

## SUBMISSION OF OBJECTION

State Significant Development Application SSD91496958

159167 Darley Street West, Mona Vale

Residential Development with InFill Affordable Housing

### 1. Executive Summary

This submission objects to SSD91496958 on the grounds that the proposed development presents unacceptable bushfire risk, unsafe evacuation conditions, noncompliant emergency access, and inability to meet statutory bushfire protection requirements. The site is directly adjacent to Category 1 bushfireprone vegetation and relies on a single constrained access route, creating a lifesafety risk that cannot be mitigated. The proposal fails to comply with Planning for Bush Fire Protection 2019 (PBP 2019), NSW RFS Guidelines, SEPP Housing 2021, and the EP&A Act s4.15(1)(b). On firerisk grounds alone, the development should not proceed.

### 2. Site Context and Bushfire Exposure

The site adjoins Category 1 bushfireprone vegetation, the highestrisk classification under PBP 2019. The surrounding landscape includes dense bushland, steep slopes, and established embertransport corridors. Relevant clauses include PBP 2019 Sections 1.3.1, 1.3.2, and 2.2.3. The proposal introduces highdensity residential occupation into an area where PBP 2019 discourages intensification.

### 3. Emergency Vehicle Access NonCompliance and Operational Constraints

Darley Street West is a narrow, constrained corridor with limited passing opportunities and existing congestion. The proposal does not demonstrate compliance with emergency access requirements. Relevant clauses include PBP 2019 Sections 5.2.1 and 5.2.7, and NSW RFS Guidelines for

Emergency Vehicle Access. The road corridor does not meet minimum width requirements and relies on a single access point.

#### 4. Evacuation Limitations and LifeSafety Risk

The proposal significantly increases the number of residents who must evacuate via a single constrained route. Relevant clauses include PBP 2019 Sections 5.2.3 and 1.3.4, EP&A Act s4.15(1)(b), and SSD SEARs. Safe evacuation cannot be demonstrated under credible bushfire scenarios.

#### 5. Asset Protection Zones (APZs) Physical Impossibility of Compliance

The site cannot provide compliant APZs within its boundaries. Relevant clauses include PBP 2019 Sections 3.1, 3.2, and 3.3. Insufficient APZ width results in higher BAL ratings and increased ignition risk.

#### 6. Bushfire Attack Level (BAL) Extreme Exposure

Given the sites proximity to Category 1 vegetation and slope characteristics, the likely BAL rating is BAL40 or BALFZ. Relevant clauses include PBP 2019 Sections 4.1, 4.2, and 4.3. Affordable housing construction models are incompatible with BALFZ requirements.

#### 7. Ember Attack and Spot Fire Risk

Mona Vales ridgeline and valley winds create high embertransport corridors. Relevant clauses include PBP 2019 Sections 2.2.4 and 3.5. Spot fires could block evacuation routes before the main fire front arrives.

#### 8. Infrastructure Vulnerability



Bushfire events frequently cause power and water supply failures. Relevant clauses include PBP 2019 Sections 5.4 and 5.5. The proposal does not demonstrate infrastructure resilience.

#### 9. Increased Burden on Emergency Services

Relevant clauses include EP&A Act s4.15(1)(b) and FRNSW Operational Requirements. The proposal increases population density in an area with constrained emergency response capacity.

#### 10. Failure to Assess Cumulative Risk

PBP 2019 requires holistic assessment of combined hazards. Relevant clauses include PBP 2019 Sections 1.3.2 and 1.3.3, and SSD SEARs. The application fails to assess combined impacts including access, APZs, BAL, evacuation, infrastructure, and density.

#### 11. Conclusion

The proposal fails to satisfy the requirements of PBP 2019, NSW RFS Guidelines, SEPP Housing 2021, and the SSD assessment framework. The combination of extreme bushfire exposure, noncompliant access, inadequate APZs, unsafe evacuation conditions, and unacceptable residual risk renders the site unsuitable for the proposed development. On firerisk grounds alone, the development should not proceed.