

Bushfire Assessment

Proposed:
**RSL Seniors Housing
Redevelopment**

At:
**RSL ANZAC Village,
Narrabeen NSW**

Reference Number: 240063C

11 March 2026

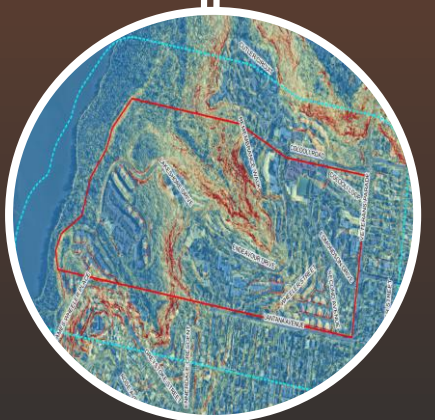
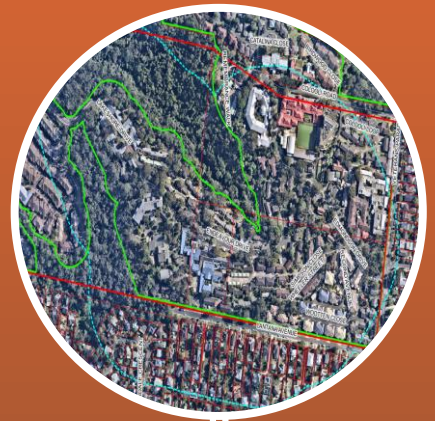


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Version Control				
Version	Date	Author	Reviewed by	Details
1	25/11/2025	Andrew Muirhead	Stuart McMonnies	Draft Report
2	05/11/2025	Andrew Muirhead	Stuart McMonnies	Draft Report
3	08/01/2026	Andrew Murihead	Stuart McMonnies	Final Report
4	16/01/2026	Stuart McMonnies		Plan Update
5	20/01/2026	Andrew Murihead		Plan Update
6	25/02/2026	Andrew Murihead		APZ description
7	11/03/2026	Andrew Murihead		Project Description

List of Abbreviations:

APZ	Asset Protection Zone
AS3959	Australian Standard 3959 'Construction of buildings in bushfire-prone areas' – 2018
BAL	Bushfire Attack Level
BPMs	Bushfire Protection Measures
BPLM	Bushfire Prone Land Map
Council	Northern Beaches Council
ELVIS	Elevation and Depth Foundation Spatial Data
EP&A Act	<i>Environmental Planning and Assessment Act - 1979</i>
FRNSW	Fire and Rescue NSW
IPA	Inner Protection Area
NASH	National Association of Steel-framed Housing
NCC	National Construction Code
NP	National Park
NSP	Neighbourhood Safer Place
OPA	Outer Protection Area
PBP	<i>Planning for Bush Fire Protection – 2019</i>
ROW	Right of Way
RF Act	<i>Rural Fires Act - 1997</i>
RFS	NSW Rural Fire Service
SEPP	State Environmental Planning Policy
SFPP	Special Fire Protection Purpose
SSD	State Significant Development
SWS	Static Water Supply

Executive Summary:

This Bush Fire Assessment Report has been prepared by Building Code and Bushfire Hazard Solution P/L on behalf of RSL Lifecare (**the Applicant**). It accompanies an Environmental Impact Statement (**EIS**) in support of State Significant Development Application for the redevelopment of their ANZAC Village, Narrabeen site (**the site**).

Development consent is sought for the following. A detailed description of the development is outlined in the Environmental Impact Statement prepared by Colliers Urban Planning.

Concept Proposal

A concept master plan for the renewal of parts of the existing RSL ANZAC Village for seniors housing, comprising:

- Residential accommodation for the purposes of seniors housing, including ancillary uses, supporting a new onsite Gross Floor Area of approximately 72,000sqm;
- A range of planning envelopes across the site accommodating basement levels and heights ranging between one (1) to eight (8) storeys;
- Approximately one thousand, six hundred (1600) new underground and structured car parking spaces, including street parking;
- Demolition and site preparation works, including tree removal;
- Site landscaping, tree planting and embellishment works;
- Upgraded entries to the site from Lantana Avenue and Veterans Parade and upgraded internal vehicle and pedestrian access and circulation; and
- Utility and services augmentation as required.

Stage 1 Development

Detailed approval for the operation and use of the first stage of the concept proposal, comprising:

- Demolition and site preparation works, including tree removal;
- Residential accommodation for the purposes of seniors housing, including ancillary uses, supporting a new onsite Gross Floor Area of approximately 12,700sqm;
- A range of building heights across the site accommodating one basement level, a row of garages, and three different building heights of two (2), five (5) and six (6) storeys;
- One hundred and twenty-two (122) basement car parking spaces, fourteen (14) garage parking spaces, as well as an estimated forty-one (41) surface parking spaces;
- Amendments to existing bushfire asset protect zones to facilitate the development;
- Associated landscape and open space delivery;
- Building identification signage and wayfinding; and
- Services and utility augmentation.

In this instance the site is depicted on Northern Beaches Council's Bushfire Prone Land Map (**BPLM**) as containing designated Category 1 and 2 Vegetation and Vegetation Buffer. The site is therefore considered 'bushfire prone'.

In relation to this application item 20 of the issued Secretary's Environmental Assessment Requirements (**SEARs**) requires a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with *Planning for Bush Fire Protection 2019* (**PBP**).

The vegetation identified as posing a bushfire hazard has been determined to be Forest.

The subject site contains an operational seniors housing and aged care development and subsequently is eligible for assessment under section 6.4 'Development of existing SFPP facilities' of PBP.

The development seeks to provide a better bushfire safety outcome than the existing approved development.

The Bushfire Protection Measure package includes:

- Improved Asset Protection Zones (increase APZs to buildings and additional vegetation management where possible);
- Reduction in occupant numbers in the non-compliant area (Removal of 81 RAC units and 5 ILUs within the BAL FZ and BAL 40 areas as shown in Figure 04);
- Redistribution of risk profile by relocating an Aged Care facility which is currently in the Flame Zone (218 RAC removed within Stages 1-5 and replaced with 399 ILUs, 7 townhouses, and 78 studios constructed to relevant BALs (maximum BAL 29) and 104 RACF constructed to relevant BALs (maximum radiant heat 10kW/m²);
- Implementation of a comprehensive Bushfire Emergency Management Plan (delivered prior to Occupation Certificate of each stage);
- Upgrade of the existing buildings for ember protection as per the ember upgrade staging strategy as shown in Figure 12.
- Nominate assembly building/s (existing or proposed) for all residents and staff that has complying APZs for new SFPP development and comply with BAL 12.5 under AS3959, (Montgomery Theatre to be used until new building is constructed within Stage 3);
- New buildings being sited in the most appropriate locations (the minimum acceptable setbacks will be to achieve 29kW/m²),
- All new construction is to comply with the relevant Bushfire Attack Level under Australian Standard 3959 'Construction of buildings in bushfire-prone areas' 2018,
- The internal road network be improved to better facilitate the movement of fire appliances and other emergency services. This includes the introduction of perimeter roads adjacent the identified bushfire hazards and ensuring carriageways and curve radius of access roads within the site can support fire-fighting appliances,
- Any new roads are to strictly comply with the access requirements set out in section 6.0 of this report,
- New hydrant system sizing, spacing and pressures are to comply with AS2419.1 – 2021

The overall Better Outcome has been reviewed by the NSW RFS and they have provided the following advice:

1. **Proposal Support:** The NSW RFS supports the proposal based on the Bush Fire Design Brief and associated plans and reports.
2. **PBP 2019 Principles:** Support is given for applying Section 6.4 of PBP 2019, as the redevelopment qualifies as a Special Fire Protection Purpose (SFPP) and is not a full rebuild.
3. **SFPP Compliance:** Infill development must comply with Chapter 6 of PBP 2019, ensuring APZs meet the 10kW/m² threshold via deemed-to-satisfy or performance-based solutions.
4. **Child Care Centre:** Not supported due to change of use and non-compliance with Section 6.8 and Table 6.8a of PBP 2019.
5. **Perimeter Road:** A new linked perimeter road to the southwest of Catalina Village, connecting to Lantana Avenue, must comply with Table 6.8b requirements.
6. **Resident Relocation:** Further relocation of RACF residents should be considered to avoid exposure to radiant heat above 10kW/m².

7. **Evacuation Planning:** A comprehensive emergency management and evacuation plan is required, assessing current road adequacy.
8. **Building Placement:** No new buildings or infrastructure should be closer to bush fire hazards, though this is not the sole criterion for SFPP infill development.

In relation to item 3 above further clarification was provided by the NSW RFS on 18 December 2025, as follows:

*Thank you for your enquiry and yes, Point 3 in the **Pre-DA Bush Fire Advice Summary, SFPP Compliance: Infill development must comply with Chapter 6 of PBP 2019, ensuring APZs meet the 10kW/m² threshold via deemed-to-satisfy or performance-based solutions, only relates to the proposed Child Care Centre and the RACF (relocated RACF, previously sited within the high-risk Catalina Complex location, to a new location, where they would not be exposed to radiant heat levels in excess of 10kW/sqm).***

The masterplan has been designed / modified since to meet these requirements.

As identified in the Pre-DA and the overall better outcome package all existing buildings within 100 metres of the vegetation will be upgraded to improve ember protection. The upgrade will be undertaken in stages commensurate with the works proposed within each stage of the development and the buildings adjacent to the hazard will be upgraded within the earlier stages (as shown in Figure 12).

All APZs within the areas in which are BAL 29 or higher (radiant heat level >19kW/m² area shown in Figure 13) will be maintained in accordance with Appendix 4 of *Planning for Bush Fire Protection 2019* and the NSW Rural Fire Service publication 'Standards for Asset Protection Zones'.

The balance of the renewal area will be maintained in accordance with the proposed Landscape Plan prepared by Arcadia. The proposed Landscaping will be managed and maintained to prevent the spread of fire to the buildings. The overall approximate opaque tree canopy within the development area is 20.45% as calculated by Arcadia. The majority of the proposed trees will be streetscape planting and will not provide canopy link directly to the existing and proposed buildings.

It is our opinion the proposal can satisfy all relevant specifications and requirements of *Planning for Bush Fire Protection 2019*, Chapter 3 Part 5 Division 4 Section 96 (1) of *State Environmental Planning Policy (Housing) 2021* and is supported from a bushfire planning perspective.

1.0 Introduction

This Bush Fire Assessment Report has been prepared by Building Code and Bushfire Hazard Solution P/L on behalf of RSL Lifecare (Applicant). It supports a Concept and Stage 1 State Significant Development Application (SSDA) for a new seniors housing development on land at the RSL ANZAC Village, Narrabeen.

Development consent is sought for the following. A detailed description of the development is outlined in the Environmental Impact Statement prepared by Colliers Urban Planning.

Concept Proposal

A concept master plan for the renewal of parts of the existing RSL ANZAC Village for seniors housing, comprising:

- Residential accommodation for the purposes of seniors housing, including ancillary uses, supporting a new onsite Gross Floor Area of approximately 72,000sqm;
- A range of planning envelopes across the site accommodating basement levels and heights ranging between one (1) to eight (8) storeys;
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Stage 1 Development

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- One hundred and twenty-two (122) basement car parking spaces, fourteen (14) garage parking spaces, as well as an estimated forty-one (41) surface parking spaces;
- Amendments to existing bushfire asset protect zones to facilitate the development;
- Associated landscape and open space delivery;
- Building identification signage and wayfinding; and
- Services and utility augmentation.

