 1 x 100,000L stainless steel water tank supply with twin 3" bulk water refill hoses and storz fittings to match for RFS refill purposes; and
- 3 x 25,000L concrete water tanks located throughout the property for onsite appliance and RFS refill purposes.

There are also numerous permanent dams and tidal creeks with suitable access for water refill purposes.

- ***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 Bushfire Protection (PBP) 2019.***

As stated previously within the Bushfire Assessment Report by Wayne Tucker of Australian Bushfire Consulting Services the primary access road into Glenworth Valley is a dual lane all weather road that enters via the end of Cooks Road to the east. This road complies with the width (6m wide kerb to kerb) and grade requirements of Table 6.8b PBP 2019 for Special Fire Protection Purpose Developments and as such will not be *problematic for passing of heavy tankers and vehicles*. In fact, this road is regularly traversed by heavy vehicles attending the site during large events, such as Category 1 fire appliances, semi-trailer tankers removing sewerage waste from the site with a GVM of 42 tonnes, semi-trailers and 48 seat buses on multiple occasions.

Alternate access exists in the form of:

- Popran Road (public road) which traverses the subject site in a south westerly direction and connects to Wisemans Ferry Road further west;
- Glenworth Valley Road (public road) which traverses the subject site in a southerly direction and ends at Wendoree Park;
- A 4WD emergency access road, which has recently been used by Category 1 fire appliances which runs from the western end of Cooks Road in a westerly direction and intersects the main entry road close to the valley floor; and
- An internal loop road which connects to all access roads to the valley floor and is suitable for use by Category 1 Fire Appliances.

Due to the location of the site and the nature of the landscape, use of these roads to evacuate occupants at the time of a bushfire will be heavily dependent on fire spread predictions and will only be traversed by vehicles if safe to do so.

In short, if fire is present on the eastern side of the valley, occupants would be directed to shelter in place with the access road closed to prevent use. If fire is present on the western side of the valley its likely spread downhill would be slow and a decision on evacuation or shelter in place would be made dependant on conditions experienced on the day including wind direction and speed, smoke and ember attack and number of occupants based on consultation with the Central Coast RFS District Office.

By having a robust Bushfire Emergency Evacuation Management Plan that identifies triggers for the carrying out of evacuation or shelter in place procedures and by practising response protocols the risk to occupants and emergency service operators will be mitigated.

- ***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.***

Again, as stated earlier, it is acknowledged that each land use would more than likely carry a different set of procedures of emergency response and/or evacuation and is heavily dependent on location in relation to tourist and recreational activity (for example cabin stays versus horse riding in the valley floor).

The appropriate way forward in addressing emergency management of the different activities on the subject site is via the preparation and implementation of a suitable Bushfire Emergency Evacuation Management Plan.

- ***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***

No future developments are proposed and as a result cannot be addressed against the specific requirements within Chapter 6 of PBP 2019.

For those existing uses, current onsite compliance is as follows:

Ecotourist Facilities

There are no proposed or existing ecotourist facilities present on site. As a result, an assessment against the specific requirements within Chapter 6 cannot be undertaken.

Camping Grounds

There are no requirements in PBP 2019 for Asset Protection Zones or Construction Standards for camping grounds. In relation to access there are requirements for "Primitive Camping" in accordance with Table 5.3b which the site currently meets (refer to the Bushfire Strategic Study and responses above). Water supply onsite currently exceeds that requested in Table 6.8c (refer to water supply resources within this response letter). Table 6.8d requires a Bushfire Emergency Management and Evacuation Plan with an appropriate shelter in place refuge. This has been recommended for each land use in the Bushfire Strategic Study which will also address the Multipurpose building as being a shelter in place option.

Tourist and Visitor Accommodation

The existing five cabins that have already been constructed on site have been approved under DA 43465/2013, which approved three motel units and 5 caravan sites (ie relocatable cabins). As the five cabins have been assessed, constructed, and approved in accordance with SFPP requirements under *Planning for Bushfire Protection 2006*, there should be no requirement to re-address their compliance.

Recreation Facilities (outdoor)

There are no requirements in PBP 2019 for Recreation Facilities so an appropriate package of bushfire protection measures would be required. This would include a Bushfire Emergency Management and Evacuation Plan with an appropriate shelter in place refuge which has suitable APZs, adequate access and water.

The Multipurpose building has been earmarked as the shelter in place option for the recreational uses subject to this planning proposal. It is constructed to BAL12.5 in accordance with AS3959 Construction of Buildings in Bushfire Prone Areas and has the capacity to accommodate 550 people with available water and amenities. As previously addressed within this response, all elevations achieve the necessary setbacks from bushland in accordance with the NSP guidelines except for the northern and western which has the ability to meet the 139m setback following vegetation management. Using the Bushfire

Attack Assessor and without any vegetation management the northern and western elevation of the building may expect to receive 1.66 kW/m² and 5.57 kW/m² of radiant heat respectively, as a conservative figure.

Access to the site complies with Table 5.3b and the available onsite water exceeds the requirements in accordance with Table 6.8c.

Extensive Agriculture

There are no requirements in PBP 2019 for Extensive Agriculture.

Function Centres, Entertainment Facilities and Food and Drink Premises

There are no requirements in PBP 2019 for Function Centres, Entertainment Facilities and Food and Drink Premises so an appropriate package of bushfire protection measures would be required. This would include a Bushfire Emergency Management and Evacuation Plan with an appropriate shelter in place refuge which has suitable APZs, adequate access and water supply.

This has been addressed both in the Strategic Bushfire Study and in this response letter within the points above.

- ***The updated Strategic Bushfire Study must consider all aspects of the planning proposal. At this time, the report only considers the proposal in relation to the valley area.***

Existing land uses on the upper ridges of Glenworth Valley, and subject to this planning proposal, would include Tourist and Visitor Accommodation.

Currently the ridge to the east of the valley floor contains 4 of the 5 relocatable cabins which have been constructed and approved under DA 43465/2013 and in accordance with *Planning for Bushfire Protection (2006)*. These buildings are constructed to BAL12.5 as per AS3959 and have Asset Protection Zones appropriate to surrounding vegetation and slope. The evacuation route to Peats Ridge Road from these cabins is much shorter and through managed paddocks as opposed to sections of forest, woodland or heath. Should shelter in place be the most appropriate action due to the rate of spread of fire on the eastern valley slopes then the construction level of the buildings and combined bushfire protection measures will provide an area of suitable refuge.

Finally, in addressing bushfire concerns Glenworth Valley Outdoor Adventures and the Lawler family have a long history of land occupation, in excess of 50 years, and recreational activities within the valley floor and its upper ridges. In the last 30 years they have seen bushfire activity in 1994, 2007 at Lower Mangrove and 2019/20 at Three Mile/Gospers and have been actively involved in numerous hazard reduction programs located on the property with the next planned hazard reduction programmed for Autumn 2022.

Despite fire history being recorded in and around the area, to date fire has not detrimentally impacted on the valley floor or its occupants including the oldest standing house on the Central Coast, which is located on the property adjacent to the Multipurpose building, built in 1832. This outcome may be due to the good planning of the recreational facility and its speedy and attentive response to advice from emergency service operators to close the site well ahead of the potential threat.

We look forward to your response on this matter. Should there be further issues with the information provided, an onsite meeting is requested to inspect and resolve these and provide for a better bushfire outcome within reasonable expectations.

Yours faithfully



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