



Building Code & Bushfire Hazard Solutions

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McNally Architects
201/8 Clarke Street,
Crows Nest, NSW 2065

18th December 2024
Our Ref. 250564

Attention: Dariane Tenorio

Re: **PROPOSED ALTERATIONS AND ADDITIONS TO RSLLC MONTGOMERY THEATRE
ANZAC VILLAGE – EDMONDSON DRIVE, NARRABEEN
BUSHFIRE ASSESSMENT STATEMENT**

Dear Dariane,

The subject site is within a retirement village known as RSLLC Montgomery Theatre, Anzac Village and located at Edmondson Drive, Narrabeen.

The proposed works include:

- Demolition of a brick cottage, bus shelter and bus port to the south of the theatre.
- Demolition of retaining walls and decking to the west of the theatre.
- Landscaping

There will be no increase in resident numbers to the village as a result of the proposed works.

The subject site has street frontage to Edmondson Drive to the south and Endeavour Drive to the west, abuts Anzac Village community buildings to the north, east and west beyond Endeavour Drive, a residential area of the village beyond Endeavour Drive and Edmondson Drive to the south and a vegetated allotment beyond the buildings to the west.

Properties considered to be affected by possible bushfire impact are determined from local Bushfire Prone Land Map's as prepared by Council and or the Rural Fire Service. All property development within affected areas is subject to the conditions detailed in the document 'Planning for Bush Fire Protection - 2019' (PBP).

In this instance the subject site is depicted on Northern Beaches Council's Bushfire Prone Land Map (BPLM) as containing Vegetation Category 1 and the Vegetation Buffer and is therefore considered 'bushfire prone' land.

Retirement villages are a listed Special Fire Protection Purpose (SFPP) under section 100b (a) of the *Rural Fires Act 1997*.

SFPP development is one which is occupied by people who are considered to be at-risk members of the community. In a bushfire event, these occupants may be more susceptible to the impacts of bushfire.

