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PO Box 363 Balgowlah, NSW, 2093

Bush Fire Assessment Report

In relation to a proposed development at:

12 Koobilya Street, Seaforth, NSW

This assessment has been prepared and certified by: Matthew Toghill. BPAD certified practitioner	Mh.
FPAA Accreditation No: BPAD31642 Report No: 12Koo-01 Date: 04/10/2023	
Architectural plans provided by:	G.J Gardner Homes
	Job No: 230398
	Dated: 25.09.2023 (No. B)

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Executive Summary

The purpose of the report is to determine the category of bushfire attack and subsequent construction standard for the proposed new class 1a dwelling at No. 12 Koobilya Street, Seaforth, NSW.

The site had been identified as 'bush fire prone land' for the purpose of Section 146 of the *Environmental Planning and Assessment Act 1979* and the Legislative requirements for building on bush fire prone lands are applicable.

The proposed development is in infill development as defined within Chapter 7 of *Planning for*Bushfire *Protection 2019* and this report has been prepared in accordance with the requirements of Section 4.14 of the Environment Planning and Assessment Act.

This assessment includes an analysis of the hazard, threat and subsequent risk of the development proposal and provides recommendations that satisfy the Objective and Performance requirements of the Building Code of Australia, Planning for Bushfire Protection 2019 [PBP] and Australian Standard AS3959, 2018.

Following a site assessment, it was determined the distance of the development from the closest hazard would keep the Bushfire Attack Level (BAL) to BAL-19 in accordance with the methodology described in PBP. The development also meets performance criteria as set out in chapter 7 of PBP in relation to APZ's, siting and design, construction standards, access and egress requirements, water and utility services and landscaping.

1. Description of the subject property

Property address: Lot 137/-/DP35319, No. 12 Koobilya Street, Seaforth

Local Government Area: Northern Beaches

The development site is a residential block on the southern side of Koobilya Street. The following sections 4-8 describe in detail the vegetation, slope, access and egress, availability of water supplies and environmental considerations for the site.



Figure 1: Location of the subject site



Figure 2: Bushfire prone land map showing the location of the subject site.

2. Development Proposal and Building Classification

The development proposal is for the construction of a new class 1a dwelling.

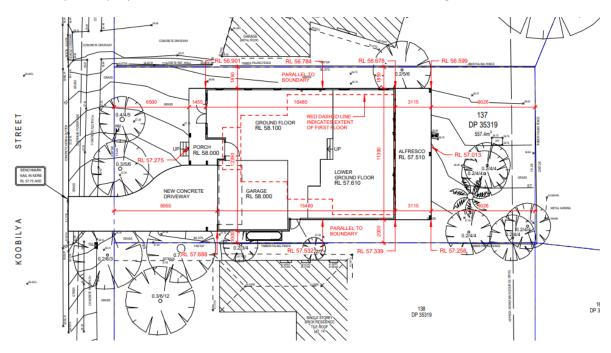


Figure 3: Ground floor plan.

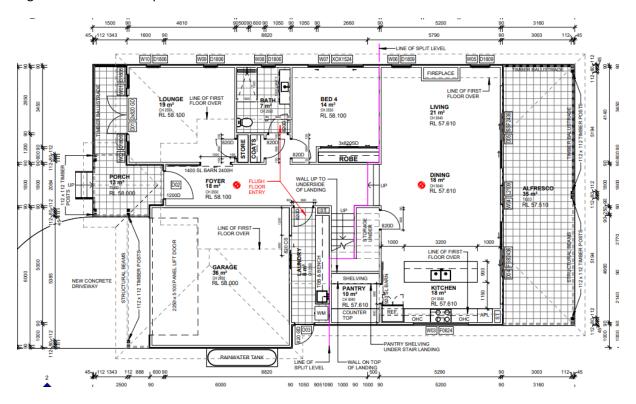


Figure 4: Ground floor plan

3. Classification of the Vegetation on and surrounding the site

For the purpose of a Bush Fire Risk Assessment, vegetation within 140m of the development is assessed and classified. In this instance there is an area of Category 2 vegetation to the north of the site which is of most significance. Within this area there is a small parcel of vegetation that surrounds the Seaforth Community Centre before it expands to a larger area behind the Community Centre and Tennis Courts. With reference to Part A1.11.1 of PBP, as there is a very limited run of fire within the vegetation surrounding the Community Centre, for the purpose of this assessment will be classified as a 'Remnant'. The vegetation formation beyond this area consists of Sydney Coastal Dry Sclerophyll Forest, which for the purpose of this assessment will be classified as 'Forest'.



