

Introduction

I am writing to voice again my objections to the Wahroonga Estate Concept Plan MOD 8 as a local resident and a member of the Wahroonga Adventist community for over four decades.

Given that the original Concept Plan was approved in 2010, and the school, built in 2015 is now operating, the reality of the over-development that is planned for the remainder of the estate is extremely troubling. It appears that despite the removal of Block D, the community's long list of objections remain unaddressed. Church administrators are continuing to ignore the ongoing disquiet within the general community as well as church congregations. The comprehensive submission prepared by Amanda Von Kalm Barr, voiced very detailed legitimate objections. I completely endorse this submission. I will highlight what I consider significant issues: climate change, over-development, parking and I suggest a solution to many objections.

Climate Change

The months of unprecedented bushfires unlike anything we have ever witnessed in the past, resulted in more loss of life (25) and 1000% more houses destroyed than ever before, 222 homes in 2013; 206 homes in 1994. (2,448 homes lost in 2019/20).¹ This prompted over 972 submissions to the NSW Bushfire Emergency Inquiry, including concerning future difficulties with insurance risk.

Recognising that climate change is here and continues to drive an increase the fire risk, and thus community fear, the protection of human life should always be the overriding objective of planning controls. It is critical therefore, that building and planning regulations and standards, recently updated, are reviewed and applied to the planned over-development of the Wahroonga Estate. "Ticking off measures that protect property and structures does not necessarily result in adequately protecting human life. This has been recognised in updated strategic planning guidelines in every state. The updated NSW Planning for Bushfire Protection (PBP) Guideline (RFS 2020) notes that "strategic planning must ensure that future land uses are in appropriate locations to minimise the risk to life and property from bush fire attack. Services and infrastructure that facilitate effective suppression of bush fires also need to be provided for at the earliest stages of planning." This was submitted to the NSW Bushfire Inquiry by Planning Institute of Australia.

As we all witnessed the fury and power of firestorms (on TV), awareness that current guidelines provide for a 100m APZ buffer – clearly this is quite insufficient given that embers can travel for kilometres, and most bushfire losses occur within 350-500m of the fire edge.

"Bushfire mitigation and response is a difficult and complex issue requiring a whole-of-community effort to identify risk, undertake strategic risk assessments, to provide advice, education and information regarding the risk, and to undertake activities to mitigate those risks. All sectors of society from individuals, communities, businesses, industry, infrastructure managers and government need to be aware, engaged and prepared." This was submitted to the NSW Bushfire Inquiry by Australasian Fire and Emergency Service Authorities Council (AFAC) who are: The National Council for Fire and Emergency Services

As the surrounding community, school, hospital, nursing home and congregations live with the increased risk and changes that are occurring, the proponent needs to be communicating with the

¹ Mullens. G., Former Commissioner, Fire & Rescue NSW. Emergency Leaders for Climate Action (ELCA) April 2020

“whole-of-community” and demonstrating a modicum of respect. This would be greatly appreciated as there has been just one public meeting early in this decade long process, and a display evening of what is proposed, last year. This was not a consultation.

Over-development

Given that climate change is already here, it is when, (not if) there is a future bushfire, the following are estimates of the numbers of people who need to be considered in any evacuation plan:

- vulnerable patients both in the hospital and nursing home ?500
- a school that accommodates 800 students, along with 30 staff
- two functioning child-care centres with another being built, 150?
- three medical centres within the estate and another close by, 300
- Possibly 1200 people in the some 450 homes in the area around The Broadway, south of the Commenarra Parkway, and possibly
- another 1500-2000 people living within a one mile radius of the Estate
- clinical and general hospital staff and visitors possibly 750-1000
- church headquarters staff maybe 100
- Fox Valley Community Centre visitors for educational/recreational activities 30-50
- Two church congregations possibly 1500
- and if block A, B and C are built, 500 making a possible total of 5000 or more people

I bring to the attention of the IPC a significant recommendation from the NSW Bushfire Inquiry, released July 2020.

Recommendation 73 states “That, in order to ensure the safety and wellbeing of vulnerable people during an evacuation, Resilience NSW:

a) identify aged care facilities in fire and flood prone areas, and ensure that emergency plans are in place and comply with the Evacuation Decision Guidelines for Private Health and Residential Care Facilities

b) develop/refresh evacuation centre protocols to specifically address the needs of vulnerable people.”

Parking and Traffic

The issue of inadequate parking for all three congregations as well as the school need to be urgently addressed by the IPC, before any further development. The increased traffic cannot be allowed to spill onto the streets. The details re parking are adequately covered in Amanda Von Kalm Barr’s comprehensive submission.

A Solution

Many of the objections to this Concept Plan will be solved by removing Blocks A, B and C from behind the school from this part of the Concept Plan. It provides sufficient room for a sports oval for the school and increased shared needed parking. A sports oval with parking under it, is a possibility. This could also provide an essential evacuation area for the several thousand people who are at risk when bushfires come. As they will. It also allows room for a helicopter landing.

Thankyou for considering my objections to the Wahroonga Estate Concept Plan MP 007_0166 Modification 8.

Submitted by Elizabeth ANN Campbell