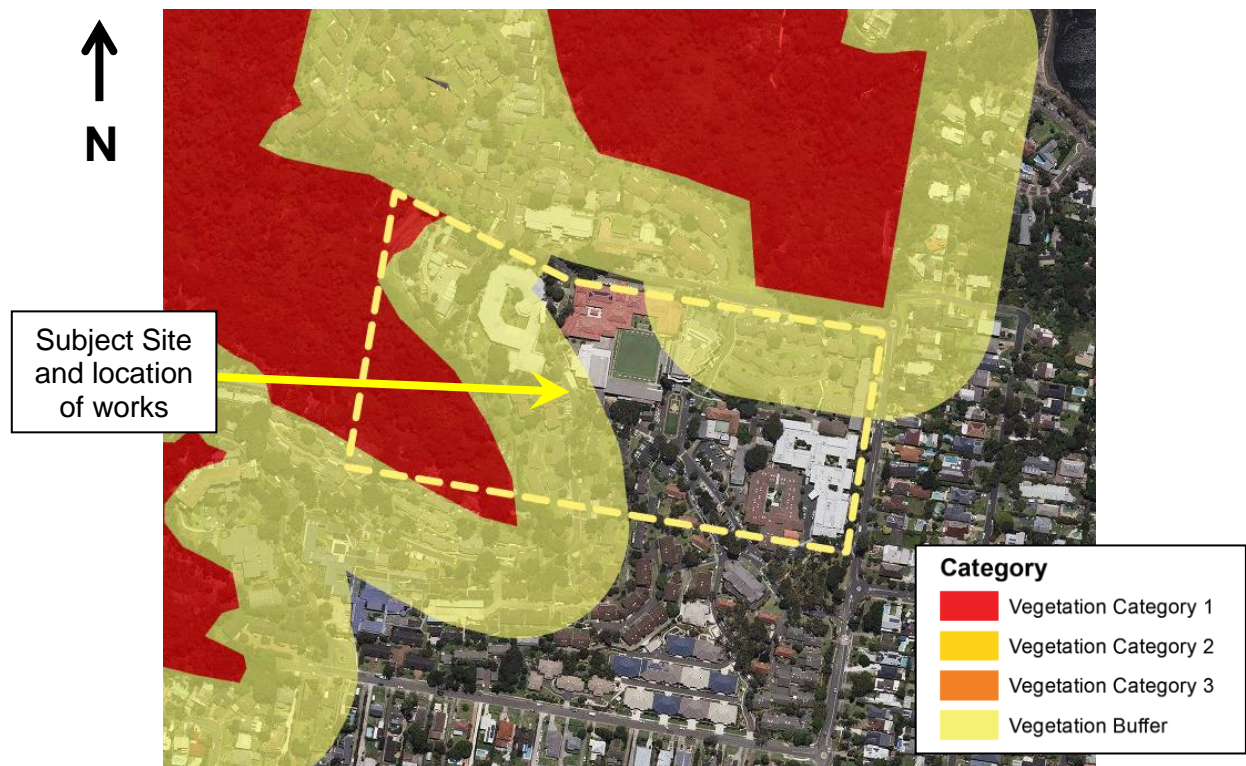


Figure 01: Extract from Northern Beaches Council's Bushfire Prone Land Map

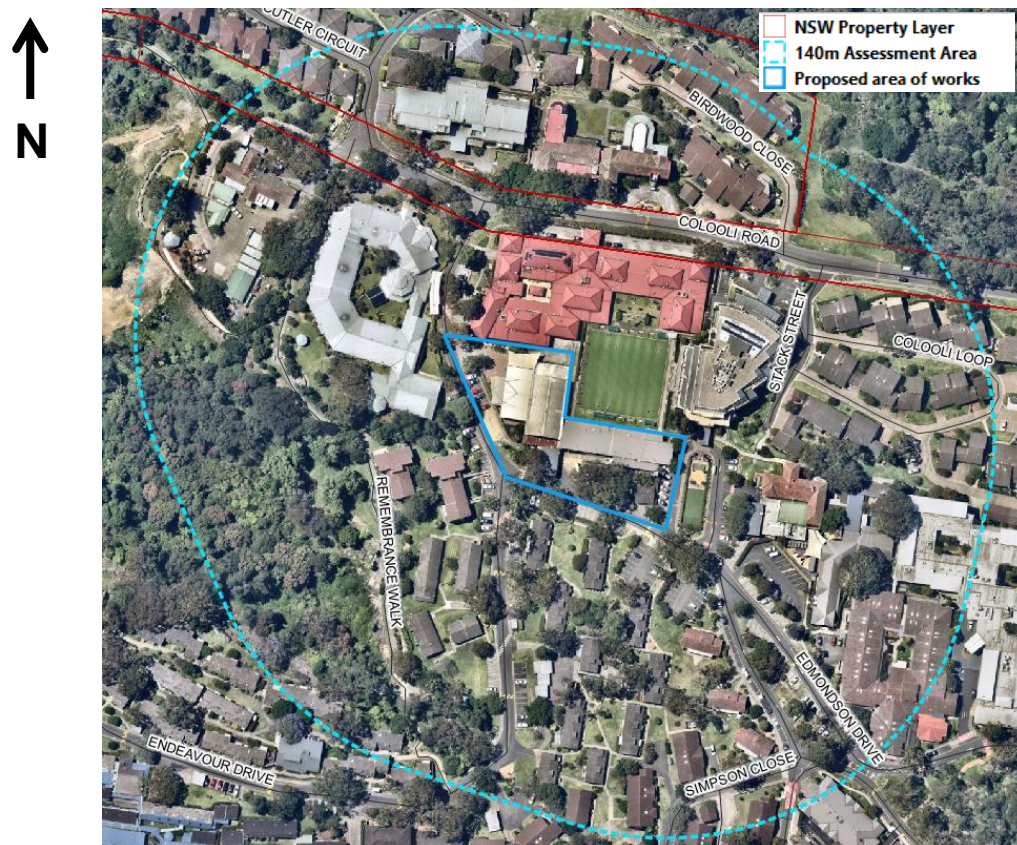


Figure 02: Aerial view of the subject area – C/- Nearmaps (February 2024)

Section 46 of the *Rural Fires Regulation 2022* outlines development excluded from requirements for a Bush Fire Safety Authority under section 100b of the *Rural Fires Act 1997*. These include:

- (j) construction or installation of a flagpole, aerial, antenna or satellite dish,
- (k) construction or installation of a driveway, pathway or other paved area,
- (l) the carrying out of earthworks or drainage works,
- (m) construction of a class 10a building that is at least 6 metres from a dwelling,
- (n) minor external non-structural building alterations carried out in accordance with *Planning for Bush Fire Protection*,
- (o) development of a minor nature that relates to an existing building that is for a special fire protection purpose.

Where reference has been made to the surrounding lands, this statement does not purport to directly assess those lands; rather it may discuss bushfire impact and/or progression through those lands and possible bushfire impact to the subject property.