The site is located at 90 Veterans Parade, Narrabeen (known as the subject property from herein), which is situated within the Northern Beaches Local Government Area (**LGA**) and is commonly known as the RSL ANZAC Village.

In this instance the site is depicted on Northern Beaches Council's Bushfire Prone Land Map (BPLM) as containing designated Category 1 and 2 Vegetation and the Vegetation Buffer. The site is therefore considered 'bushfire prone'.

In relation to this application item 20 of the issued Secretary's Environmental Assessment Requirements (SEARs) requires a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection 2019 (PBP).

21 Bush Fire Risk

- Provide a Strategic Bush Fire Study in accordance with Planning for Bush Fire Protection 2019 (PBP 2019) that addresses:
 - strategic planning requirements
 - site suitability
 - special fire protection purpose development
- Provide a Bush Fire Assessment Report that address:
 - site location on bush fire prone land, vegetation types, slope, aspect, and mitigating features
 - environmental impacts of bush fire protection measures
 - compliance with AS 3959-2018 construction standards
 - requirements in Appendix 2 of PBP 2019 and Appendix 1 Site Assessment Methodology, including Table A1.12.1 for APZ distances.

As the development relates to the redevelopment of an existing Seniors Housing development a Strategic Bush Fire Study is not required in accordance with *Planning for Bush Fire Protection*.

Seniors Housing is a listed Special Fire Protection Purpose (SFPP) development under section 100b (6 (a)) of the *Rural Fires Act 1997*.

This report has been prepared to address the relevant specifications and requirements for SFPP development as detailed in PBP.

The proposal has therefore been assessed against the aim and objectives detailed in Chapter 1 'Introduction' and the specific objectives and bushfire protection measures detailed in Chapter 6 'Special Fire Protection Purpose Developments' of PBP and Chapter 3 Part 5 Division 4 Section 96 (1) of *State Environmental Planning Policy (Housing) 2021*.

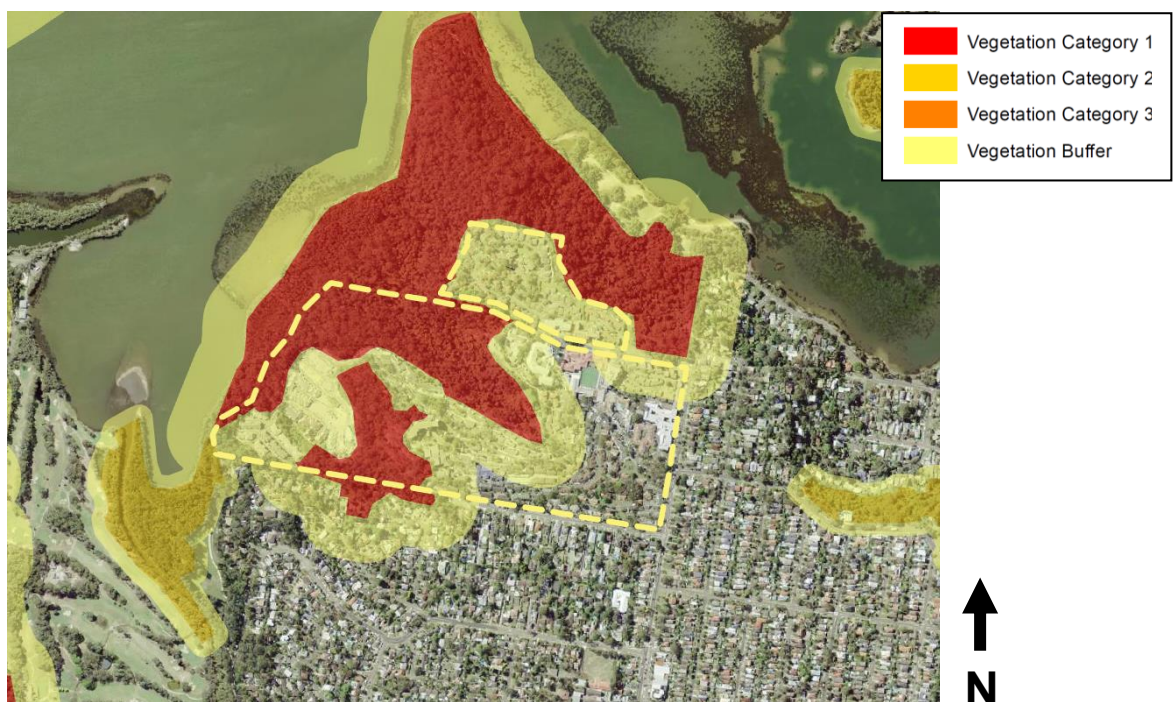


Figure 01: Excerpt from Council's Bushfire Prone Land Map (ePlanning Spatial Viewer)
Subject site (yellow outline)

2.0 Legislative Requirements

The site is subject to the following legislative provisions as it relates to bushfire planning and protection:

- *Environmental Planning & Assessment Act 1979*
- *Planning for Bush Fire Protection*

2.1 *Environmental Planning & Assessment Act 1979*

Section 10.3 requires councils, where a Bush Fire Risk Management Plan applies, to record a bush fire prone land map after consulting with the Commissioner of the NSW Rural Fire Service (NSW RFS). The Commissioner will designate lands to be bush fire prone within an area and, when satisfied that the lands have been recorded on a map, certify the map as the Bush Fire Prone Land map.

The subject site is designated as Bushfire Prone Land (Figure 01).

As the proposal is subject to Part 4.7 of the Act section 100B of the *Rural Fires Act 1997* does not apply in accordance with s4.41. This means that the proposed development does not require authorization in respect of bush fire safety.

In relation to this application one of the key issues identified in the Secretary's Environmental Assessment Requirements (SEARs) is an assessment of potential hazards and risks, which lists bushfire as a consideration. Therefore, this assessment details proposed bush fire protection measures and demonstrates compliance with *Planning for Bush Fire Protection 2019* (PBP).

2.2 *Planning for Bush Fire Protection*

As the subject site is identified as being bushfire prone and the proposed development involves construction of multistorey dwellings buildings the proposal is subject to the application of the relevant specifications and requirements of Planning for Bush Fire Protection.

The proposal is required to demonstrate that it achieves compliance with the following Chapters of PBP:

- Chapter 1 - Aim and Objectives
- Chapter 6 – Special Fire Protection Purpose Developments
- Chapter 8 – Other Development

3.0 Purpose of Report

The purpose of this Bushfire Assessment Report is to provide an independent bushfire assessment of the subject site and surrounding area and to determine if the State Significant Development will comply with the relevant specifications and requirements of Planning for Bush Fire Protection 2019.

This report specifically addresses item 20 of the issued Secretary's Environmental Assessment Requirements (SEARs).

4.0 Scope of this Report

The scope of this report is limited to providing a bushfire assessment and recommendations for the renewal area. Where reference has been made to the surrounding lands, this report does not purport to directly assess those lands; rather it may discuss bushfire impact and/or progression through those lands and possible bushfire impact to the subject property.

