

# STEP Inc

Community-based Environmental Conservation since 1978

The General Manager  
Ku-ring-gai Council  
Locked Bag 1056  
Pymble NSW 2073

30 March 2011

Dear Sir

**Re: S06423: Managing Bushfire Risk, Now and into the Future, Draft background Study**

Council is to be commended for producing this wide-ranging document (Study). However, in the face of inadequate funding, an apathetic public and a municipality already almost fully and inappropriately developed, it is easy to be pessimistic about the possibility of a good outcome.

### **Alternatives to hazard reduction burns**

The Study makes it clear that there is no prospect of there ever being enough hazard reduction burning done to substantially reduce fire risk to life and property. The restrictions here come from financial, ecological and feasibility restraints. Recommendations made in section 6.1 to adopt a 'more strategic approach' to control burning are, in our view, problematic.

Alternative ways of reducing risk such as making structures more fire resistant and the like are logical and needed. One obvious additional strategy is to use selective hand clearing in addition to all other measures. STEP developed this technique some 30 years ago and we are at a loss to know why it has not been recognised and recommended. It can be seen at [http://www.step.org.au/downloads/hand\\_clearing.pdf](http://www.step.org.au/downloads/hand_clearing.pdf). The instructions may need amendment to be brought up to date in various ways but the principal remains. Site assessment might lead to selection of vegetation with lower flammability, particularly near riparian areas.

We now have hundreds of volunteer bush regenerators in the municipality whose brief could be extended to include hazard reduction by selective hand clearing. In addition, interested householders could be trained to deal with their local situation. As most bushland posing a risk is under the care and control of Council or National Parks, all such areas would need to be included in the scope of the programme as happens for bush regeneration work.

Selective hand clearing is an ideal tool for managing areas that have been control burnt and which have prescribed periods between burns, typically 7 years. As well as removing regrowth as required, selective hand clearing to achieve APZ fuel requirements is the ideal method for removing the debris that follows cool hazard burns as the trunks of shrubs fall over one another and support suspended bark, twigs and the like and so constitute a pretty immediate new hazard. In addition, whereas fire burns indiscriminately, selective clearing can avoid any endangered species, target weeds and provide a superior ecological result where loss of biodiversity is minimised. Apart from being once mentioned in 5.4, the Study does not seem to envisage selective hand clearing.

Chipping in areas is mentioned, for instance in 6.6. If this is meant to be following indiscriminate clearing of vegetation it should be prohibited.

**We recommend** that selective hand clearing is introduced into the Draft Study and that it is given prominence as a hazard reduction tool. We note that the RFS publication *Standards for asset protection zones*, advocates selective hand clearing on page 6 whereas section 3.7 of the Study mentions only fire. **We further recommend** that follow-up after burns be done only by selective hand clearing techniques and that any chipping required be only of vegetation so cleared.

### **Minimising canopy risk**

As Council is bound by Section 63 of the *Rural Fires Act 1997* it has an obligation to do more than remove low fuel by burning or hand clearing. In APZ areas the publication *Standards for asset protection zones* states that tree crowns should be separated by two to five metres and that canopy should not overhang within 2 to 5 metres of a dwelling. Homeowners should be given the right to implement these rules on their own properties. In not carrying out and allowing this type of hazard reduction Council is exposing the community to unacceptable risk and itself to the possibility of litigation.

**We recommend** that, subject to always protecting endangered species and ecological communities, Council maintain all land under its care and control as if rules equivalent to those for an APZ applied.

### **The Tree Preservation Order**

The advent of global warming with attendant increasing frequency and ferocity of wildfire, together with the lessons from recent fires such as those in Victoria, mean that some of the existing shibboleths should be modified or abandoned. It is important that we foresee the possibility for catastrophe rather than waiting for catastrophe to occur and then reacting.

The tree preservation order (TPO) was implemented for good reasons and should of course remain. There are instances, however, where the desire to protect trees conflicts with the needs to protect life and property. The restriction that only trees within 3 metres of a house can be removed or pruned is inappropriate in many situations. Residents should not have to apply under the Rural Fires Act to remove trees that pose a fire danger. The exclusion of verandahs and the like from even this 3 metre exemption is inappropriate where such structures are exposed to fire risk. The 3 metre rule and other conditions surrounding the TPO are arbitrary and should be subject to review.

Thus, we see the TPO as a Council regulation that in some respects is designed to maximise fire risk. That it was introduced for good ecological reasons is not enough justification if the price to be paid in urbanised Sydney is loss of lives and property.

**We recommend** that the TPO be reviewed and amended to take into account the risks to life and property from wildfires and that, subject to endangered species and ecological communities being protected, the 3 metre rule be extended to 8 metres in fire zones. There may be no need to alter the TPO outside of bushfire prone areas.

### **Fire events and police**

The list of fire events in 3.5 omits those of 3 December 1987 and 2 December 1997 in the upper Lane Cove Valley. In both cases there was immense risk to property and some homes were saved only by very brave efforts of residents. A feature of both events, especially the second, was the very poor performance of the police. Obviously not trained for this sort of emergency, they panicked and were more hindrance than help and added to rather than reducing risk. In addition, in both cases the brigades did not arrive until after the event despite residents pleading with them. Part of this was due to the friction between the Metropolitan Brigade and the RFS which we understand has now been resolved. The 01/02 fires also greatly affected the upper Lane Cove Valley.

**We recommend** that Council make whatever representations are necessary to ensure that police likely to attend a bushfire are properly trained.

### **Fire trails**

Section 4.4 of other Study refers to annual work to maintain fire trails and 6.4 mentions extending the trail system. As a result of a recommendation of Council's Bushland Management Working Party over 20 years ago some trails subject to water erosion were paved with no-fines concrete. This reduced long-term costs and prevented the constant application of road base that polluted the bush as it washed out.

**We recommend** that any trails not so treated be so paved and that any extension of the established fire trail system be carried out only after absolute necessity is established.

### **Research**

The 'research' mentioned in section 6.6, 20 a. and b. is inappropriate. Selective hand clearing (of all vegetation requiring removal, not only weeds) is an obvious and well-established method to reduce fuel. If the fuel is gone then no further research is required. Identifying 'sections' of bush that can be cleared during 'an emergency bushfire event' would be a policy fraught with risk. Fires can erupt and travel very quickly and the time and equipment required may not be available. **We recommend** that these two research proposals be abandoned.

### **Community Fire Units**

In recent years the Fire Brigades have moved away from street training and demonstrations in favour of large training events at the St Ives Showground and elsewhere. In our view these events, where dressing up in fire fighting regalia and listening to men in uniforms making speeches seems to be *de-rigueur*, are ineffective and no substitute for residents being trained in their own streets with their own street equipment. **We recommend** that Council make recommendations to the brigades that the CFU training returns to the local CFU areas.

We are of course available to discuss any aspect of this submission with you.

Yours sincerely

**Barry Tomkinson**

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