To accord with PBP the development is classified as Special Fire Protection Purpose development and assessed under section 6.4 'Development of existing SFPP facilities' of PBP.

Plans by McNally Architects (Demolition Plan, project number 23010, dated 3/12/2024) and Group GSA Pty Ltd (Landscape Plan, project no: 241917, dated 28/10/2024) have been referenced in the preparation of this assessment.

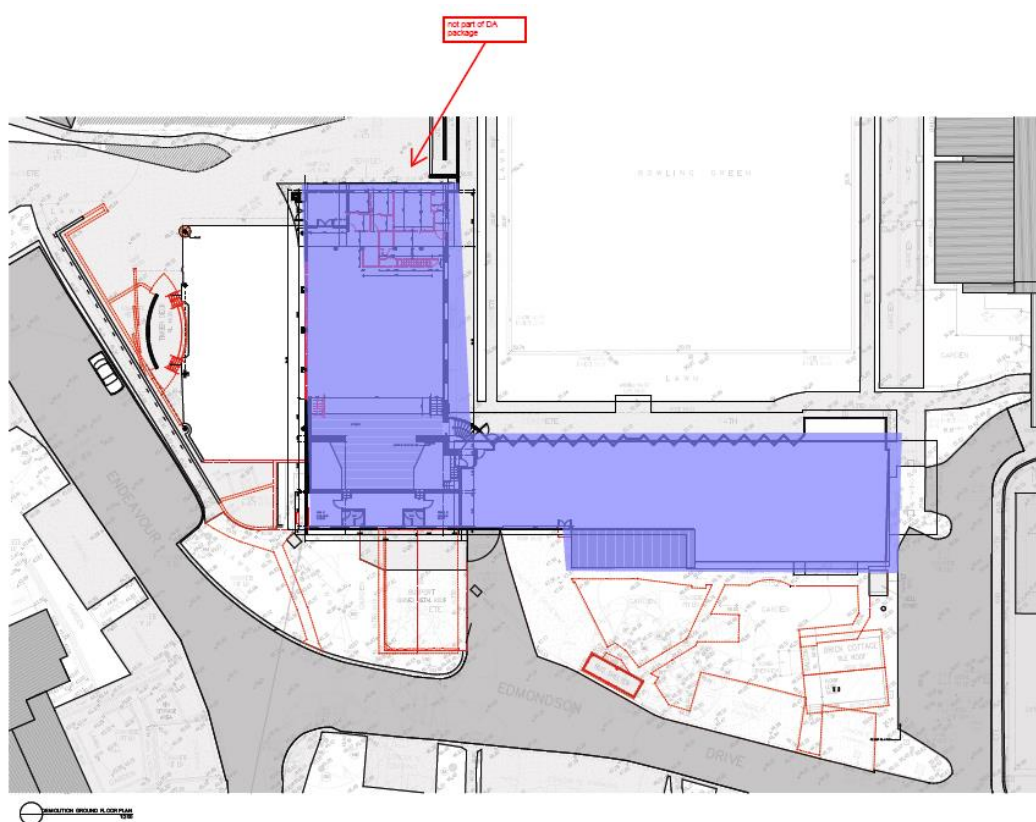


Figure 03: Extract from McNally Architects Plan showing demolition works



Figure 04: Extract from the Group GSA Plan showing proposed works

Section 6.5 of PBP addresses minor development in SFPP facilities and lists development types which do not have any influence on potential bush fire impacts and the bush fire protection of the building:

6.5 Minor development in SFPP facilities

Minor development includes the following:

- *Internal works;*
- *Flag poles;*
- *Aerials and antennas;*
- *Satellite dishes;*
- *Paved areas;*
- *Earth works and draining;*
- *Class 10a structures located further than 6m from a habitable building; and*
- *Minor non-structural building alterations (external) such as the following:*
 - *painting, plastering, cement rendering,*
 - *cladding, attaching fittings or decorative work;*
 - *the replacement of an external window, glazing areas or a door (however, the opening and/ or external glazed area of the window or door must not be increased in size);*
 - *the repair to or replacement of a non-structural wall or roof cladding;*
 - *the installation of a security screen or grill to a door or window or a security door;*
 - *the repair to or replacement of a balustrade; and*
 - *re-stumping or repairing structure foundations without increasing the height of the structure.*

The development types listed above do not have any influence on potential bush fire impacts and the bush fire protection of the building. For this reason, the NSW RFS does not consider that a BFSA is necessary for the development types listed above. Wherever applicable, the building elements concerned will need to comply with the requirements of AS 3959 or NASH Standard under the NCC.

