

Bushfire Assessment Report

Proposed:
**Sole Occupancy
Dwelling**

At:
**152 Bantry Bay Road
Frenchs Forest**

Reference Number: 211437

Prepared For:
Fairmont Homes

15th June 2021



Prepared By:
**Building Code & Bushfire
Hazard Solutions Pty Limited**

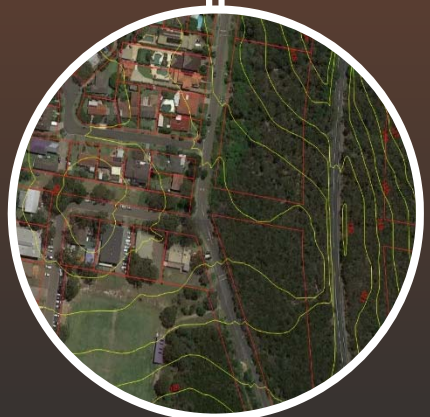
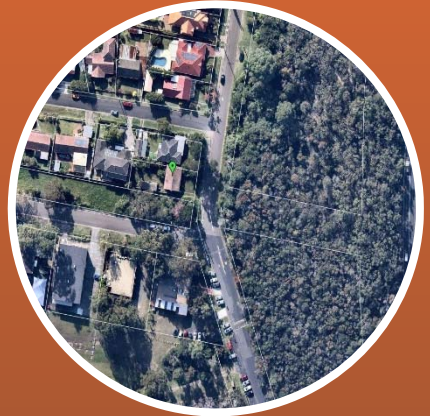
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**SILVER
MEMBER**
Fire Protection
Association Australia



Contents

	<u>Page No.</u>
Copyright and Disclaimer	2
List of Abbreviations	3
1.0 Introduction	4
2.0 Purpose of Report	4
3.0 Scope of Report	4
4.0 Compliance Table and Notes	5 - 6
5.0 Aerial view and Zoning	7
6.0 Site Assessment	8 - 12
7.0 Bushfire Protection Measures	13 - 17
8.0 Recommendations	18
9.0 Conclusion	19
10.0 Annexure	20
- List of referenced documents and attachments	
- Attachments	

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S4.14 applications (under the Environmental Planning and Assessment Act 1979) and all infill development applications may be referred by Council to the NSW Rural Fire Service for review and concurrence during the DA process. S100B applications under the Rural Fires Act 1997 (subdivisions and Special Fire Protection Purpose Developments), Flame Zone determinations and Alternate Solutions must be referred by Council to the NSW Rural Fire Service for review and receipt of a Bushfire Safety Authority (BSA) or other such recommended conditions from the NSW Rural Fire Service before the consent can be granted.

The onus is on the applicant to cross reference this document with any conditions of consent issued by Council or any requirements supplied by the NSW Rural Fire Service following development approval. BCBHS can review and cross reference these documents however the onus is on the applicant to provide them to us and request this review – Building Code and Bushfire Hazard Solutions Pty. Ltd. is not in a position to track every DA through Council and we rely upon the applicant to undertake this role as project co-ordinator.

Where any discrepancy between this document and the development approval or the NSW Rural Fire Service requirements is found, the conditions of consent always take precedence until such time as an application to review, amend or vary these conditions is approved.

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Version Control				
Version	Date	Author	Reviewed by	Details
1	15/06/2021	Duncan Armour	Stuart McMonnies BPAD Accreditation No. 9400	Final Report

List of Abbreviations:

APZ	Asset Protection Zone
AS3959	Australian Standard 3959 – 2018
BAL	Bushfire Attack Level
BPMs	Bushfire Protection Measures
BPLM	Bushfire Prone Land Map
Council	Northern Beaches Council
DA	Development Application
ELVIS	Elevation and Depth Foundation Spatial Data
EP&A Act	<i>Environmental Planning and Assessment Act - 1979</i>
ESD	Ecologically Sustainable Development
FRNSW	Fire and Rescue NSW
IPA	Inner Protection Area
NASH	National Association of Steel-framed Housing
NCC	National Construction Code
NP	National Park
NSP	Neighbourhood Safer Place
OPA	Outer Protection Area
PBP	<i>Planning for Bush Fire Protection – November 2019</i>
ROW	Right of Way
RF Act	<i>Rural Fires Act - 1997</i>
RFS	NSW Rural Fire Service
SEPP	State Environmental Planning Policy
SFPP	Special Fire Protection Purpose
SWS	Static Water Supply

