



# Building Code & Bushfire Hazard Solutions

(Pty. Limited) ABN 19 057 337 774  
PO Box 124, Berowra NSW 2081  
Telephone: (02) 9457 6530 Facsimile: (02) 9457 6532  
[www.bushfirehazardsolutions.com.au](http://www.bushfirehazardsolutions.com.au)



TSA Management  
Level 15, 207 Kent Street  
SYDNEY NSW 2000

13<sup>th</sup> September 2019  
Our Ref. 171272

Attn: Mr Oliver He  
By email: [oh@tsamanagement.com.au](mailto:oh@tsamanagement.com.au)

**Re: PROPOSED GREENWICH HOSPITAL REDEVELOPMENT  
STATE SIGNIFICANT DEVELOPMENT (SSD 8669)  
95 RIVER ROAD GREENWICH  
BUSHFIRE RESPONSE**

Dear Oliver,

This letter has been prepared by Building Code and Bushfire Hazard Solutions (BCBHS) in response to the following concern raised by the Department of Planning and Environment (DPE) regarding the above mentioned application:

*“The Department considers the extent of tree removal proposed to facilitate the development and the requirement for almost the entire site to be maintained as an Inner Protection Area for bush fire protection to be incompatible with the surrounding land uses and character of the area.”*

BCBHS prepared the Bushfire Hazard Assessment Report (ref 171272, dated 21<sup>st</sup> March 2018) which accompanied this State Significant Application (SSD).

We have been provided a copy of the NSW Rural Fire Service submission (ref D19/482, dated 14<sup>th</sup> March 2019) to the DPE in relation to this matter which includes seven (7) recommended conditions of consent. Of these recommended conditions two (2) relate to vegetation management / removal, these being:

1. *That all land within the subject site, excluding the rainforest vegetation in the southwest corner (see Image 01 p13) and the heritage land associated with Pallister House (being Lot 4 DP 584287), as an Inner Protection Area (IPA) as outlined within section 4.1.3 and Appendix 5 of Planning for Bush Fire Protection 2006 and the NSW Rural Fire Service's document Standards for asset protection zones.*
2. *The land within Lot 4 DP 584287, associated with Pallister House, shall be subject to a specific Vegetation Management Plan (VMP) to ensure that it does not pose a bush fire threat to the proposed development and adjoining properties. The Vegetation Management Plan (VMP) shall include, but not be limited to, the following for the ongoing management of the land:*
  - > *Ground fuel shall be managed to low level grasses less than 100 mm in height;*
  - > *There shall be no surface fuel accumulation (bark leaf and twigs) greater than 4 t/ha;*
  - > *Shrub gardens shall be restricted to no more than 20% of the area; and,*
  - > *A 2 metre- 5 metre separation distance shall be provided from any tree limb to a shrub garden.*

Following a review of the NSW RFS submission we would like to highlight that there is no requirement for almost the entire site to be maintained as an Inner Protection Area (IPA).

The RFS have excluded the rainforest vegetation in the southwest corner of the subject site and the heritage land associated with Pallister House (being Lot 4 DP 584287) from the requirement to be maintained as an IPA, consistent with the recommendations contained in the Bushfire Hazard Assessment Report.

In relation to the rainforest area the RFS have included a reference to 'see Image 01 p13', which given their submission is two (2) pages it is reasonable to assume this reference is in relation to the submitted Bushfire Hazard Assessment Report. The submitted Bushfire Hazard Assessment Report includes a similar recommendation and an image of page 13 which defines the rainforest area.

It is also noted that the recommendation in the Bushfire Hazard Assessment Report has a typographical error when referencing the image of page 13, referring to Image 01 rather than Image 07. This typographical error was replicated in the RFS submission.

In relation to the heritage land associated with Pallister House (being Lot 4 DP 584287) the RFS have excluded this allotment from their recommendation to be maintained as an IPA, but included specific objectives that are to be nominated in a specific Vegetation Management Plan.

As this allotment is not required to comply with the standards of an IPA there is no requirement to achieve a 15% canopy foliage cover or to provide a 2 – 5 metre separation between canopies. The only recommended objective relating to tree management on this allotment is that to provide a 2 – 5 metre separation from tree limbs to a shrub garden.



Image 01: Aerial image showing Lot 4 DP 584287 highlighted in yellow

Should you require any further information or clarification please do not hesitate to contact our office.

Prepared by  
Building Code & Bushfire Hazard Solutions



**Stuart McMonnies**

Manager Bushfire Section

G. D. Design in Bushfire Prone Areas.

Certificate IV Fire Technology

Fire Protection Association of Australia BPAD – L3 Accredited Practitioner

Certification number – BPAD9400

