

7 June 2017

Angus Dawson
Project Director
Health Infrastructure
PO Box 1060
North Sydney NSW 2059

Dear Angus,

RE: Review of Bushfire Matters: ACCE - 22 Hospital Road, Bulli

Peterson Bushfire (consultant – David Peterson) was engaged to undertake a review of bushfire protection planning matters related to the proposed Bulli Hospital Aged Care Centre of Excellence (ACCE) to be located at 22 Hospital Road, Bulli.

1.0 Review considerations

The review included examination of documents provided by Health Infrastructure, desk-top analysis of the site and any surrounding bushfire hazard, as well as knowledge of the local area gained from

preparing bushfire assessments for neighbouring lands. A site inspection or inspection of the hazard was not undertaken specifically for this review. The following was reviewed:

1. Letter by Travers Bushfire and Ecology (TBE) to Johnstaff, dated 5th January 2016 and titled 'Bushfire Assessment for 22 Hospital Road, Bulli';
2. Bush Fire Safety Authority (BFSA) issued by NSW Rural Fire Service (RFS) for the proposal, dated 22 December 2016;
3. Aerial imagery from Nearmap, image capture dated 8 May 2017.

2.0 Review findings

This review has found the TBE bushfire assessment to be accurate in determining the level of hazard and the fact that the adjoining vegetation mapped on the Wollongong Bush Fire Prone Land Map should not be identified as 'bushfire prone vegetation' due to its very small size, condition and separation from the true bushfire hazards to the north and south-west. Previous bushfire assessment experience by the author in the same area supports this finding.

It is not uncommon to find inaccuracies with the bushfire prone land mapping process, and many maps are now outdated. Such inaccuracies are accepted as the maps are designed to be a planning trigger only, produced on a broad scale and not intended to be used as a specification tool. If a site is mapped as bushfire prone property (any part of a lot containing 'bushfire prone vegetation' or 'bushfire prone buffer') then further detailed assessment following the methodology specified by the RFS document 'Planning for Bushfire Protection 2006' (PBP) is required.

The TBE letter provides the required assessment and concludes that "*the site is not affected by bushfire prone land and therefore does not require compliance with Planning for Bushfire Protection 2006*". Therefore, bushfire protection requirements should not apply. However, the TBE letter follows this conclusive statement with a recommendation to manage the site as an asset protection zone following the RFS document 'Standards for Asset Protection Zones' and Appendix 5 of 'Planning for Bushfire Protection 2006'. This recommendation is considered unwarranted due to the findings relating to hazard level and bushfire prone land affectation.

It is noted that the RFS BFSA lists a condition requiring the management of the site as an Inner Protection Area (IPA) in accordance with 'Planning for Bushfire Protection 2006' and 'Standards for Asset Protection Zones'. As stated above, such a condition should not be required. The condition is a standard one that RFS places on all BFSA's regardless of the level of risk. The feature of such a

condition does not necessarily mean that RFS have identified trees or vegetation to be removed from site.

An assessment of compliance with IPA performance objectives may discover vegetation management works in addition to those related to the development proposal may not be required. Given the large separation from the bushfire hazard, the row of trees along the northern and southern boundaries may already comply with the performance objectives of an IPA. Often, the pruning or removal required for construction of buildings and associated infrastructure (e.g. footings, drainage, access, services etc) and the landscaping objectives (e.g. aesthetics, solar access, security, access, and maintenance and protection of buildings etc) achieve IPA performance objectives around the perimeter of buildings for a development such as an aged care facility or hospital.

6.0 Conclusion

In conclusion, it is my professional opinion the TBE letter addresses the matter of hazard, risk and bushfire prone land affectation accurately, however the recommendation for managing the site as an IPA is considered unnecessary. The fact that RFS also list this is a condition on the BFSAs does not necessarily mean trees and other vegetation require removal from site. It is a standard condition placed on all BFSAs. Careful assessment of the proposal against the current tree cover within the context of the large hazard separation may find compliance with IPA performance objectives can be achieved.

Please don't hesitate to call using the number below should you have any questions or seek clarification.

Yours sincerely,



David Peterson
Director

