



Member of the Fire Protection Association of Australia

Friday, 9 August 2024.

- **Purpose;** Response to RFS request for further information.
- **Address;** 11 Moresby Place Allambie Heights.
- **Lot and DP number;** lot 11, DP28394
- **Referenced documents;** RFS letter to council dated 19th July 2024, Allenby Park Fire Regime Management Plan" written by Eco-logical Australia dated 2006, draft Northern Beaches Bushfire Risk Management Plan.

RFS Development Control.

Dear Sir/Madam.

Bushfire Planning Services has been requested to provide a response to the RFS request for further information dated 19<sup>th</sup> of July 2024.

The RFS has requested was;

*"Additional information relating to the use of APZs on Council owned land is required, to consider these as part of the setbacks to determine bush fire attack levels (BALs), in accordance with section 3.2.6 of PBP 2019".*

*"Before APZs can be accepted for these types of situations, it must be demonstrated that a management regime is in place to ensure ongoing compliance with APZ requirements."*

Bushfire Planning Services has been in contact with council in an attempt to clarify the management regime of the area, unfortunately, due to time constraints imposed by council on responding to this matter, at the time of writing there has been no further response from council.

It is considered that the following points apply;

- The area in question (the APZ) has historically been managed by council, it is still managed by council, and it is reasonable to expect that this management will continue into the future.
- The council has an obligation under section 63 of the Rural Fires Act to continue to manage the APZ to *"minimise the danger of the spread of bush fire on or from that land"*.
- The area is an important APZ for not only this proposal but many other houses with frontage onto the APZ and as such ongoing management is considered highly likely to occur.
- Anecdotally I have been informed that the area has been managed as it has been for the last 20 years at least. When I spoke to the RFS control centre at Terry Hills I was told that the area has *"been managed forever"*.

- The document “*Allenby Park Fire Regime Management Plan*” written by Eco-logical Australia dated 2006 identifies the APZ as APZ 2 further enforcing the historical consideration of the area as an APZ.
- The current draft document “*Bushfire Risk Management Plan*” composed by the Northern Beaches Bushfire Management Committee identifies the area as a SF.217 with a corresponding APZ in the location of the current APZ, this shows the intention for ongoing management of the area.

The idea of assured management of an area in perpetuity is an unrealistic expectation, no government or private sector entity can or would provide this type of open-ended guarantee.

What is shown for the area of APZ being claimed as managed land for this proposal is that the area has a long history of management with future plans to continue this management through a management plan, in addition, that the land manager has a duty to continue to manage the land to protect the neighbouring properties.

It is a reasonable assumption to make that the APZ area will remain in place for the foreseeable future to protect the private assets along the interface and in turn to protect the vegetation in the nearby park from the potential spread of fire from the built area into Allenby Park.

Should any further clarification be necessary please do not hesitate to contact me.

Yours Sincerely



Matthew Willis

*Grad Dip Planning for Bushfire Prone Areas (FPAA BPAD Level 3 BPD-PA 09337)*  
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