5.0 Aerial view & Masterplan

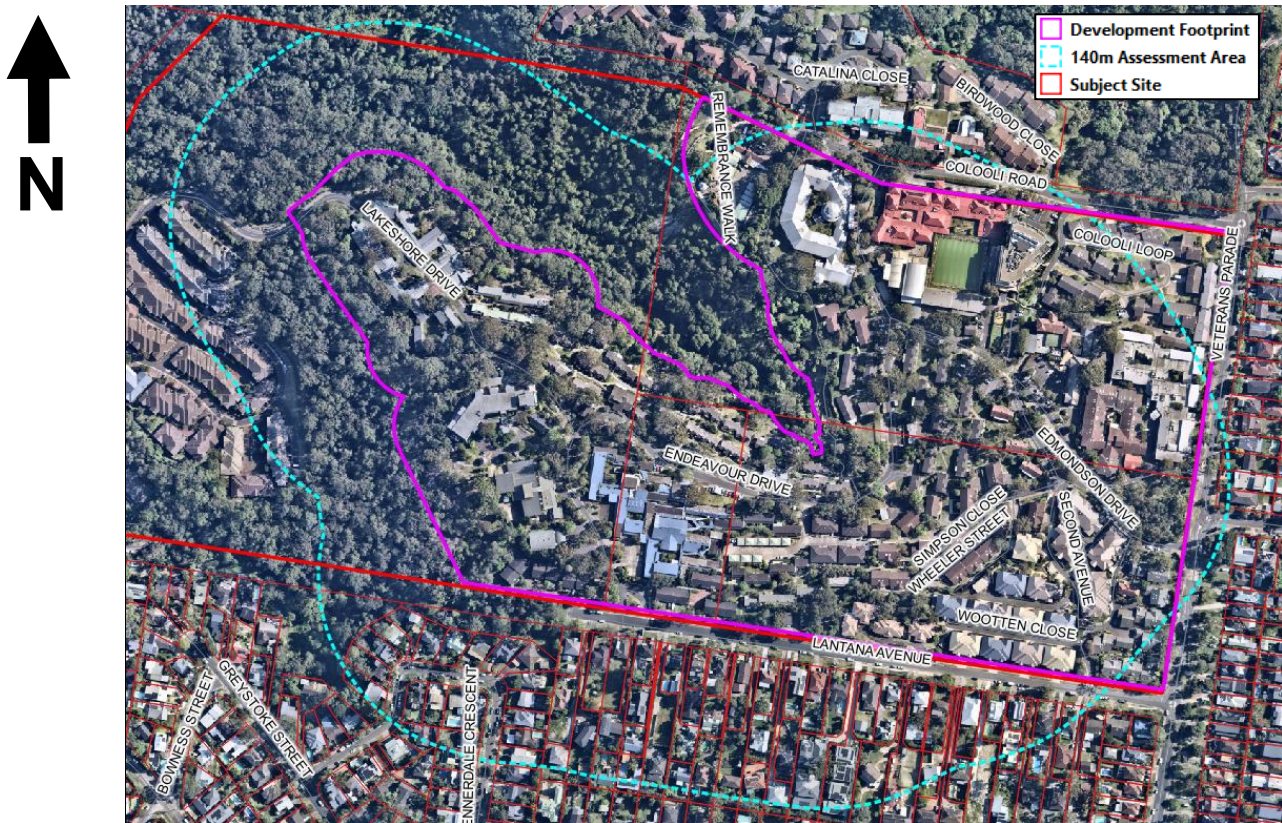


Figure 02: Aerial view of the subject site

Courtesy Nearmap – October 2025

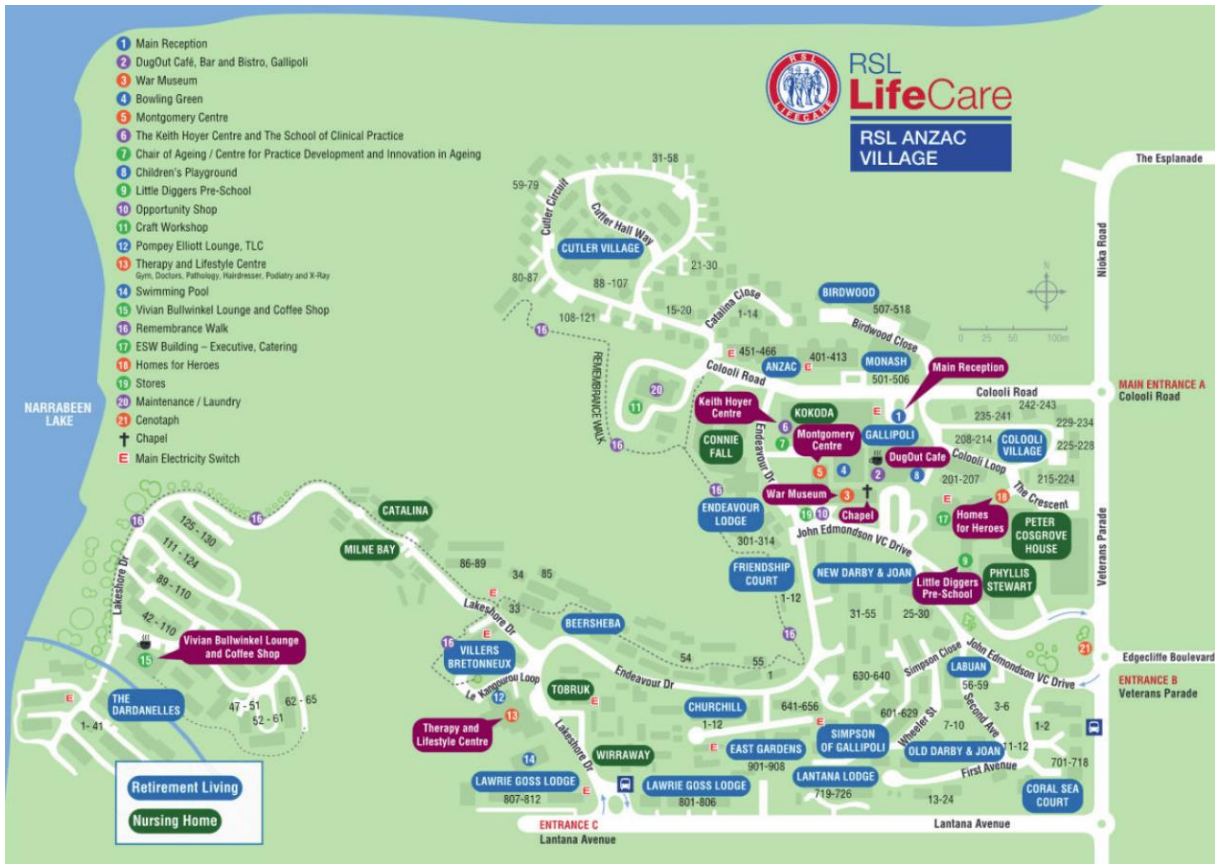


Figure 03: Extract from the current village map

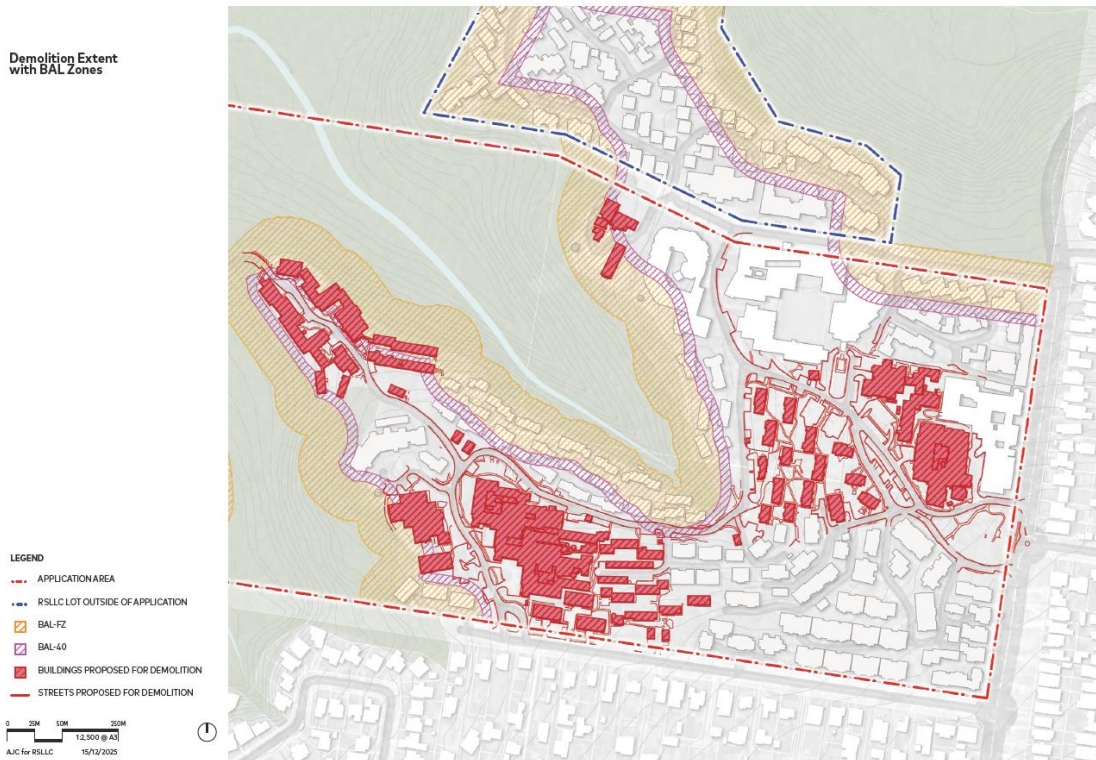


Figure 04: Proposed Demolition Plan



Figure 05: Proposed Masterplan



Figure 06: Proposed Masterplan



Figure 07: Proposed Stage 1 General Arrangement Plan Overlaid with BAL FZ (Red), BAL 40 (Purple) and BAL 29 (Green)

6.0 Site Assessment

Several detailed site inspections have been undertaken of the subject site by representatives of Building Code & Bushfire Hazard Solutions P/L. In addition to the collected site data this assessment has relied on:

- Aerial imagery of the subject area (NSW Spatial Services & Nearmap);
- 1 metre contour mapping of the subject area (Elevation and Depth Foundation Spatial Data – Geoscience Australia)
- NSW Planning Portal Spatial Viewer
- Vegetation Mapping (Vegetation NSW)
- Masterplan prepared by AJC.

6.01 Location

The site is located at 90 Veterans Parade, Narrabeen, which is situated within the Northern Beaches Local Government Area (**LGA**) and is commonly known as the RSL ANZAC Village.

The village overall has a total area of approximately 44 hectares and comprises 6 allotments. It is noted, however, that the SSDA is only proposed to apply to land with the four allotments of the village that are located south of Coolooli Road, as tabulated below.

Legal Description	Area (Approximately)
Lot 2611 DP752038	21ha
Lot 573 DP 752038	2ha
Lot 1 DP 803645	9ha
Lot 1 DP 774980	6ha

The site is irregular in shape and is bounded by Veterans Parade to the east and Lantana Avenue to the south. It currently comprises an existing low and mid-rise seniors housing development that contains a mixture of independent living units, veteran accommodation, residential care facility accommodation, and associated ancillary uses

The village comprises of sixteen (16) areas being;

ANZAC	Endeavour
Birdwood, Monash	Friendship Court
Colooli	Gallipoli
Churchill	Lantana Lodge
Coral Sea Court	Labuan
Cutler	Lawrie Goss
The Dardanelles	Simpson of Gallipoli
East Gardens	Villers-Bretonneaux

The options for future redevelopment focus on six (6) areas (refer to Figure 03).

The site is within the Greater Sydney Region Fire Weather District and is captured by the Northern Beaches Bush Fire Risk Management Plan.

6.02 Vegetation

The vegetation structure, connectivity and attributes are fundamental contributors to bushfire behaviour and its movement through the landscape.

As part of this assessment, we have considered the potential bushfire runs that currently exist into the site, as well as the potential fire behaviour and impacts from the retained vegetation within the site.

The vegetation within the subject site was found to comprise of two distinct groups, being either highly modified (managed landscapes and gardens) or bushland (natural and small areas of exotic incursion).

The vegetation in the broader landscape was found to be fragmented, being concentrated along watercourses and surrounded by existing established residential and commercial / industrial developments and waterbodies.

The comprehensive road network and surrounding developments also provide excellent exposure for the early detection of any unplanned fires in the broader landscape, facilitating an early response and ultimately suppression / containment by attending fire services.

The vegetation was found to consist of 20-30 metre tall trees with an understory of emerging trees, shrubs and grasses.

The vegetation posing a hazard to the northeast was found to be mapped as Blue Gum High Forest (PCT: 3126), Sydney Coastal Lilly Pilly-Palm Gallery Rainforest (PCT: 3039), Hunter Coast Lowland Spotted Gum Moist Forest (PCT 3234) and Estuarine Swamp Oak Twig-rush Forest (PCT: 4028) (Vegetation NSW), which have a vegetation formation of Wet Sclerophyll Forests, Rainforest, Wet Sclerophyll Forests and Forested Wetlands respectively.

Therefore, for the purpose of the Planning for Bush Fire Protection the vegetation posing a hazard to the proposed works has been determined to be Forest.

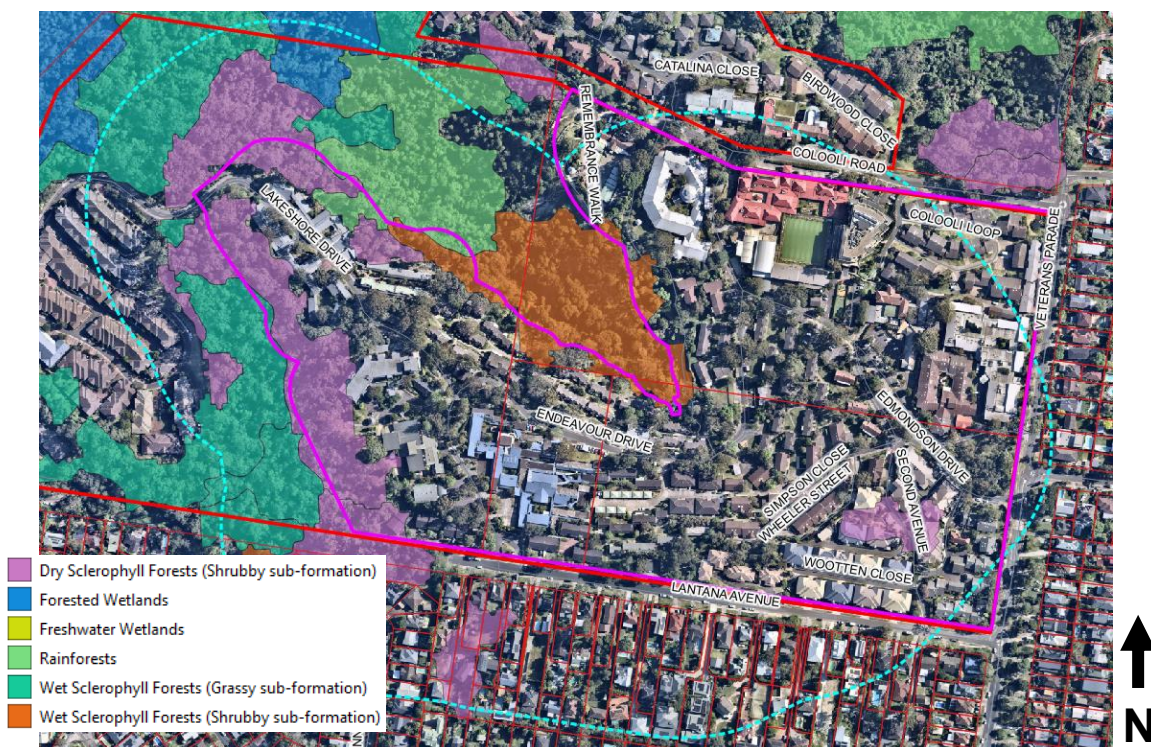


Figure 08: Aerial view of the subject area overlaid with vegetation mapping (Vegetation NSW)

6.03 Slope and Topography

The slope of the land under the classified vegetation has a direct influence on the forward rate of spread, fire intensity and radiant heat exposure. The effective slope is considered to be the slope under the classified vegetation which will most significantly influence bushfire behaviour toward the development site.