Figure 5: Aerial photo showing vegetation within 140m of the site.

4. Assessment of effective slope



Legend: Direction of effective slope

Figure 7: Contour map.

Transect Line	Effective slope group as per PBP	
T1	Downslope >0-5 degrees	
T2	Downslope >0-5 degrees	

5. Access and Egress

The site has direct access to Koobilya Street, which is a public road. Access and egress for emergency vehicles appears adequate. *Planning for Bushfire Protection 2019* requires no specific access requirements in an urban area where a 70m, unobstructed path can be demonstrated between the most distant external part of the dwelling and the nearest part of the public access road (where the speed limit is not greater 70kph) that supports operational use of emergency firefighter vehicles. As such, there are no formal property access requirements.

6. Adequacy of water supply

The area has reticulated water supply and hydrants are spaced at a regular distance along Koobilya Street.

7. Features that may mitigate the impact of a high intensity bushfire

There are no significant features on or adjoining the site that may mitigate the impact of a high intensity bushfire on the proposed development.

8. Environmental impact of any proposed bushfire protection measures.

The scope of this report has not been to provide an environmental assessment. However, the bushfire protection measures that are proposed will have no adverse environmental effects. All protection measures are either within the boundaries of the allotment or part of the constructed building.

9. Bushfire Risk Assessment



Table 1; Determination of the category of bushfire attack for the dwelling, and subsequent required building standards (reference Table A1.12.5 *Planning for Bushfire Protection 2019*).

Transect	Distance to	Vegetation	Assessment of effective	FDI	Bushfire
	classified	Classification	slope		Attack Level
	vegetation				
T1	22.94m (16.44m offsite, 6.50m onsite)	Remnant (Rainforest)	Downslope >0-5 degrees	100	BAL-19
T2	61.52m (55.02m offsite, 6.50m onsite)	Forest	Downslope >0-5 degrees	100	BAL-12.5

<u>Summary:</u> Based upon the relevant provisions of PBP the anticipated maximum radiant heat attack for the new dwelling is <19kW/m2 and the subsequent minimum construction standard is BAL-19 AS 3959- 2018.

The principle of shielding allows for the next lower BAL level than that determined for the site to be applied to an elevation of the building where the elevation is not exposed to the source of bushfire attack. In this instance, the north, east and west elevations must be BAL-19 and the south elevation can be reduced by one level to BAL-12.5.

[There can only be a reduction of one BAL and this can only apply to the elevation directly opposite the exposed side].

10. The extent to which the construction conforms or deviates from Chapter 7 of 'Planning for Bushfire Protection 2019'

Performance Criteria	How this development meets acceptable solutions
The intent may be achieved where:	
In relation to APZ's: -Defendable space is provided onsiteAn APZ is provided and maintained for the life of the building.	Defendable space is provided on all sides of the building. Asset protection zones are provided for on site and by adjoining development and public roads.
In relation to construction standards: It is demonstrated that the proposed building can withstand bushfire attack in the form of wind, smoke, embers, radiant heat and flame contact.	Construction standards have been recommended in accordance with the requirements of <i>Planning for Bushfire Protection 2019</i> and <i>AS 3959-2018 Construction of buildings in bushfire prone areas</i> .
In relation to access requirements: Safe operational access is provided [and maintained] for emergency service personnel in suppressing a bushfire while residents are seeking to relocate, in advance of a bushfire.	This site has direct access to public roads, and the access and egress for emergency vehicles and evacuation appears to be adequate.
In relation to water and utility services: -Adequate water is provided for fire fighting operations.	The area has reticulated water supply and the nearest street hydrant is within the minimum required distance from the most distant point of the subject site in accordance with the requirements of PBP and AS2419.1 2005.
In relation to landscaping: It is designed and managed to minimise flame contact and radiant heat to buildings, and the potential for wind driven embers to cause ignition.	The subject site, where not built on, is considered part of the Asset Protection Zone (APZ) for the dwelling. Appendix 4 of <i>Planning for Bushfire Protection 2019</i> outlines the requirements for landscaping and property maintenance.
In relation to emergency and evacuation planning	It is advised the residents should complete a <i>Bushfire Survival Plan</i> as formulated by the NSW Rural Fire Service and Fire and Rescue NSW.

11. Assessment of the extent to which the development can conform to the Aim and Objectives of 'Planning for Bush Fire Protection 2019' (PBP).

