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Re: Tweed Valley Hospital – Multi-Level Car Park – Green Wall to External Facade
SUBJECT PREMISES - 771 Cudgen Road Cudgen NSW (Lot 11/-/DP1246853)

The purpose of this letter is to provide comment on a proposed green wall for the external façade of a proposed carpark at Tweed Valley Hospital.

The project is a multi deck car park (MDCP) to be located at 771 Cudgen Road Cudgen NSW to service the main hospital, Tweed Valley Hospital. The carpark is a proposed eight storey building with two mechanically ventilated basement levels and the remaining levels considered to be “open deck”.

The hospital development is regarded as a Special Fire Protection Purpose (SFPP) under s100B of the Rural Fires Act 1997 and an assessment of the development was prepared in accordance with Planning For Bushfire Protection 2006 Addendum 3 to PBP and PBP Pre-release 2018. The NSW Rural Fire Service (RFS) were consulted as part of this assessment process and issued a Bush Fire Safety Authority. The terms of the Authority which translated to Development Consent Conditions are abbreviated as follows;

- The proposed hospital building shall be built to sections 3 and 5 (BAL-12.5) of AS3959-2009 and section A3.7 Addendum Appendix 3 of Planning for Bush Fire Protection 2006
- Landscaping is to be in accordance with Appendix 4 of PBP 2019
- The proposed hospital building shall include a minimum Asset Protection Zone (APZ) complying with Condition B19 of SSD9575 as marked in the approved plans and generally, divided into a 47 m inner protection area (IPA) and 20 m outer protection area (OPA)
- Water, electricity and gas supply services are to comply with sections 4.1.3 and 4.2.7 of PBP 2006
- Access provisions are to comply with Table 6.4b of PBP Pre-release 2018
- A Bush Fire Emergency Management and Evacuation Plan be prepared for the proposal.

A Green Wall cannot comply with the above development consent conditions, as Landscaping is required to comply with Appendix 4 of PBP 2019 so as to reduce the risk of

- direct flame contact on the building
- damage to the building asset from intense radiant heat, and
- ember attack.

Some general concepts of implementing and maintaining landscaping in accordance with Appendix 4 of PBP include carefully selecting species and their location relative to their flammability as well as minimising continuity of vegetation both horizontally and vertically. Trees and vegetation generally should not touch or overhang the building. A green wall cannot be considered consistent with these concepts and should not be employed within the site.

Kind Regards



Catherine Gorrie

(a person who is recognised by the NSW Rural Fire Service as a suitably qualified consultant in bush fire risk assessment)

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