In accordance with A1.4 'Determine slope' of PBP the slope assessment is to be derived from the most detailed contour data available.

The slope that would **most significantly** influence bushfire behaviour for Stage 1 was determined from topographic imagery (1 metre contours sourced from ELVIS - Geoscience Australia) in conjunction with site observations to be:

- 15 - 20 degrees down slope within the hazard to the northeast
- 10 - 15 degrees down slope within the hazard to the west

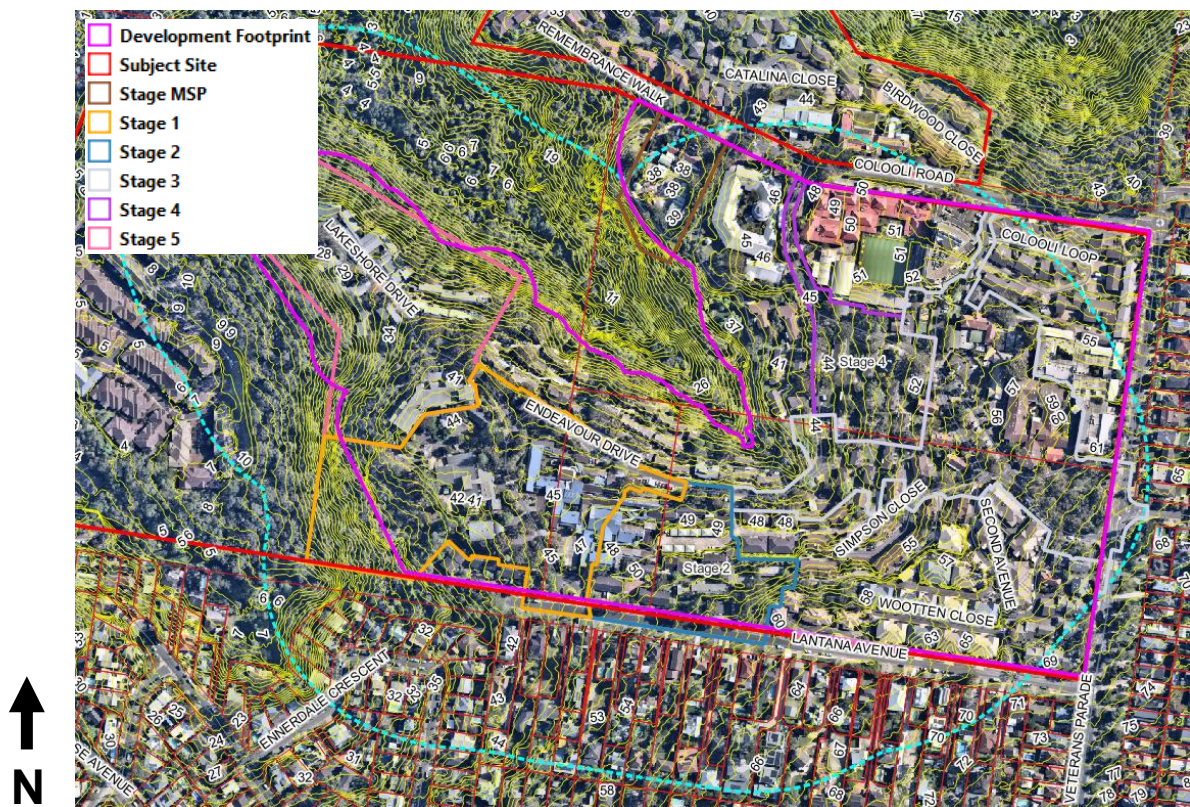


Figure 09: Extract from ELVIS – Geoscience Australia (1 metre contours)

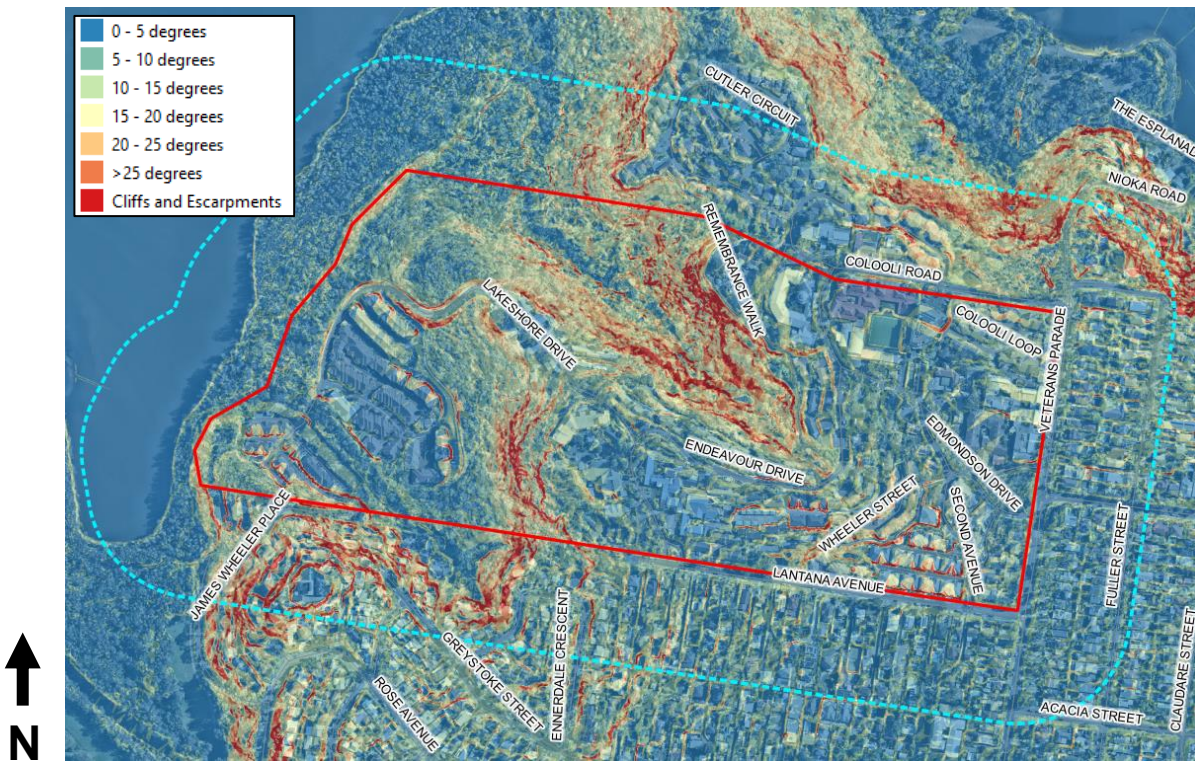


Figure 10: Extract from ELVIS – Geoscience Australia

6.04 Fire Weather

All development which attracts an Asset Protection Zone under PBP requires the identification of the relevant Fire Danger Index (FDI). The FDI required to be used for development assessment purposes is based on the local government boundaries, being Northern Beaches Council in this instance.

In accordance with the NSW Rural Fire Service publication ‘NSW Local Government Areas FDI’ (2017) Northern Beaches Council form part of the Greater Sydney Region Fire Weather District and attracts an FFDI of 100.

6.05 Fire History

There are areas within NSW which have significant fire history and are recognised as known fire paths. While the fire history is more commonly considered as part of strategic planning (to ensure future development is not exposed to an unacceptable risk), it is useful to consider at a Development Application phase to ensure the land is suitable for development in the context of bushfire risk.

There have been two recorded fires within the site in which occurred in 1993-94 and 2006-07 fire seasons (NPWS wildfire mapping 2022).

7.0 Bushfire Assessment

7.01 Planning for Bush Fire Protection - 2019

Properties considered to be affected by possible bushfire impact are determined from the local Bushfire Prone Land Map as prepared by Council and or the Rural Fire Service.

In this instance the subject site is depicted on Northern Beaches Council's Bushfire Prone Land Map (BPLM) as containing designated Category 1 and 2 Vegetation and Vegetation Buffer. The subject site is therefore considered 'bushfire prone'.

In relation to this application item 20 of the issued Secretary's Environmental Assessment Requirements (SEARs) requires a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection 2019 (PBP).

Seniors Housing is a listed Special Fire Protection Purpose (SFPP) development under section 100b of the *Rural Fires Act 1997*.

The proposal has therefore been assessed against the aim and objectives detailed in Chapter 1 'Introduction' and the specific objectives and bushfire protection measures detailed in Chapter 6 'Special Fire Protection Purpose Developments' of PBP.

National Construction Code 2022 (NCC) identifies additional bush fire provisions for certain Class 9 buildings accommodating vulnerable occupants on bush fire prone land which has also been considered. This assessment has also considered the addendum to PBP which coincides with adoption of the NCC.

7.02 Specific Objectives

The following table outlines the objectives that apply to existing SFPP development under section 6.4 'Development of existing SFPP facilities' of PBP and our comments on the proposal's compliance or otherwise.

Objective	Comment
<i>provide an appropriate defensible space;</i>	The proposed works will provide a larger defensible space.
<i>site the building in a location which ensures appropriate separation from the hazard to minimise potential for material ignition;</i>	The proposal will provide a larger defensible space and a better outcome for the entire site. The proposed works will be constructed to the relevant BAL.
<i>provide a better bush fire protection outcome for existing buildings;</i>	The overall masterplan will provide a better outcome for the site and occupants.
<i>new buildings should be located as far from the hazard as possible and should not be extended towards or situated closer to the hazard than the existing buildings (unless they can comply with section 6.8);</i>	The proposed works are within the existing pattern of development and the relocation of buildings away from the hazards and reduction in overall numbers in the BAL 40 and Flame Zone areas will provide a better outcome from the site.
<i>ensure there is no increase in bush fire management and maintenance responsibility on adjoining land owners without their written confirmation;</i>	There is no increase in bush fire management and maintenance responsibilities on adjoining land owners as a result of the proposal.
<i>ensure building design and construction enhances the chances of occupant and building survival; and</i>	The proposed works will provide a better outcome for the site and enhance the chances of occupant and building survival.
<i>provide for safe emergency evacuation procedures including capacity of existing infrastructure (such as roads).</i>	It has been recommended that the Bushfire Emergency and Evacuation Management Plan be updated as part of this application. The subject site has street frontage to multiple public roads which have capacity to accommodate a timely evacuation of the site.

7.03 Bushfire Protection Measures

Section 6.8 'Bush fire protection measures' of PBP outlines the specific Bushfire Protection Measures (BPMs) applicable to Special Fire Protection Purpose development, including APZs, Landscaping, Construction, Access, Services & Emergency Management Plan.

The following section addresses each BMP and the proposals compliance or otherwise.