Aim	Meets Criteria	Comment
The aim of PBP is to provide for the protection of human life and minimise the impacts on property from the threat of bushfire, while having due regard to development potential, site characteristics and the protection of the environment.	Yes	This threat assessment has determined that the category of bushfire attack for the proposal is BAL-19 and not within the Flame Zone. Construction standards BAL-19 have been recommended. Landscaping, defendable space, access and egress, emergency risk management and construction standards are all in accordance with the requirements of PBP 2019 and the aim has been achieved.
Objectives	Meets Criteria	Comment
Afford building and their occupants protection from exposure to bushfire.	Yes	This threat assessment has determined that the category of bushfire attack for the proposal is BAL-19 and not within the Flame Zone. Construction standards BAL-19 have been recommended.
Provide for a defendable space to be located around buildings	Yes	Defendable space can be provided on all sides of the buildings.
Provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to other buildings	Yes	Appropriate separation can be provided by a combination of onsite APZ and adjoining developed sites and public roads.
Ensure that appropriate operational access and egress for emergency services personnel and occupants is available.	Yes	This site has direct access to public roads, and the access and egress for emergency vehicles and evacuation appears to be adequate.
Provide for ongoing management and maintenance of BPM's	Yes	All BPM's are provided within the subject site or adjoining managed residential properties and public roads. BPM's can be managed and maintained by the occupants.
Ensure that utility services area adequate to meet the needs of firefighters	Yes	Utility services can be provided in accordance with Table 7.4a of PBP

12. Recommendations

The following recommendations are made for the bushfire protection measures for the proposed construction of a new class 1a dwelling at No. 12 Koobilya Street, Seaforth, NSW and are based upon the relevant provisions of the NSW RFS guideline entitled *Planning for Bushfire Protection 2019*.

1) Construction standard. South elevation	All new construction shall comply with a minimum standard of section 3 [construction general] and section 5 (BAL-12.5), AS3959-2018 and Chapter 7 of Planning for Bushfire Protection 2019.
2) <u>Construction</u> <u>standard.</u> Roof, north, east and west elevations	All new construction shall comply with a minimum standard of section 3 [construction general] and section 6 (BAL-19), AS3959-2018 and Chapter 7 of Planning for Bushfire Protection 2019.
3) Asset Protection Zones	-At the commencement of building work and in perpetuity the entire site shall be managed as an APZ in accordance with the Asset protection Zone principles of Appendix 4 of PBP 2019All new landscaping should be designed in accordance with the Asset protection Zone principles of Appendix 4 of PBP 2019.
4) Emergency Risk Management	It is advised the residents should complete a <i>Bushfire Survival Plan</i> as formulated by the NSW Rural Fire Service and Fire and Rescue NSW. An emergency evacuation is not recommended as a condition of consent.
5) Adjacent Structures [class 10a & 10b]	Where Class 10a & 10b structures are within 6m from a dwelling in bush fire prone areas it must be built in accordance with the NCC.
6) Water supplies	Reticulated water supply is located on the adjoining road at regular intervals and is easily accessible. No additional water supplies have been recommended.
7) Fences and gates	All fences in bush fire prone areas should be made from either hardwood or non-combustible material. However, in circumstances where the fence connects directly to the dwelling, or in areas of BAL-29 or greater, they should be made of non-combustible material.

13. Summary

This report consists of a bushfire risk assessment for proposed construction of a new class 1a dwelling at No. 12 Koobilya Street, Seaforth, NSW.

The report concludes that the proposed development is on designated bushfire prone land and the legislative requirements for development of bushfire prone areas are applicable. The proposed development will be constructed to the minimum standard required in accordance with the guidelines of *Planning for Bushfire Protection 2019* and *AS 3959-2018 Construction of buildings in bushfire prone areas.*

This report has considered all of the elements of bushfire attack and provided the proposed development is constructed in accordance with the recommendations of Section 12 of this report, it is my considered opinion that the development satisfies the Objectives and Performance requirements of the *Building Code of Australia, Planning for bushfire Protection 2019 and Australian Standard AS3959, 2018.*

Note: Not with standing the precautions adopted, it should always be remembered that bushfires burn under a wide range of conditions and an element of risk, no matter how small always remains, and although the standard is designed to improve the performance of such buildings, there can be no guarantee, because of the variable nature of bushfires, that any one building will withstand a bushfire attack on every occasion. This report is a Bushfire Hazard Assessment that provides the required information to assist Local Councils and the Rural fire Service in determining compliance in accordance with Planning for Bushfire Protection 2019 and AS3959, 2018. The local Council is the final consenting authority and the construction of the building must comply with the recommendations included in the council's conditions of consent.