In considering the above all works are captured as 'minor development' except for the landscaping.

The landscaping has been designed and managed to minimise flame contact and radiant heat to buildings, and the potential for wind-driven embers to cause ignitions, satisfying the Performance Criteria for Landscaping under Table 6.8a of PBP.

It is noted that there is no new building construction proposed.

PBP – Development of existing SFPP facilities:

The proposal relates to an existing Special Fire Protection Purpose development (approved prior to August 2002) and therefore the application can be assessed under the provisions of section 6.4 'Development of existing SFPP facilities' of PBP.

The objectives that apply to existing SFPP development and our comments are listed in the table below:

Objective	Comment
<i>provide an appropriate defensible space;</i>	<p>The proposal does not restrict the existing defensible space and provides a greater defensible space for the existing retained buildings.</p> <p>The Asset Protection Zone consists of maintained land within the subject property, playing fields, car parks and neighbouring allotments.</p> <p>An appropriate defensible space is provided.</p>
<i>site the building in a location which ensures appropriate separation from the hazard to minimise potential for material ignition;</i>	<p>There are no proposed buildings as part of this application.</p>
<i>provide a better bush fire protection outcome for existing buildings;</i>	<p>The proposed works in our opinion will enhance the existing bushfire protections measures (defensible space) within the subject site.</p> <p>The landscaping has been designed and managed to minimise flame contact and radiant heat to buildings, and the potential for wind-driven embers to cause ignitions, satisfying the Performance Criteria for Landscaping under Table 6.8a of PBP.</p> <p>In consideration of the scope of works proposed it is not considered reasonable to apply measures to the existing buildings.</p>

Objective	Comment
<i>new buildings should be located as far from the hazard as possible and should not be extended towards or situated closer to the hazard than the existing buildings (unless they can comply with section 6.8);</i>	There are no new buildings proposed as part of this application.
<i>ensure there is no increase in bush fire management and maintenance responsibility on adjoining landowners without their written confirmation;</i>	The proposal does not result in any increased bushfire management or maintenance on adjoining landowners.
<i>ensure building design and construction enhances the chances of occupant and building survival; and</i>	No new buildings are proposed as part of this application.
<i>provide for safe emergency evacuation procedures including capacity of existing infrastructure (such as roads).</i>	<p>The proposal includes new pedestrian access to the proposed open area, enhancing occupant movement through the site.</p> <p>The existing road network provides an appropriate operational environment for emergency service personnel undertaking property protection or fire suppression activities.</p>

Recommendations

Landscaping

1. That all new landscaping is to comply with the Landscape Plan prepared by Group GSA Pty Ltd (Project no: 241917, dated 28/10/2024)

Conclusion:

The subject site is depicted on Northern Beaches Council's Bushfire Prone Land Map (BPLM) as vegetation Category 1 and the Vegetation Buffer and is therefore considered 'bushfire prone' land.

The subject site is within a retirement village known as RSLLC Montgomery Theatre, Anzac Village and located at Edmondson Drive, Narrabeen.

The proposed works include:

- Demolition of a brick cottage, bus shelter and bus port to the south of the theatre.
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- Landscaping

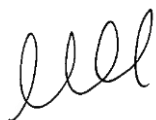
The proposed works, except for the landscaping are captured as minor development.

The landscaping has been designed and managed to minimise flame contact and radiant heat to buildings, and the potential for wind-driven embers to cause ignitions, satisfying the Performance Criteria for Landscaping under Table 6.8a of PBP.

We are therefore in support of the development application.

Should you have any questions please do not hesitate to contact the undersigned.

Prepared by
Building Code & Bushfire Hazard Solutions



Patrick Friend
Trainee Bushfire Consultant

Reviewed by
Building Code & Bushfire Hazard Solutions P/L



Stuart McMonnies
Director / Manager Bushfire Section
G. D. Design in Bushfire Prone Areas.
Certificate IV Fire Technology
FPA Australia BPAD Level 3 Accredited Practitioner
BPAD Accreditation No. BPAD9400



Quote from Planning for Bush Fire Protection 2019, 'While the material within this publication is current at the time of writing changes in circumstances after the time of publication may impact on the accuracy of the material. Individuals are responsible for ensuring they have the most current version of this publication.'

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Similarly the interpretations and opinions provided by Building Code and Bushfire Hazard Solutions in regard to bushfire design, protection and mitigation are also given in the same good faith.