Asset Protection Zones

Asset Protection Zones for new Special Fire Protection Purpose (SFPP) development are determined from Table A1.12.1 of PBP or bushfire design modelling achieving a radiant heat impact of no more than 10kW/m² at the closest point of the available building footprint.

The subject site contains an operational seniors housing and aged care development and subsequently is eligible for assessment under section 6.4 'Development of existing SFPP facilities' of PBP.

The development seeks to provide a better bushfire safety outcome than the existing approved development.

The Bushfire Protection Measure package includes:

- Improved Asset Protection Zones (increase APZs to buildings and additional vegetation management where possible);
- Reduction in occupant numbers in the non-compliant area (Removal of 81 RAC units and 5 ILUs within the BAL FZ and BAL 40 areas as shown in Figure 04);
- Redistribution of risk profile by relocating an Aged Care facility which is currently in the Flame Zone (218 RAC removed within Stages 1-5 and replaced with 399 ILUs, 7 townhouses, and 78 studios constructed to relevant BALs (maximum BAL 29) and 104 RACF constructed to relevant BALs (maximum radiant heat 10kW/m²));
- Implementation of a comprehensive Bushfire Emergency Management Plan (delivered prior to Occupation Certificate of each stage);
- Upgrade of the existing buildings for ember protection as per the ember upgrade staging strategy as shown in Figure 12.
- Nominate assembly building/s (existing or proposed) for all residents and staff that has complying APZs for new SFPP development and comply with BAL 12.5 under AS3959, (Montgomery Theatre to be used until new building is constructed within Stage 3);
- New buildings being sited in the most appropriate locations (the minimum acceptable setbacks will be to achieve 29kW/m²),
- All new construction is to comply with the relevant Bushfire Attack Level under Australian Standard 3959 'Construction of buildings in bushfire-prone areas' 2018,
- The internal road network be improved to better facilitate the movement of fire appliances and other emergency services. This includes the introduction of perimeter roads adjacent the identified bushfire hazards and ensuring carriageways and curve radius of access roads within the site can support fire-fighting appliances,
- Any new roads are to strictly comply with the access requirements set out in section 6.0 of this report,
- New hydrant system sizing, spacing and pressures are to comply with AS2419.1 – 2021

The overall Better Outcome has been reviewed by the RFS in which they have provided the following advice:

9. **Proposal Support:** The NSW RFS supports the proposal based on the Bush Fire Design Brief and associated plans and reports.
10. **PBP 2019 Principles:** Support is given for applying Section 6.4 of PBP 2019, as the redevelopment qualifies as a Special Fire Protection Purpose (SFPP) and is not a full rebuild.
11. **SFPP Compliance:** Infill development must comply with Chapter 6 of PBP 2019, ensuring APZs meet the $10\text{kW}/\text{m}^2$ threshold via deemed-to-satisfy or performance-based solutions.
12. **Child Care Centre:** Not supported due to change of use and non-compliance with Section 6.8 and Table 6.8a of PBP 2019.
13. **Perimeter Road:** A new linked perimeter road to the southwest of Catalina Village, connecting to Lantana Avenue, must comply with Table 6.8b requirements.
14. **Resident Relocation:** Further relocation of RACF residents should be considered to avoid exposure to radiant heat above $10\text{kW}/\text{m}^2$.
15. **Evacuation Planning:** A comprehensive emergency management and evacuation plan is required, assessing current road adequacy.
16. **Building Placement:** No new buildings or infrastructure should be closer to bush fire hazards, though this is not the sole criterion for SFPP infill development.

The masterplan has been designed / modified to meet these requirements.

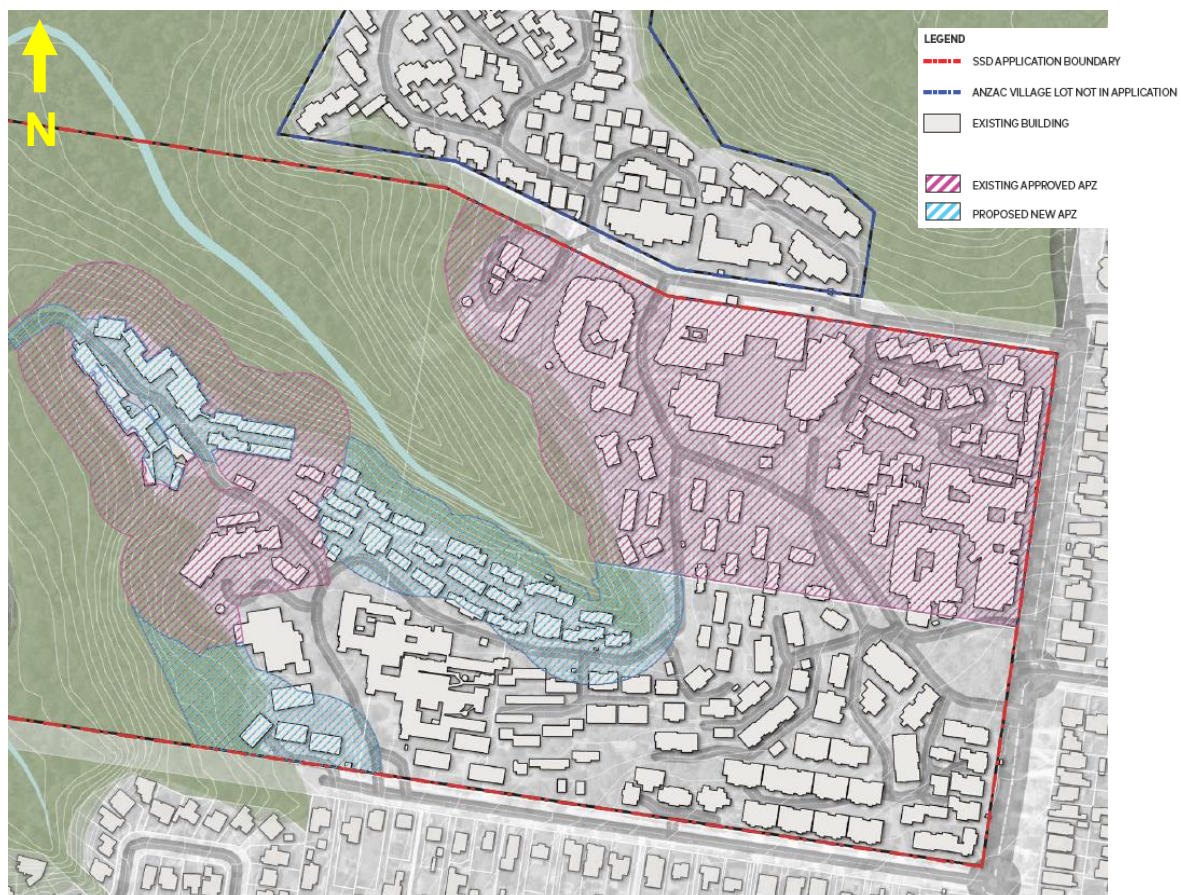


Figure 11: Aerial view of the subject area overlaid with approved and Proposed APZ.

As identified in the Pre-DA and the overall better outcome package all existing buildings within 100 metres of the vegetation will be upgraded to improve ember protection. The upgrade will be undertaken in stages commensurate with the works proposed within each stage of the development and the buildings adjacent to the hazard will be upgraded within the earlier stages (as shown in Figure 12).

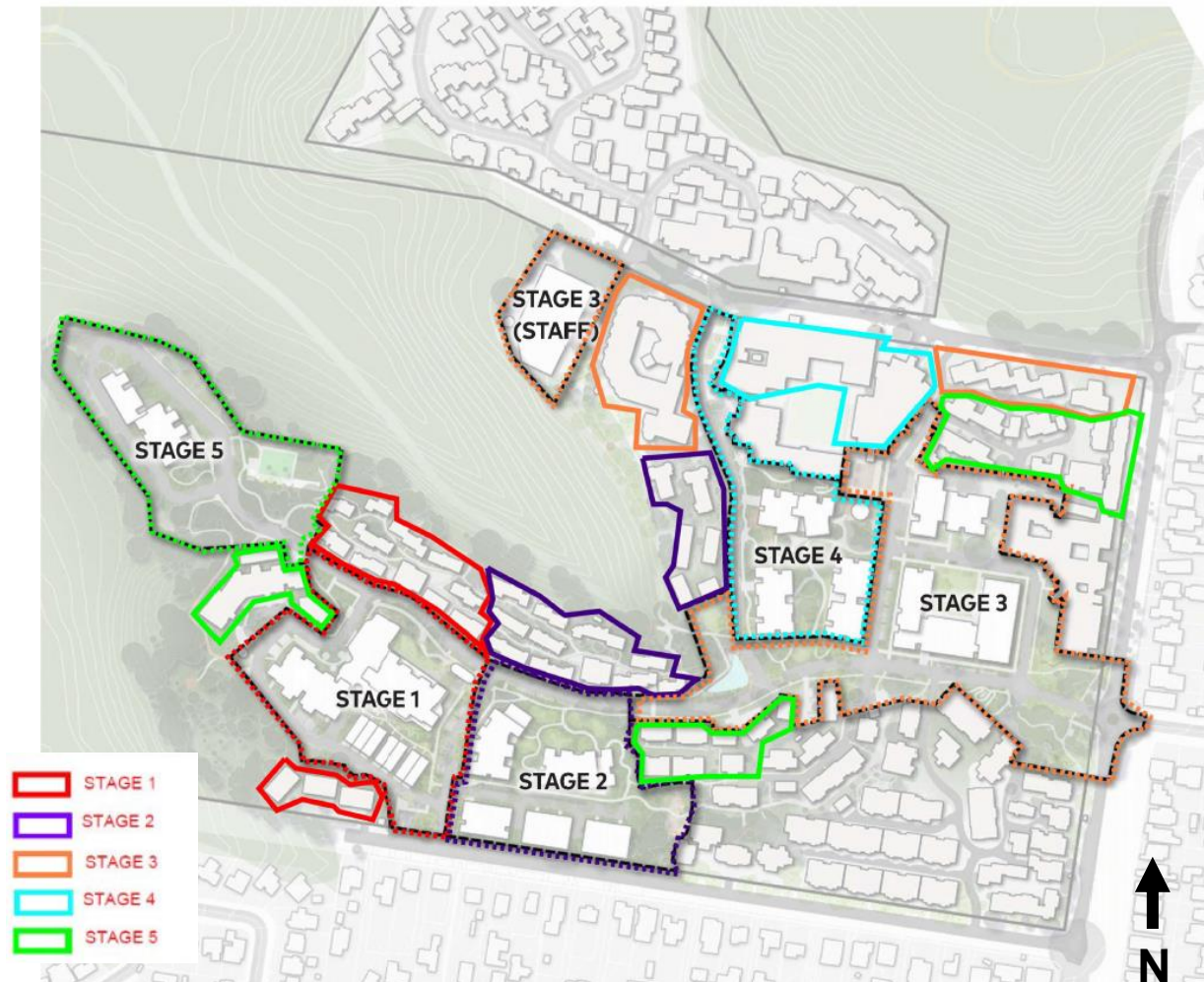


Figure 12: Aerial view of the subject area overlaid with the proposed staged ember upgrade.

All APZs within the areas which are BAL 29 or higher (radiant heat level $>19\text{kW/m}^2$ area shown in Figure 13) will be maintained in accordance with Appendix 4 of *Planning for Bush Fire Protection 2019* and the NSW Rural Fire Service publication ‘Standards for Asset Protection Zones’.

