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Our Ref: 6106/2010

Tuesday, 16 February 2010

**RE: Community Title Subdivision & Construction of 32 Dwellings for Lot 211
DP1044292 & Lot 1 DP262300 Pacific Highway, Moonee:**

Dear Sir,

I am writing to you in relation to the issues raised in your letter dated 19th January 2010 regarding the bushfire recommendations for the above mentioned development.

1) The bushfire assessment needs to be made in accordance with Appendix 3 of the Planning for Bushfire Protection guideline, as the development includes approval of dwellings. There seems to be no mention of this in the Bushfire Risk Management Report.

Comment: The Bushfire Risk Management Report prepared by (Bushfiresafe (Aust) March 2007) identified construction standards for the proposed dwelling in accordance with PBP Appendix 3 which can be found on page 12 of the above mentioned report. An extract of page 12 of the Bushfire Risk Management Report covering the construction standard is found below:

“The bushfire risk management assessment undertaken in relation to the proposed development concluded a Level 3 construction standard for 10 of the southern most townhouses, Level 2 for 13 of the central townhouses, and Level 1 for 12 of the most northerly townhouses; construction standards in relation to Australian Standard AS3959 was identified as being required for any dwellings erected within the designated building envelopes.

The bushfire attack category was derived from;

- An identified Wet Sclerophyll bushfire vegetation on the southern aspect as being the dominant bushfire vegetation in relation to the designated building envelopes for the townhouses.
- An identified terrain in relation to the assessed dominant bushfire vegetation was assessed as downslope of 5° to 10° for approximately 50 metres, followed by a small creek and then upslope of 5° to 10°.

The bush fire risk assessment was conducted through an onsite inspection using the methodology set out in Planning for Bushfire Protection 2006 (PBP).

As the separation distance meets and/or exceeds the minimum recommendations of PBP table A2.5, the data above was analysed with the information supplied in PBP Appendix 3 table A3.4 (Determination of Category of Bushfire Attack FDI 80); the outcome being an “Extreme” for the southern townhouses, “High” for the central townhouses and “Low” for the northern townhouses; bushfire attack categories for the proposed townhouse building envelopes.”

2) *A part of the proposed APZ falls in the 7(a) Environmental Protection Zone. The EA should justify whether having an APZ in this zone complies with the objects of this zone and whether it is a permissible use.*

Comment: As part of the development and the dedication of the 7(a) Environmental Protection Zone to Council the part of the APZ that falls within the 7(a) Zone is to be maintained by Council's village maintenance program, which is identified within the Bushfire Risk Management Report prepared by (Bushfiresafe (Aust) March 2007) Section 5.1 pages 9 & 10. An extract of pages 9 & 10 of the Bushfire Risk Management Report is found below:

"Based on the vegetation communities and slopes present on and adjacent to the subject property, and in accordance with the methodology detailed in Planning for Bushfire Protection (NSW RFS 2006) table A2.5 (Minimum Specifications for Asset Protection Zones (APZ) for Residential and Rural Residential Subdivision Purposes (for class 1 & 2 buildings) in FDI 80 Fire Areas), it is recommended that Asset Protection Zones (APZ) should be established around the proposed development as follows;

The bushfire risk assessment recommends the proposed development shall implement and maintain a 30 metre Asset Protection Zone on the southern aspect; all land not utilised for the construction of dwellings and associated infrastructure shall be maintained to the standard of an Inner Protection Area (IPA). The Asset Protection Zones are to be constructed and maintained to the standard of an Inner Protection Zone (IPA).

The Inner protection Area (IPA) must be established and maintained such that:

- There is minimal fuel at ground level that could be set alight by a bushfire (e.g. long grass, tree branches etc)
- Vegetation does not provide a path for the transfer of fire to the development
- Trees are a minimum of 5 metres away from any building, measured from the edge of the foliage to the roof line or any open balconies
- Bark chips and the like are not present within 2 metres of any building
- Trees present have a minimum canopy separation of 5 metres
- Trees present are not species that retain dead material or deposit excessive amounts of ground fuel in a short time

As part of the development, a large portion of the 7(a) Environmental Protection Catchment and Habitat shall be dedicated to council; the portion of the recommended APZ that occurs within the dedicated land shall be maintained by council's village maintenance program.

3) *There is no assessment of whether the proposed water tanks have enough capacity in the case of bushfire.*

Comment: The Bushfire Risk Management Report prepared by (Bushfiresafe (Aust) March 2007) identified the development will have availability to mains water supply including fire hydrants, therefore, the capacity of water tanks for bushfire protection is not considered. The supply of water tanks to the development is for stormwater control, which may be utilised for a secondary water supply for fire fighting purposes, however, these tanks were not considered as a bushfire protection strategy. An extract of page 11 section 5.4 of the Bushfire Risk Management Report is found below:

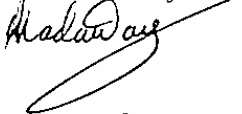
"Reticulated water is available to the development and will be supplied to each allotment through the town mains system in accordance with local water authority, council development control plans (DCPs) or any other policies and procedures.

- a) External fire hydrants will be installed and located in accordance with Australian Standard 2419-1, the hydrants shall be installed so as a clear unobstructed path to each designated building envelope, and

- b) The fire hydrants shall be installed at a maximum distance of 80m from the furthest extremity of the building/s, and
- c) The location of fire hydrants shall be delineated by blue pavement markers in the centre of the road, and
- d) All delivery water lines shall be installed underground to a minimum depth of three hundred millimetres (300mm), with all points above ground using metal pipes or raisers with a minimum internal diameter of nineteen millimetres (19mm)."

If you have any questions in relation to the above, or any other issue, please do not hesitate in contacting the undersigned.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Wayne Hadaway', with a long, sweeping underline.

Wayne Hadaway
Director
BushfireSafe (Aust) Pty Ltd