1.0 Introduction

Building Code & Bushfire Hazard Solutions have been engaged to prepare a Bushfire Assessment Report for the proposed development at 152 Bantry Bay Road, Frenchs Forest.

The development proposal relates to the construction of a new sole occupancy dwelling within an existing residential allotment (R2: Low Density Residential). The subject site is located within Northern Beaches Council's local government area.

Properties considered to be affected by possible bushfire impact are determined from the local Bushfire Prone Land Map as prepared by Council and or the Rural Fire Service. Northern Beaches Council's Bushfire Prone Land Map identifies the subject property as containing the 100 metre buffer zone from Category 1 Vegetation.

To satisfy section 4.14 of the *Environmental Planning and Assessment Act 1979* the application must satisfy the relevant specifications and requirements of *Planning for Bush Fire Protection 2019* (PBP).

The development is classified as infill development and assessed under Chapter 7 'Residential Infill Development' of PBP.

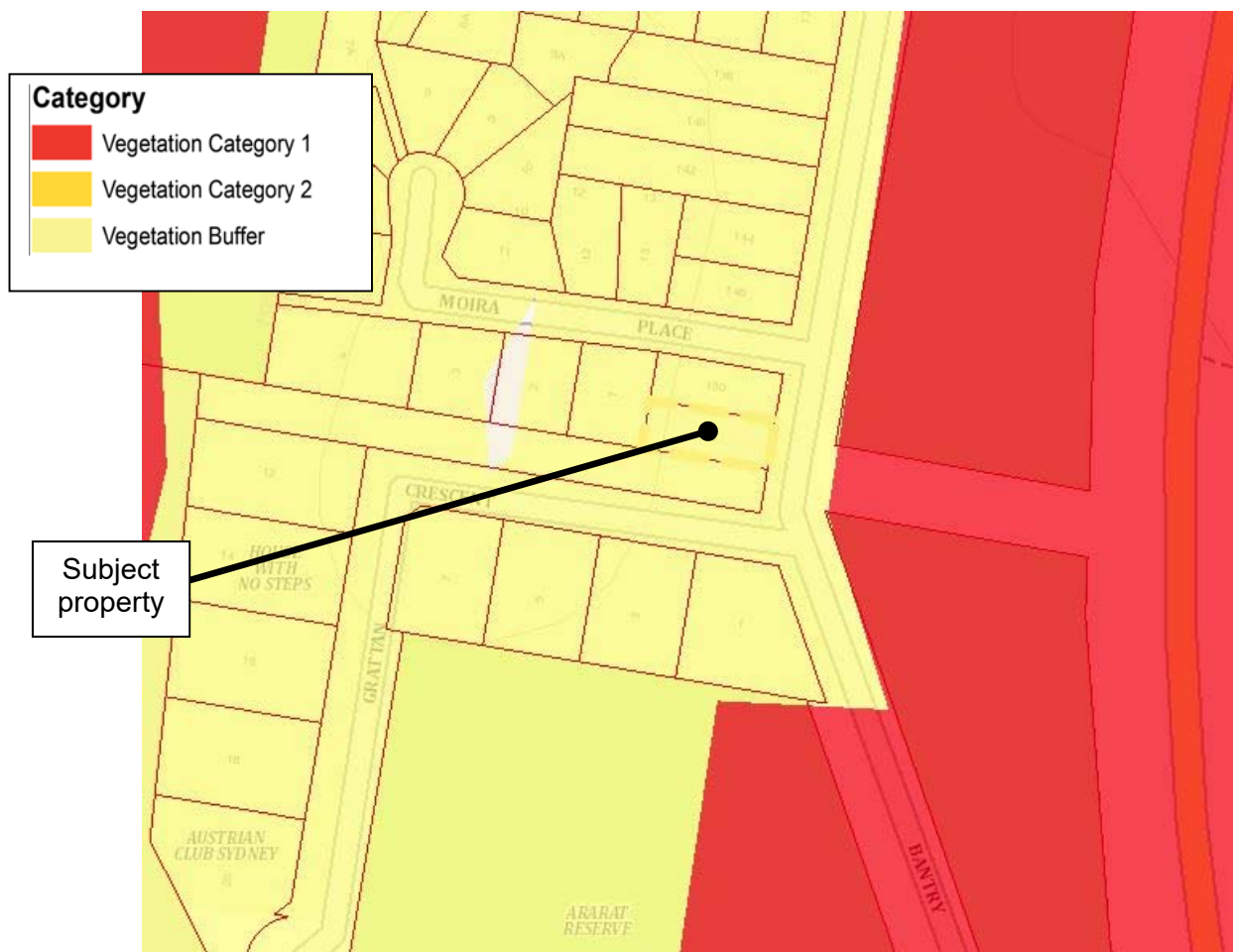


Figure 01: Extract from Northern Beaches Council's Bushfire Prone Land Map

2.0 Purpose of Report

The purpose of this Bushfire Assessment Report is to provide owner and Council with an independent bushfire assessment together with appropriate recommendations for both new building construction and bushfire mitigation measures considered necessary having regard to construction within a designated 'bushfire prone' area.

The recommendations contained within this report may assist in forming the basis of any specific construction conditions and/or bushfire mitigation measures that Council and/or the NSW Rural Fire Service may elect to place within any consent conditions issued for the subject Development Application.

3.0 Scope of this Report

The scope of this report is limited to providing a bushfire assessment and recommendations for the subject property. Where reference has been made to the surrounding lands, this report 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.