BCBHS confirms that the proposed APZ extension areas (as illustrated in Figure 11) as inspected in February 2026 require no clearance of shrubs and groundcovers, and with the removal of trees as nominated by Arborist in their Tree Survey (Attachment 2), will meet the requirements of *Planning for Bush Fire Protection 2019*.

The balance of the renewal area will be maintained in accordance with the proposed Landscape Plan prepared by Arcadia. The proposed Landscaping will be managed and maintained to prevent the spread of fire to the buildings. The overall approximate opaque tree canopy within the development area is 20.45% as calculated by Arcadia. The majority of the proposed trees will be streetscape planting and will not provide canopy link directly to the existing and proposed buildings.

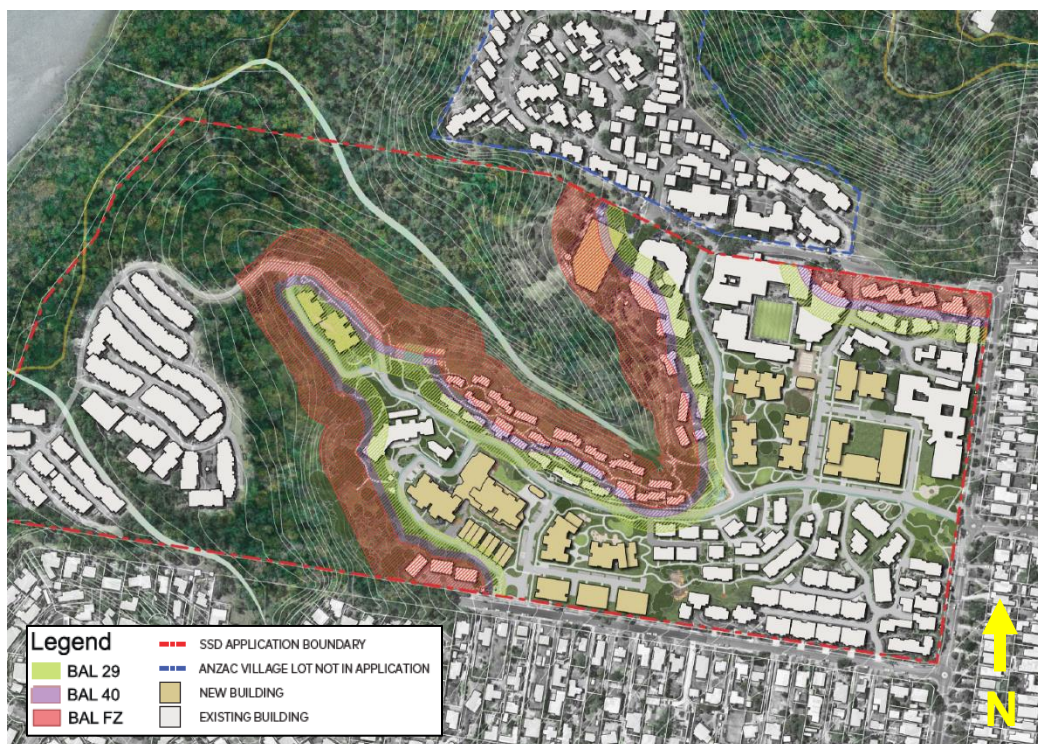


Figure 13: Area >19kW/m² which will be managed as an Asset Protection Zone



Figure 14: Landscape Masterplan

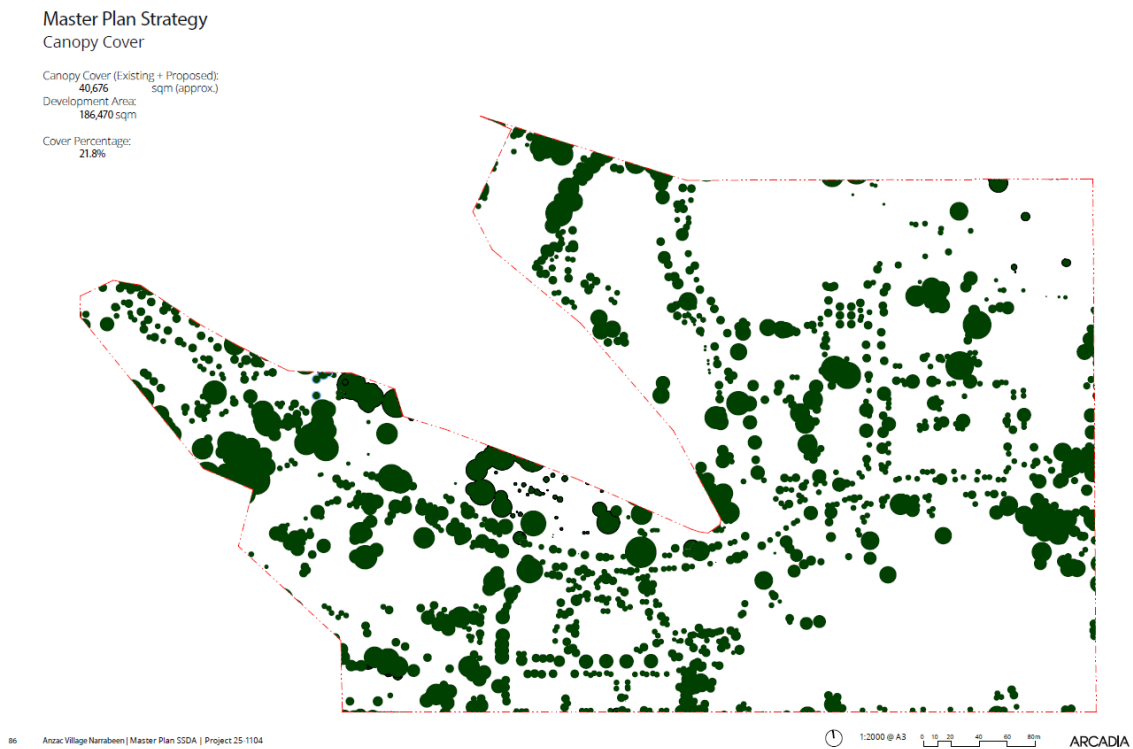


Figure 15: Overall Tree Canopy Cover

Construction

Due to existing site constraints, the minimum required APZs for new SFPP development cannot be achieved and therefore this proposal relies on the 'Better Outcome' approach consistent with s6.4 of PBP.

New construction will comply with the corresponding Bushfire Attack Level (as shown on the attached BAL Overlay).

Class 10 structures which are located >6 metres from any building are exempt from the application of AS3959.

The better outcome package will include ember upgrade to existing retained buildings within 100 metres of the bushfire prone vegetation. The upgrade will be undertaken in stages commensurate with the works proposed within each stage of the development and the buildings adjacent to the hazard will be upgraded within the earlier stages (as shown in Figure 12). This would involve screening operable windows, vents and weepholes within aluminium, steel or bronze metal mesh, installing draught excluders on side-hung doors, enclosing underfloor areas and sealing or screening any other gaps >3mm.

Section 8.2.2 of PBP addresses multi-storey residential development which are buildings exceeding 3 stories in height.

The following table lists the specific considerations for multi-storey residential development in accordance with Table 8.2.2 of PBP and our comments of the proposal compliance or otherwise.

Technical Consideration	Comment
<p>What capacity does the existing infrastructure have to allow evacuation of existing and proposed residents in the event of a bush fire?</p>	<p>In this instance where a large-scale evacuation was to occur this would be well in advance of a bushfire along Narrabeen Lagoon.</p> <p>TTW Traffic Engineers in their report Transport Impact Assessment SSD 85869467 has stated:</p> <p><i>The concept has been coordinated with the bushfire strategy to maintain redundant access/egress, complaint widths and turning areas for fire appliances, and to support controlled resident evacuation if required.</i></p> <ul style="list-style-type: none"> • <i>Upgraded internal links provide two-way operation with improved widths, sight lines and turning radii, enabling fire/ambulance vehicle access.</i> • <i>Swept-path testing confirms fire appliances can enter, pass, and turn within key nodes while outbound light-vehicle flows and maintained under controlled one-way/stop-go operation.</i> • <i>The site access points (including the upgraded site access) operate with reserve capacity.</i> • <i>Multiple outbound options (via Lantana Avenue, Veterans Parade and Colooli Road) reduce reliance on any single link and allow staging/sector evacuations if directed.</i> <p><i>With the proposed internal road upgrades and Veterans Parade intersection improvements, the local network is expected to have sufficient capacity to support a controlled evacuation and maintain unobstructed emergency/fire service access.</i></p> <p>The proposed internal roads will comply with the Access requirements detailed in Chapter 6 of Planning for Bush Fire Protection.</p>
<p>Can the building be located away from ridge tops to areas that have a reduced bush fire exposure?</p>	<p>The proposed building sites are located within the existing pattern of development, and the proposed buildings will be setback further from the vegetation.</p>
<p>If unavoidable, what is the impact on the risk to the building?</p>	<p>Not Applicable</p>
<p>Is this risk appropriate for the building and occupant numbers?</p>	<p>In consideration of the previous bushfire history (source NPWS Fire History dataset) and available Asset Protection Zones the bushfire risk is considered appropriate for the buildings.</p>

Technical Consideration	Comment
<p>What are the flame dimensions, including the flame angle?</p>	<p>Stage 1: Northeast Flame length: 72.53 metres Flame angle: 61 degrees</p> <p>West Flame length: 44.96 metres Flame angle: 70 degrees.</p>
<p>Where is the hottest part of the flame located? How would this impact on the proposed building?</p>	<p>Stage 1: Northeast Peak elevation of receiver: 17.26 metres</p> <p>West Peak elevation of receiver: 10.19 metres</p> <p>The entire building façade will be constructed to the relevant BAL and withstand the applicable radiant heat.</p>
<p>How would the warning and suppression systems in the building cope with this?</p>	<p>The proposed buildings within stage 1 and future stages will be constructed to the relevant Bushfire Attack Level (BAL 29) and have emergency warning systems.</p> <p>Building materials must account for the maximum projected radiant heat flux (BAL) and other forms of bushfire attack.</p>
<p>What wall and cladding materials are proposed and what is proposed for the openings/penetrations (i.e. windows and doors)?</p>	<p>The proposed buildings as part of stage 1 have the ability to comply with the relevant BAL as per the recommendations within this report.</p> <p>Future buildings developed under the Concept Master Plan shall comply with the relevant BAL as per the attached BAL Overlay.</p>
<p>How does the proposed building construction deal with fire spread from the vegetation to the inside of the building?</p>	<p>The proposed buildings will be constructed to withstand the relevant BAL and withstand the relevant radiant heat to protect the building from fire spread from the vegetation.</p>
<p>Is compliance with AS 3959 sufficient to ensure that the bush fire risk is mitigated?</p>	<p>Compliance with BAL 29 in accordance with AS3959 will be sufficient along with the APZs to mitigate the bush fire risk.</p>
<p>Is this appropriate for the design fire scenario?</p>	<p>Yes, the buildings will meet the appropriate Bushfire Attack Level.</p>
<p>Are there balconies proposed?</p>	<p>Yes</p>
<p>What may be stored on the balconies?</p>	<p>There will be no fixed items on the balconies.</p>

Technical Consideration	Comment
Can there be restrictions on what is stored on the balconies due to fire risk?	In consideration of the bushfire risk a restriction on what can be stored on balconies is not deemed necessary.
Is the warning and suppression system designed to take account of bush fire impact?	The warning and suppression systems used for BCA compliance will take into account bushfire impact.
Where are exits located? Are they guiding occupants away from the car park?	Exits are available at ground level, away from the basement carpark.
What would this mean for fire suppression?	<p>Access to the hazards for fire suppression will be via the access road network.</p> <p>Access to the subject buildings will also be available via the proposed internal roads.</p>
How would warning and suppression systems take account of this?	The warning and suppression systems will not impact the external fire fighting operations.
What would this mean for evacuation?	Occupants will be able to evacuate the site via the proposed internal roads and existing public road network.