Mh.

Matthew Toghill- Bushfire Consultant
Accreditation No: BPAD31642
Grad Cert in Bushfire Protection, UWS 2012
Certificate IV Building and Construction
Certificate III in Public Safety (firefighting and emergency operations)



14. References

Australian Building Codes Board

Building Code of Australia Volume 1 & 2 Canprint

Australian Building Codes Board [2001]

Fire Safety Engineering Guidelines
Edition 2001
ABCB Canberra

D. Drysdale D. [1998]

Introduction to Fire Dynamics 2nd Edition John Wiley & Sons Ltd

NSW Government Environmental Planning and Assessment Act [1979]

Part 79BA-Consultation and development consent- Certain bushfire prone land NSW Government Printer

Planning for Bushfire Protection 2019

A guide for Councils, Planners, Fire Authorities and Developers

This document provides the necessary planning considerations when developing areas for residential use in residential, rural residential, rural and urban areas when development sites are in close proximity to areas likely to be affected by bushfire events and replaces Planning for Bushfire Protection 2006.

This document is essential reading. Download a copy from the RFS website or purchase a copy through the NSW Government online shop or phone 9228 6333.

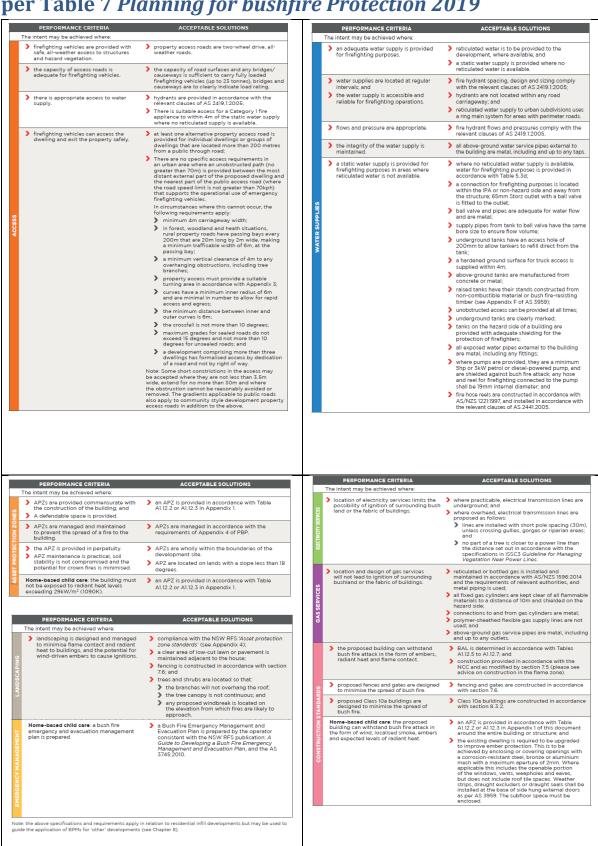
Ramsay C & Rudolph L [2003]

Landscape and building design for bushfire prone areas CSIRO Publishing

Standards Australia [2018]

Australian Standards 3959 Australian Building Code Board

Appendix 1: Performance criteria and acceptable solutions as per Table 7 *Planning for bushfire Protection 2019*



Appendix 2: 7.5.2 NSW State Variations under G5.2(a)(i) and 3.10.5.0(c)(i) of the NCC

Certain provisions of AS 3959 are varied in NSW based on the findings of the Victorian Bush Fires Royal Commission and bush fire industry research.

The following variations to AS 3959 apply in NSW for the purposes of NSW G5.2(a)(i) of Volume One and NSW 3.10.5.0(c)(i) of Volume Two of the NCC; clause 3.10 of AS 3959 is deleted and any sarking used for BAL-12.5, BAL-19, BAL-29 or BAL-40 shall:

- be non-combustible; or
- comply with AS/NZS 4200.1, be installed on the outside of the frame and have a flammability index of not more than 5 as determined by AS 1530.2; and
- clause 5.2 and 6.2 of AS 3959 is replaced by clause 7.2 of AS 3959, except that any wall
 enclosing the subfloor space need only comply with the wall requirements for the respective
 BAL; and
- clause 5.7 and 6.7 of AS 3959 is replaced by clause 7.7 of AS 3959, except that any wall
 enclosing the subfloor space need only comply with the wall requirements for the respective
 BAL; and
- fascias and bargeboards, in BAL-40, shall comply with:
- clause 8.4.1(b) of AS 3959; or
- clause 8.6.6 of AS 3959.