4.0 Compliance Tables & Notes

The following table sets out the projects compliance with *Planning for Bush Fire Protection – 2019*.

	North	East	South	West
Vegetation Structure	Maintained curtilages	Forest	Maintained curtilages	Maintained curtilages
Slope	N/A	0 - 5 degrees down	N/A	N/A
Asset Protection Zone	N/A	>29 metres	N/A	N/A
Significant Landscape Features	Neighbouring private properties	Bantry Bay Road / electrical easement	Road Reserve / Grattan Crescent	Neighbouring private properties
Threatened Species	APZ Existing	APZ Existing	APZ Existing	APZ Existing
Aboriginal Relics	APZ Existing	APZ Existing	APZ Existing	APZ Existing
Bushfire Attack Level	N/A	BAL 29	N/A	N/A
Required Construction Level	BAL 29	BAL 29	BAL 29	BAL 19

Compliance Summary of Bushfire Protection Measures			
Bushfire Protection Measure (s7.4 PBP)	Acceptable Solution	Performance Solution	Report Section
Asset Protection Zones	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7.03
Construction Standard	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7.03
Access	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7.03
Water Supply	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7.03
Gas and Electrical Supplies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	7.03

Asset Protection Zones

The available Asset Protection Zone was measured to be >30 metres to the east. The APZ consists of maintained grounds within the subject property and land equivalent to an APZ being Bantry Bay Road and the adjacent electrical easement.

Construction Level

The highest Bushfire Attack Level to the proposed dwelling was determined from Table A1.12.5 of PBP to be 'BAL 29'. The proposed dwelling is required to comply with section 3 and BAL 29 section 7 under AS 3959 – 2018 and the additional construction requirements under section 7.5 of PBP 2019. Any new works facing west can be downgraded to BAL 19 due to shielding provided by the dwelling itself.