It is of our opinion that the proposed and future buildings have the capacity to comply with section 8.2.2 of PBP.

Through the proposal of multi-storey buildings occupants in more vulnerable areas (i.e. BAL 40 and Flame Zone) are able to be relocated into buildings which will have a maximum radiant heat level of 29kW/m² and be built to the relevant Bushfire Attack Level. This will ultimately give the occupants a greater level of bushfire protection and resilience.

Access

The subject site has an existing internal road network with multiple connections to the existing public road network to the south and east which allows for multiple access points for emergency vehicles and evacuation opportunities for occupants away from the hazards.

The proposal includes new roads, which will provide access around majority of the proposed buildings. These roads will also enhance the existing access arrangements.

The proposed roads will meet the perimeter road requirements in the areas which the roads abut vegetation and the non-perimeter road requirements for the remaining area.

This upgrade in access along the main road will provide better access for the attending emergency services to access the identified vegetation and if required for occupants to evacuate away from the identified vegetation.

Improvements also include ensuring carriageways and curve radius of the access roads within the site can support fire-fighting appliances.

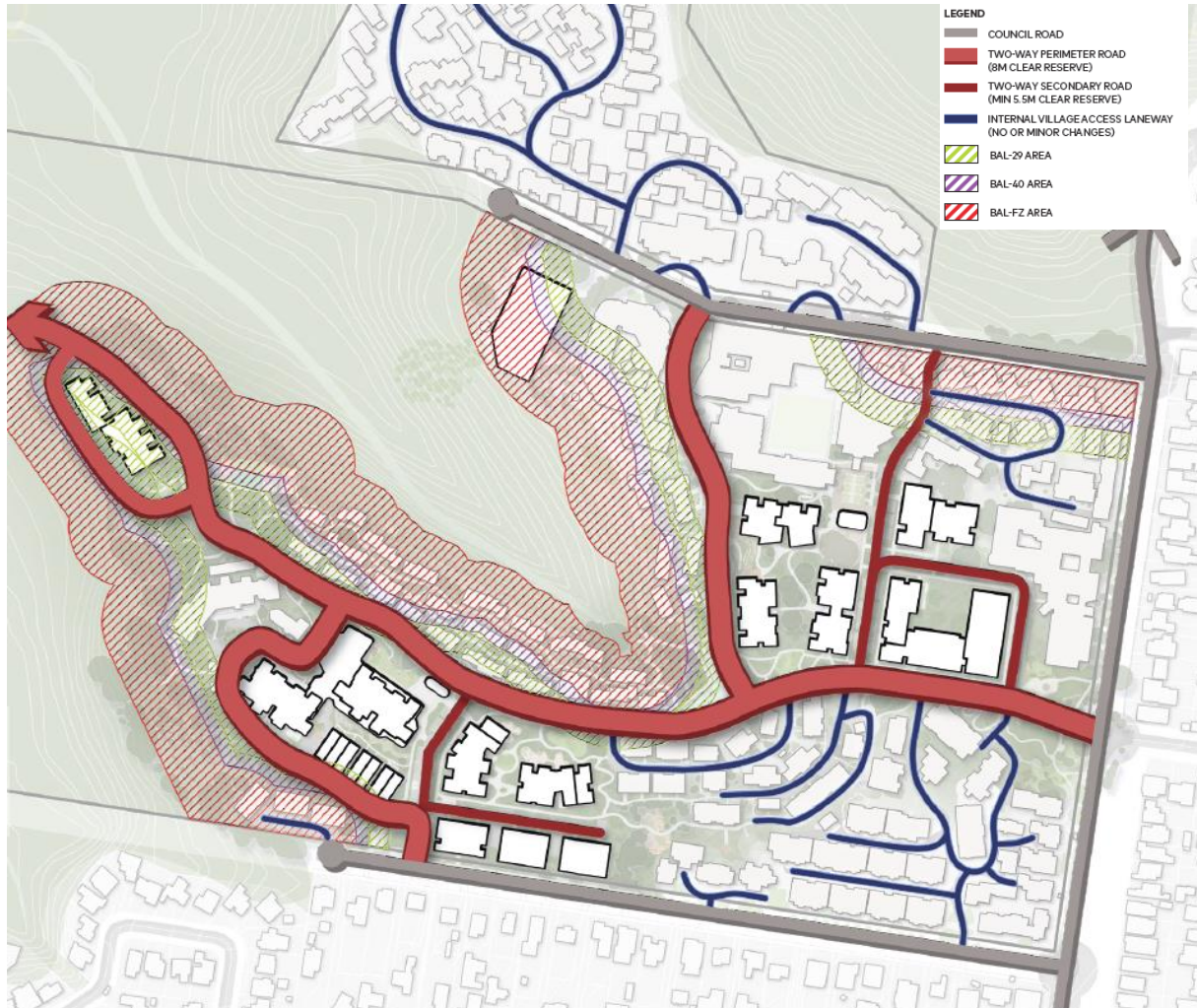


Figure 16: Plan showing the new overall proposed perimeter road network

Services – Water, electricity & gas

The subject property is connected to the existing towns water main for its commercial needs. Hydrants are available throughout the site. New hydrant system sizing, spacing and pressures within the proposed development are to comply with AS2419.1 – 2021.

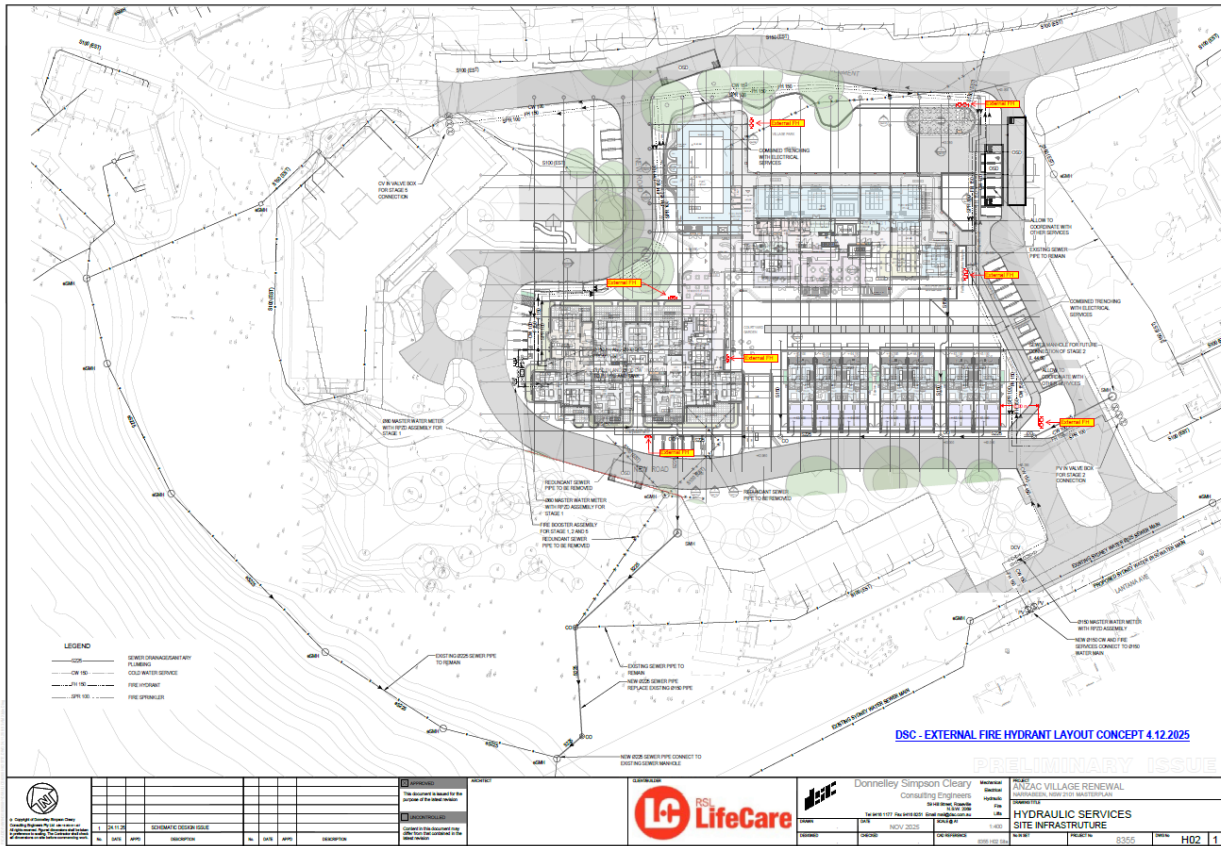


Figure 17: Plan showing the new external hydrants to the proposed Stage 1 development

The water supply is considered adequate for the replenishment of attending fire services and will satisfy Table 4 of the addendum to PBP.

The proposed buildings will have a new connection to the existing electrical network.

Bushfire Emergency Management Plan

The intent of the Bushfire Emergency Management and Evacuation Plan measure is to provide suitable emergency and evacuation arrangements for occupants of SFPP developments.

This assessment includes a recommendation that the Bushfire Emergency Management and Evacuation Plan be updated to capture the new buildings. This recommendation satisfies the acceptable solutions detailed in Table 6.8d of PBP.

7.04 Aim & Objectives

The following table details the aim and objectives of *Planning for Bush Fire Protection 2019* and the proposal's ability to comply.

Aim / Objective	Comment
<p><i>The aim of PBP is to provide for the protection of human life and minimise impacts on property from the threat of bush fire, while having due regard to development potential, site characteristics and protection of the environment.</i></p>	<p>With the inclusion of the recommendations made herein it is of our opinion that the aim of PBP has been satisfied.</p>
<p><i>(i) afford buildings and their occupants protection from exposure to a bush fire;</i></p>	<p>The location of the proposed buildings is such that the APZs will be increased and the site will have a better overall outcome.</p> <p>The proposed buildings will be built to the applicable Bushfire Attack Levels.</p> <p>In conjunction with the construction measures outlined herein the buildings and their occupants will be afforded the protection from exposure to a bushfire.</p>
<p><i>(ii) provide for a defensible space to be located around buildings;</i></p>	<p>The available APZs will provide a larger defensible space.</p> <p>The proposal provides managed land and good operational space around the proposed buildings.</p> <p>The existing and proposed roads in conjunction with the available Asset Protection Zones provide an appropriate defensible space.</p>
<p><i>(iii) provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings;</i></p>	<p>The location of the proposed buildings is such that the available APZs exceed the minimum required for new development under PBP.</p> <p>In conjunction with the application of the construction measures outlined herein the likely fire spread to the buildings is prevented.</p>

Aim / Objective	Comment
<p><i>(iv) ensure that appropriate operational access and egress for emergency service personnel and occupants is available;</i></p>	<p>Attending fire appliances have direct and comprehensive vehicle access to the identified hazards via the internal roads, existing service trails and public roads.</p> <p>Egress routes are available from the subject site via existing public roads away from the identified bushfire hazards.</p> <p>The proposed new roads will further enhance onsite fire-fighter access.</p>
<p><i>(v) provide for ongoing management and maintenance of bush fire protection measures, (BPMs); and</i></p>	<p>The Asset Protection Zones within the subject site are to be maintained in accordance with the NSW Rural Fire Service’s document ‘Standards for Asset Protection Zones’ and Appendix 4 of <i>Planning for Bush Fire Protection 2019</i>.</p>
<p><i>(vi) ensure that utility services are adequate to meet the needs of firefighters.</i></p>	<p>The existing internal hydrant network will be supplemented as required to service the proposed buildings.</p> <p>The spacing, design, sizing, flows and pressures of the new hydrant system will comply with AS2419.1-2021 for any new extent.</p>

It is of our opinion that the proposal can satisfactorily comply with the aim and objectives of Planning for Bush Fire Protection 2019.