The interpretation of this variation is:

<u>Enclosed subfloors</u>: For subfloor supports there are no requirements for supporting posts, columns, stumps, stringers piers and poles for subfloor supports for BAL 12.5 and BAL 19 when the subfloor space is enclosed with a wall that complies with the determined BAL level for the site.

<u>Unenclosed subfloors</u>: For unenclosed subfloor supporting posts, columns, stumps, stringers piers and poles the requirements are upgraded from BAL 12.5 and BAL 19 to BAL 29 level.

<u>Enclosed verandas</u>: There are no requirements for supporting posts, columns, stumps, stringers piers and poles for verandas, decks, steps and landings when the subfloor space is enclosed with a wall that complies with the determined BAL level for the site.

<u>Unenclosed verandas</u>: The requirements for supporting posts, columns, stumps, stringers piers and poles for verandas, decks, steps, and landings are upgraded from BAL 19 and BAL 12.5 to BAL 29 level.

For unenclosed subfloors of the main building or verandas, decks, steps and landings for BAL 12.5, 19 and BAL29 supporting posts, columns, stumps, stringers piers and poles shall be:

- 1. A non-combustible material; or
- 2. A Bushfire resistant timber; or
- 3. A combination of 1 and 2

Acceptable timber species:

Black-butt, Turpentine, Silver Top Ash, Spotted Gum, Red Iron Bark, Kwila, Red River Gum

Sarking: To comply with the NSW State variation any sarking used for BAL 12.5 shall:

- Be Non-combustible; or
- Comply with AS/NZ 4200.1 be installed on the outside of the frame and have a flammability index of not more than 5 as determined by AS1530.2

Appendix 3: Asset Protection Zones (APZ's)

A4.1.1 Inner Protection Areas (IPAs)

The IPA is the area closest to the building and creates a fuel-managed area which can minimise the impact of direct flame contact and radiant heat on the development and act as a defendable space. Vegetation within the IPA should be kept to a minimum level. Litter fuels within the IPA should be kept below 1cm in height and be discontinuous.

In practical terms the IPA is typically the curtilage around the building, consisting of a mown lawn and well maintained gardens.

When establishing and maintaining an IPA the following requirements apply:

Trees

- tree canopy cover should be less than 15% at maturity;
- trees at maturity should not touch or overhang the building;
- lower limbs should be removed up to a height of 2m above the ground;
- tree canopies should be separated by 2 to 5m; and
- preference should be given to smooth barked and evergreen trees.

Shrubs

- create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings should be provided;
- shrubs should not be located under trees;
 shrubs should not form more than 10% ground
- shrubs should not form more than 10% ground cover; and
- clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.

Grass

- grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and
- > leaves and vegetation debris should be removed.

A4.1.2 Outer Protection Areas (OPAs)

An OPA is located between the IPA and the unmanaged vegetation. It is an area where there is maintenance of the understorey and some separation in the canopy. The reduction of fuel in this area aims to decrease the intensity of an approaching fire and restricts the potential for fire spread from crowns; reducing the level of direct flame, radiant heat and ember attack on the IPA.

Because of the nature of an OPA, they are only applicable in forest vegetation.

When establishing and maintaining an OPA the following requirements apply:

Trees

- > tree canopy cover should be less than 30%; and
- > canopies should be separated by 2 to 5m.

Shrubs

- > shrubs should not form a continuous canopy; and
- shrubs should form no more than 20% of ground cover.

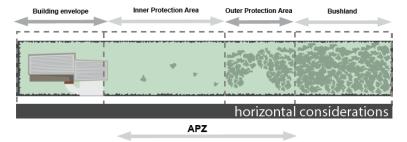
Gras

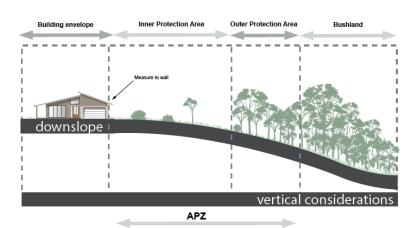
- grass should be kept mown to a height of less than 100mm; and
- > leaf and other debris should be removed.

An APZ should be maintained in perpetuity to ensure ongoing protection from the impact of bush fires. Maintenance of the IPA and OPA as described above should be undertaken regularly, particularly in advance of the bush fire season.

Figure A4.1

Typlical Inner and Outer Protection Areas.





