

21 July 2014

Manager Community Planning Rural Fire Service Locked Bag 17 GRANVILLE, NSW 2142

Email: 10.50@rfs.nsw.gov.au

Dear Sir/Madam

## **Draft Vegetation Clearing Code of Practice**

STEP Inc is a community-based environmental group, with a membership of over 400 in the Hornsby/Ku-ring-gai area. Our group has considerable experience in bush regeneration and preserving natural bushland and native vegetation.

STEP supports the need for changes to the vegetation clearing code to provide greater safety for property and people living and working near bushfire prone land. However we have some concerns with the draft code of practice. This issue requires detailed consideration and consultation. A one-size fits all approach will lead to serious unintended consequences for bushland, particularly urban bushland and community amenity. We consider that the period available for consultation and the advertising of the draft amendments is inadequate. The deadline should be extended beyond 21 July 2014.

There are many areas of urban bushland and gardens that have high biodiversity and heritage value, that enhance the amenity and quality of life for residents through shading and reduction in sun reflection from paved areas, that is, they reduce the Heat Island Effect. Let's not throw out the baby with the bath water. The bushland may be in small pockets with no proximity to large tracts of bush where a fire can build up momentum. For example, current mapping of bushfire prone land in Ku-ring-gai includes areas near shopping centres and the Pacific Highway. There are also many bushland areas near the Harbour. The new code may make residents feel obliged to remove trees and vegetation in areas that, in practice, have a low risk of bushfire. Sydney's green image could be devastated. More detail and consultation is required of the principles to be adopted in the mapping of the areas to which the 10/50 code will be applied.

Over 30 years ago STEP developed a technique for reducing fire risk in urban bushland areas called selective hand clearing. This technique focuses on the removal of regrowth and debris after hazard reduction burns and minimizing weed invasion. Details are available here: <a href="http://www.step.org.au/downloads/hand\_clearing.pdf">http://www.step.org.au/downloads/hand\_clearing.pdf</a>. The research behind the technique highlights the importance of education and training of owners of land in bushfire prone areas. There is a need for extensive education of landowners on how to manage their

land to minimize bushfire risk and at the same time to maintain the biodiversity and quality of the vegetation on their land.

Yours faithfully,

Jeil Green Jill Green

President