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**Sent:** 6/02/2021 12:53:07 PM  
**Subject:** DA 2020/1489

Submission on conformity within DA 2020/1489 with the requirement laid down in relevant parts of Planning for Bushfire Protection 2019.

I submit that the documents accompanying the application on this subject are inadequate. There is a lack of such detail as would allow a reasonably competent assessment to conclude that it fully meets the requirement that I list hereunder.

Applicable provisions of PFBP 2019 at p.44

- 5.1.1 “Sub- division for the creation of isolated developments, particularly in rugged, heavily timbered country, poses significant challenges from a planning and/or bushfire risk perspective. Additional considerations for isolated sub-divisions are provided in this section.
- Access and egress within the developable land and along the adjoining public road system shall include safety provisions for attending emergency vehicles and evacuating residents, including road widths and management of vegetation along road verges. Clearing or modifying vegetation in roadside verges may not be permitted.
- Sub-divisions of three or more allotments have more than one access in and out of the development; traffic management devices are constructed to not prohibit access by emergency vehicles; maximum grades for sealed roads not to exceed 15 degrees or other gradient specified by road design standards, whichever is the lesser gradient; all roads are through roads”.

*I submit that none of this vital information accompanies the application and for this reason such application should not on these specific grounds be supported.*

*The application documents reference statement relying on the short distance to the Ingleside RFS Station is delusory and the more so when the acknowledged and proven gridlocks that occur daily on Forest Rd and Jubilee Rd intersections with Ponderosa Rd are taken into account, for which there are verified accounts of extended traffic delays often exceeding 30 mins in peak hours morning and afternoon gridlock.*

*I further submit that it is a clear requirement that there must be “more than one access in and out of the development”. The application does not include any information as to how access onto Forest Rd is to be achieved in the face of a continuing refusal by 4 Forest Rd to concede right of way. Nor is there any discussion in the document as to whether the recommended 8 m wide access rd will meet the other requirements for emergency fire fighting vehicles to be able to access the site simultaneously with escaping resident vehicles. As to the proposed use of the existing bridge over Narrabeen Creek, said to be capable of simultaneous use by fire vehicles, service vehicles and residents cars it is to be noted that such concrete bridge is claimed by the Body Corporate of 6 Forest to have been built by them as a condition of consent for their development and still under the ownership thereof. This vital pre-condition is not dealt with at all in the application documents.*

*And in any case @ p.45 PBFP 2019 (“Capacity of perimeter and non-perimeter road surfaces and any bridges/causeways is sufficient to carry fully loaded fire fighting vehicles*

up to 23 tonnes. Bridges/causeways are to clearly indicate load ratings”).

*I submit the application documents fail to establish in detail how access onto Forest Rd is to be achieved, given refusal of No 4 Forest, nor is such refusal persists as seems likely, just how it would be proposed to be constructed and whether such could fully satisfy the PBFB requirements listed above. The submitted application should therefore be refused.*

*Signed David James*

*3 Bolwarra Rd*

*North Narrabeen. 6 Feb, 2021*