

27 September 2019

NSW Rural Fire Service  
Headquarters  
Locked Bag 17  
Granville NSW 2142  
Attn: Garth Bladwell

Dear Garth,

**RE: Request to review RFS Bush Fire Safety Authority – Peninsula Gardens**

The purpose of this letter is to request a review of the NSW Rural Fire Service (RFS) Bush Fire Safety Authority dated 23<sup>rd</sup> October 2018 (RFS Ref: D18/926) regarding the application for an addition to the Peninsula Gardens retirement village at 79 Cabbage Tree Road, Bayview.

The request is to specifically review the Asset Protection Zone (APZ) requirement listed at the third paragraph of Point (1) of the letter as follows:

*“A 30 m APZ shall be provided to the riparian zone and shall be maintained as an Inner Protection Area (IPA).”*

The Bushfire Assessment Report prepared by Peterson Bushfire (14 February 2018) and submitted with the DA presented the argument that the riparian zone did not require a specific APZ distance as per Table A2.6 of 'Planning for Bush Fire Protection 2006' (PBP). Therefore, only a defensible space was proposed.

The development proposal has since been altered by deleting units at the western end of the development increasing the separation to the riparian zone. The proposed approach to providing bushfire protection from the riparian zone remains to be one of defensible space rather than a specific APZ distance stipulated by PBP Table A2.6 for the following reasons:

1. The riparian zone is only 20 m wide and sits within the 60 m APZ between the proposed buildings on the northern side of the drainage line and the existing buildings on the southern side of the drainage line. The riparian corridor will sit amongst a managed environment.
2. The fuel load within the riparian zone consists of Coachwood Warm Temperate Rainforest only, which extends to the west beyond the 60 m APZ.
3. The 'Acceptable Solutions' for determining APZ distance listed in Table A2.6 of PBP do not cater for such narrow and low risk hazards as described in Points 1 and 2 above. The vegetation classification of 'low hazard' is overly conservative for the risk attributes of the corridor and therefore not an accurate classification.
4. The proposed defensible space will be managed to an Inner Protection Area (IPA) standard (within the 60 m APZ) and will include access roads. At its narrowest point, the defensible space will be 20 m between the riparian corridor and ILU 15/16 and 24 m to ILU 8. ILU 15 at 16 m separation will be amended to ensure a minimum 20 m defensible space.

The location of the riparian corridor and proposed APZ/defensible space is shown on the attached.

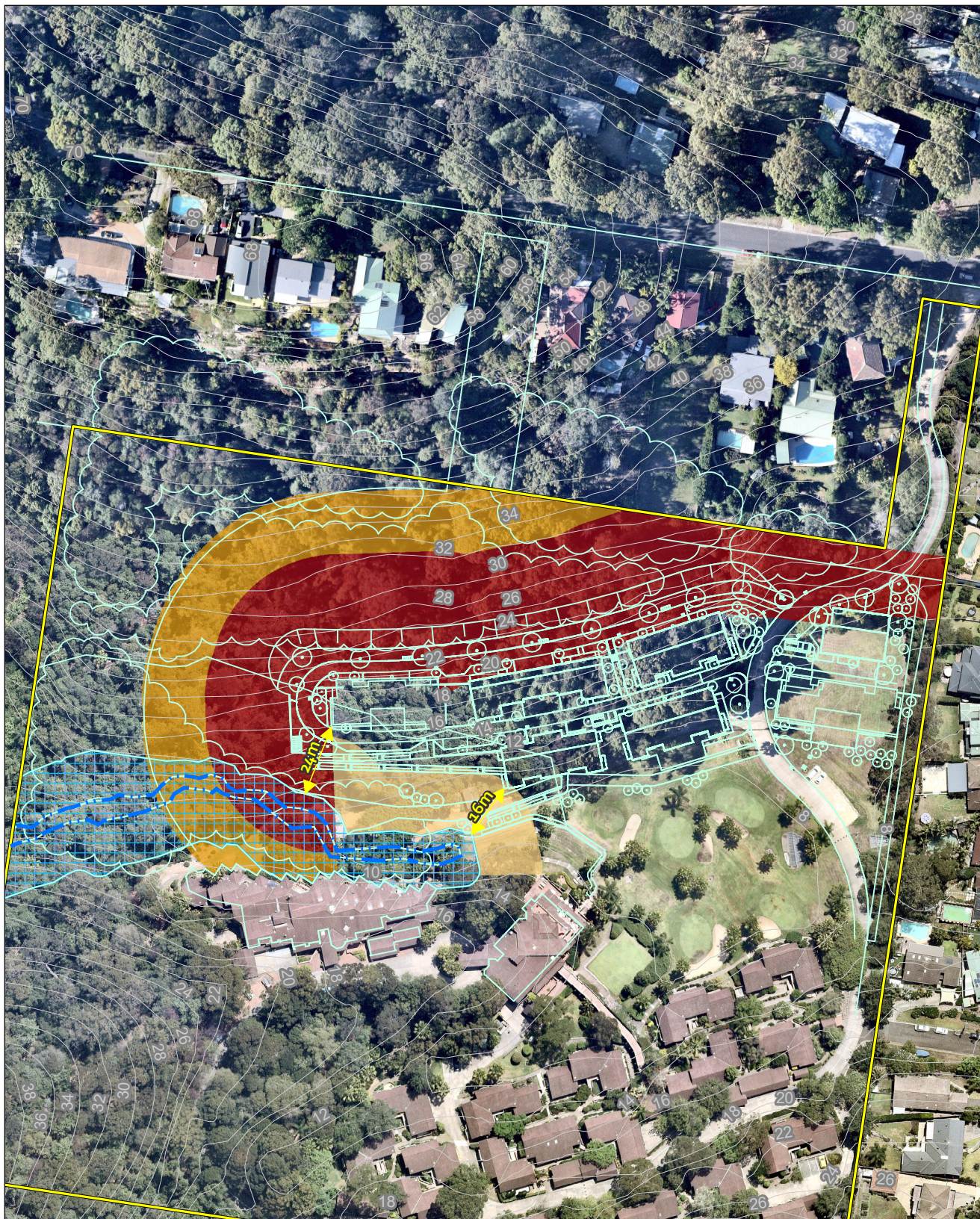
It is requested that RFS review Point 1 of the Bush Fire Safety Authority to remove the requirement for the 30 m APZ to the riparian corridor and replace it with the requirement for a minimum 20 m defensible space.

Please don't hesitate to contact Peterson Bushfire using the number below should you seek further clarification on the above matter.









Yours sincerely,

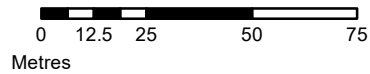


David Peterson



**Legend**

-  Top of Bank
-  Site Plan
-  Contour - 2m
-  Subject Land
-  Riparian Zone
- Asset Protection Zone - 20m**
-  IPA - 20m
- Asset Protection Zone - 60m**
-  IPA - 40m
-  OPA - 20m



Coordinate System: GDA 1994 MGA Zone 56

Imagery: © Nearmap

**Figure 1: Revised Asset Protection Zone (APZ)**