Abbreviations and definitions

AS 3959	Australian Standard AS 3959:2018 Construction of buildings in bush
	fire-prone areas
AS 2419.1:2005	Australian Standard AS 2419.1:2005 Fire hydrant installations System
	design, installation and commissioning
AS 2441:2005	Australian Standard AS 2441:2005 Planning for emergencies in facilities
APZ	Asset Protection Zone
BAL	Bushfire Attack Level
BFPL	Bushfire prone land
BRPL Map	Bushfire prone land map
BPM's	Bushfire protection measures
BFSA	Bushfire safety authority
DA	Development application
DCP	Development Control Plan
EP&A Act	Environmental Planning and Assessment Act 1979
FDI	Fire Danger index
FFDI	Forest Fire Danger Index
IPA	Inner Protection Area
kW/m2	Kilowatts per metre squared
LGA	Local government area
NASH	Nation Association of Steel Framed Housing Steel Framed Construction
	in Bushfire Areas 2021
NCC	National Construction Code
OPA	Outer Protection Area
PBP	Planning for Bush Fire protection 2019
RF Act	Rural Fires Act 1997
RF Reg	Rural Fires Regulation 2013
NSW RFS	NSW Rural Fire Service
SEPP	State Environmental Planning Policy
SFPP	Special Fire protection Purpose
SFR	Short fire run

<u>Asset Protection Zone:</u> A fuel reduced area surrounding a built asset or structure which provides a buffer zone between a bush fire hazard and an asset. The APZ includes a defendable space within which firefighting operations can be carried out. The size of the required APZ varies with slope, vegetation and FFDI.

<u>Bush Fire Attack level (BAL)</u>: A means of measuring the severity of a building's potential exposure to ember attack, radiant heat and direct flame contact. IN the NCC, the BAL is used as the basis for establishing the requirements for construction to improve protection of building elements.

<u>Bush fire:</u> An unplanned fire burning in vegetation, also referred to as wildfire.

Bush fire prone land (BFPL): An area of land that can support a bush fire or is likely to be subject to bush fire attack, as designated on a bush fire prone land map.

<u>Bush fire prone land map:</u> A map prepared in accordance with the NSW RFS requirements and certified by the Commissioner of the NSW RFS under EP&A Act s.10.3(2).

<u>Bush fire protection measures (BPMs):</u> A range of measures used to minimise the risk from a bushfire that need to be complied with. BPM's include APZ's, construction provisions, suitable access, water and utility services, emergency management and landscaping.

<u>Bush fire safety authority (BFSA):</u> An approval by the commissioner of the NSW RFS that is required for a subdivision for residential or rural residential purpose or for a SFPP development listed under section 100B of the RF Act.

<u>Consent authority:</u> As identified in the EP&A Act, in relation to development consents, usually the local council.

<u>Defendable space:</u> An area adjoining a building that is managed to reduce combustible elements free from constructed impediments. It is a safe working environment in which efforts can be undertaken to defend the structure, before and after the passage of a bush fire.

<u>Effective slope:</u> The land beneath the vegetation which most significantly effects fire behaviour, having regard to the vegetation present.

<u>Fire Danger Index (FDI)</u>: The chance of a fire starting, its rate of spread, its intensity and the difficulty potential for its suppression, according to various combinations of air temperature, relative humidity, wind speed and both the long- and short-term drought effects.

<u>Inner protection Area (IPA):</u> The component of a APZ which is closest to the asset (measured form unmanaged vegetation). It consists of an area maintained to minimal fuel loads so that a fire path is not created between the hazard and the building.

<u>Managed land:</u> Land that has vegetation removed or maintained to a level that limits the spread and impact of bush fire. This may include developed land (residential, commercial or industrial), roads, golf course fairways, playgrounds, sports fields, vineyards, orchards, cultivated ornamental gardens and commercial nurseries. Most common will be gardens and lawns within curtilage of buildings. These areas are managed to meet the requirements of an APZ.

<u>Outer Protection Area (OPA):</u> The outer component of an APZ, where fuel loads are maintained at a level where the intensity of an approaching bush fire would be significantly reduced. Applies to Forest vegetation only.

<u>Special Fire Protection Purpose (SFPP) developments:</u> Developments where the vulnerable nature of the occupants means that a lower radiant heat threshold needs to be accommodated for in order to allow for the evacuation of occupants and emergency services.

<u>Vegetation classification:</u> Vegetation types identified using the formations and classifications within *Ocean Shores to Desert Dunes: The Native Vegetation of New South Wales and ACT (Keith, 2004).*