8.0 Recommendations

The following recommendations are provided as the minimum necessary for compliance with Planning for Bush Fire Protection – 2019. Additional recommendations are provided to supplement these minimum requirements where considered necessary.

Asset Protection Zones

1. That at the commencement of construction and in perpetuity, all grounds within the 'Area >19kWm²' shown in Figure 13 shall be maintained as an Asset Protection Zone as detailed in the NSW Rural Fire Service's document 'Standards for Asset Protection Zones' and Appendix 4 of Planning for Bush Fire Protection 2019.
2. The remainder of the renewal area will be managed in accordance with the Landscape Master Plan prepared by Arcadia dated 7th January 2026.

Construction

3. New construction for the proposed buildings shall comply with the relevant Bushfire Attack Level as shown on the attached BAL Overlay under Australian Standard AS3959-2018 "Construction of buildings in bush fire-prone areas" Bushfire Attack Level and section 7.5 of "Planning for Bush Fire Protection" 2019.
4. All existing buildings within 100 metres of the vegetation will be upgraded to improve ember protection (as shown in Figure 12). This is to be achieved by enclosing all openings (excluding roof tile spaces) or covering openings with a non-corrosive metal screen mesh with a maximum aperture of 2mm. Where applicable, this includes openable windows, vents, weepholes and eaves. External doors are to be fitted with draft excluders.

Note: The upgrade is to be undertaken in stages commensurate with the works proposed within each stage of the development as shown in Figure 12.

Emergency Management

5. That prior to occupation of each stage the bushfire emergency management and evacuation plan is prepared consistent with the NSW Rural Fire Service *Guide to developing a Bush Fire Emergency Management and Evacuation Plan*.

Services (where applicable)

Water:

6. That any new internal hydrant system is to comply with the requirements detailed in Table 6.8c of *Planning for Bush Fire Protection 2019*, specifically:
 - fire hydrant spacing, design and sizing comply with the relevant clauses of AS 2419.1:2021;
 - hydrants are not located within any road carriageway;
 - fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2021.
 - all above-ground water service pipes external to the building are metal, including and up to any taps.
 - fire hose reels are constructed in accordance with AS/NZS 1221:1997 Fire hose reels, and installed in accordance with the relevant clauses of AS 2441:2005 Installation of fire hose reels.

Electricity:

7. Any new electrical services must comply with Table 6.8c of *Planning for Bush Fire Protection 2019*, specifically:
 - where practicable, electrical transmission lines are underground.
 - where overhead electrical transmission lines are proposed:
 - lines are installed with short pole spacing (30 metres), unless crossing gullies, gorges or riparian areas; and
 - no part of a tree is closer to a power line than the distance set out in *ISSC3 Guideline for Management Vegetation Near Power Lines*.

Gas:

8. Any new gas services must comply with Table 6.8c of *Planning for Bush Fire Protection 2019*, specifically:
 - reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 - *The storage and handling of LP Gas*, the requirements of relevant authorities, and metal piping is used;
 - all fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side;
 - connections to and from gas cylinders are metal;
 - if gas cylinders need to be kept close to the building, safety valves are directed away from the building and at least 2m away from any combustible material, so they do not act as a catalyst to combustion;
 - polymer-sheathed flexible gas supply lines to gas meters adjacent to buildings are not to be used; and
 - above-ground gas service pipes external to the building are metal, including and up to any outlets.

Access

9. All proposed roads shall comply with the General Access Requirements as detailed in Table 6.8b of *Planning for Bush Fire Protection* 2019, specifically:
 - SFPP access roads are two-wheel drive, all-weather roads;
 - Access is provided to all structures
 - traffic management devices are constructed to not prohibit access by emergency services vehicles;
 - one way public access roads are no less than 3.5 metres wide and have designated parking bays with hydrants located outside these to ensure accessibility to reticulated water for fire suppression.
 - the capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes); bridges/ causeways are to clearly indicate load rating.
 - hydrants are located outside of parking reserves and road carriageways to ensure accessibility to reticulated water for fire suppression;
 - hydrants are provided in accordance with the relevant clauses of AS 2419.1:2021 - Fire hydrant installations System design, installation and commissioning;
10. That the proposed roads shown as Perimeter Roads in Figure 16 shall comply with the requirements for Perimeter Roads as detailed in Table 6.8b of PBP, specifically:
 - are two-way sealed roads;
 - minimum 8m carriageway width kerb to kerb;
 - parking is provided outside of the carriageway width;
 - hydrants are located clear of parking areas;
 - curves of roads have a minimum inner radius of 6m;
 - the maximum grade road is 15 degrees and average grade of not more than 10 degrees;
 - the road crossfall does not exceed 3 degrees; and
 - a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided.
11. That all other new roads shall comply with the requirements for Non-Perimeter Roads as detailed in Table 6.8b of PBP, specifically:
 - minimum 5.5m carriageway width kerb to kerb;
 - parking is provided outside of the carriageway width;
 - curves of roads have a minimum inner radius of 6m;
 - the maximum grade road is 15 degrees and average grade of not more than 10 degrees;
 - the road crossfall does not exceed 3 degrees; and
 - a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided.

9.0 Conclusion

Through the State Significant Development Application (SSDA) process, RSL Lifecare is seeking to upgrade and enhance existing conditions on site, as well as improve and plan for amenities and facilities to support the current and future occupants.

In this instance the site is depicted on Northern Beaches Council's Bushfire Prone Land Map (BPLM) as containing designated Category 1 and 2 Vegetation and Vegetation Buffer. The site is therefore considered 'bushfire prone'.

In relation to this application item 20 of the issued Secretary's Environmental Assessment Requirements (SEARs) requires a bush fire assessment that details proposed bush fire protection measures and demonstrates compliance with Planning for Bush Fire Protection 2019 (PBP).

In accordance with the bushfire safety measures contained in this report, and consideration of the site specific bushfire risk assessment it is our opinion that when combined, they will provide a reasonable and satisfactory level of bushfire protection to the subject development.

It is of our opinion that the proposal satisfies all relevant specifications and requirements of PBP.

We are therefore in support of the development.

Should you have any enquiries regarding this project please contact our office.

Prepared by
Building Code & Bushfire Hazard Solutions P/L



Andrew Muirhead

Senior Bushfire Consultant
Graduate Diploma in Bushfire Protection WSU
Bachelor of Engineering Technology Major in Civil UniSQ
FPA Australia BPAD Level 3 Accredited Practitioner
BPAD Accreditation No. BPAD46966



Reviewed by
Building Code & Bushfire Hazard Solutions P/L



Stuart McMonnies

Director / Manager Bushfire Section
G. D. Design in Bushfire Prone Areas.
Certificate IV Fire Technology
FPA Australia BPAD Level 3 Accredited Practitioner
BPAD Accreditation No. BPAD9400



10.0 Annexure 01

List of Referenced Documents

Australian Building Codes Board (2022). *National Construction Code Volume One - Building Code of Australia*. ABCB

AJC Architects (2025) *Concept Master Plan & Stage 1 Design Report* date 10 November 2025)

Arcadia (2026) *Landscape Masterplan* (Project 25-1104, Date 7th January 2026)

ELVIS -Elevation -Foundation Spatial Data. Elevation.fsd.org.au. Available at: <http://elevation.fsd.org.au/>

Keith, D. (2004). "Ocean Shores to Desert Dunes" Department of Environment and Conservation, Sydney

NSW Department of Planning and Environment (2019). *Planning Portal*. Accessed at: <https://www.planningportal.nsw.gov.au/>

NSW Rural Fire Service (2019). *Planning for Bush Fire Protection. A Guide for Councils, Planners, Fire Authorities and Developers*.

NSW Rural Fire Service (2022). Addendum to *Planning for Bush Fire Protection*.

Rural Fire Service NSW (2005). *Standards for Asset Protection Zones*

Standards Australia (2018). *AS3959:2018 Construction of buildings in bushfire-prone areas*.

Standards Australia (2014). *AS/NZS 1596 The storage and handling of LP Gas*

Acknowledgements to:

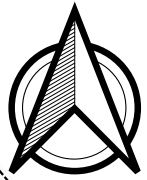
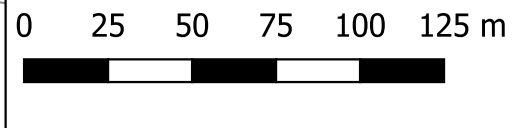
Geoscience Australia
Nearmap
Street-directory.com.au

Attachments

Attachment 01: BAL Overlay

Attachment 02: Tree Survey

The APZ Area is required to be managed as an Asset Protection Zone in accordance with Appendix 4 of Planning for Bush Fire Protection.



Bushfire Hazard Solutions
 (Pty. Limited) ABN 19 057 337 774
 PO Box 124, Berowra NSW 2081
 Telephone: (02) 9457 6530
 www.bushfirehazardsolutions.com.au



Legend

- Development Footprint
- Development Footprint APZ
- BAL FZ
- BAL 40
- BAL 29
- BAL 19
- BAL 12-5

BAL Overlay

CBHS Ref: 240063
 Drawn by: AM
 Dated: 25/01/2026
 Issue: 9
 Client: RSL LifeCare
 Address: Narrabeen Village

APPENDIX 2 - TREE LOCATION PLANS

NOTE: MUST BE READ IN CONJUNCTION WITH ARBORICULTURAL IMPACT ASSESSMENT

CPS

CREATIVE PLANNING SOLUTIONS

LEVEL 3
397 RILEY STREET
SURRY HILLS NSW 2010
PO BOX 1074 BROADWAY NSW 2007
TEL: + (61) 2 8039 7461
INFO@CPSPLANNING.COM.AU
CPSPLANNING.COM.AU



Issue Code	Issue Description	By	Chk	Date
E CA	UPDATED AP2	JHG	GT	11.02.26
D CA	UPDATED DRAFT	JHG	GT	16.12.25
C CA	UPDATE FOR DRAFT	JHG	GT	24.11.25
B CA	UPDATED 10/50	JHG	GT	22.09.25
A CA	FOR REVIEW	SZ	GT	15.09.25

PRE - Preliminary CA - Council Approval T - Tender CON - Construction

PROJECT

ANZAC VILLAGE

4 COLOOLI ROAD,
NARRABEEN

DRAWING TITLE

TREE LOCATION PLAN
SITE CONTEXT PLAN

CLIENT



Drawn : SZ
Designed :
Project No. : G593
Bar Scale



1:2500 @ A3
SHEET NUMBER
G593_TLP_00
REVISION
E