Access and Services

Guideline Ref.	Proposed Development Determinations
Property Access (Driveway)	The most distant external point of the subject dwelling will be within 70 metres of a public road supporting a hydrant network and therefore the Access requirements detailed in Table 7.4a of PBP are <u>not</u> applicable.
Water Supply	The most distant external point of the building footprint will be within 70 metres from a public road supporting a hydrant network and therefore a Static Water Supply is <u>not</u> required under Chapter 7 of PBP.
Evacuation	Evacuation is possible by utilising existing road infrastructure. It is encouraged that the occupants complete a Bush Fire Survival Plan.
Electrical Supply	Existing supply to be provided.
Gas Supply	New connections must comply with Table 7.4a of PBP 19.

5.0 Aerial view and Zoning



Figure 02: Aerial view of the subject area C/- Nearmap

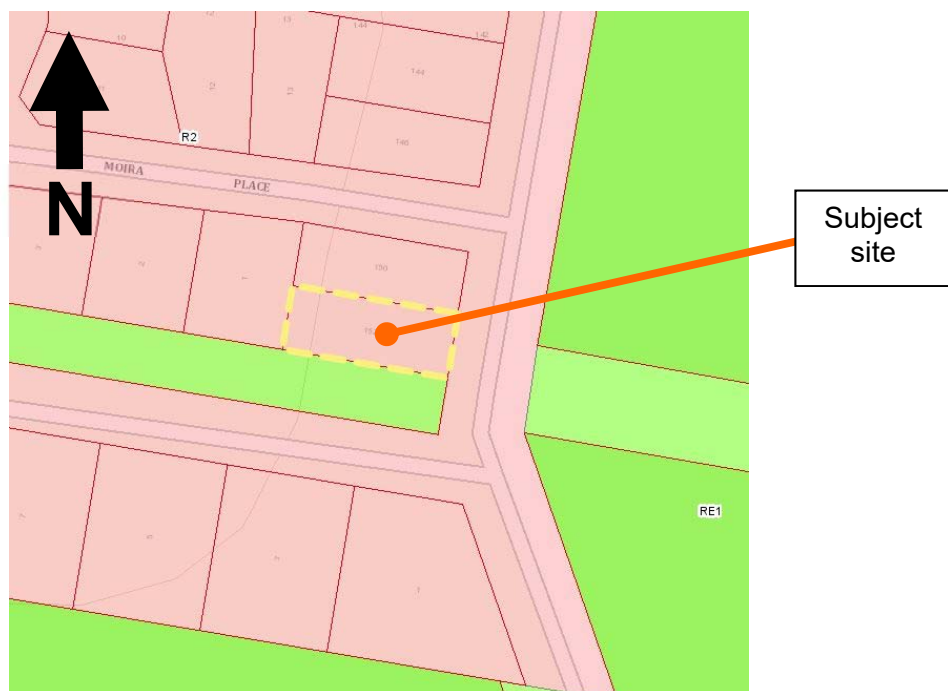


Figure 03: Zoning of subject area (C/- NSW Planning Portal)

6.0 Site Assessment

6.01 Location

The subject property is known as 152 Bantry Bay Road, Frenchs Forest (Lot 5 DP 28391) and is a residential allotment (R2: Low Density Residential) located within Northern Beaches Councils local government area.

The subject property has a street frontage to Bantry Bay Road to the east, abuts private residential allotments to the north and west and a road reserve followed by Grattan Crescent to the south.

The vegetation identified as being the hazard is located within a vegetated Council reserve to the east of the subject property.



Existing dwelling to be demolished

Photograph 01: View west from Bantry Bay Road toward the subject property



Location of the subject property

Figure 04: Extract from street-directory.com.au

6.02 Vegetation

In accordance with Appendix 1 'Site Assessment Methodology' of PBP we have undertaken an assessment of all vegetation formations within 140 metres of the development site for each aspect as per Keith (2004).

The subject property and neighbouring private residential allotments were found to consist of maintained lawns and gardens. The eastern end of the adjacent reserve to the south was found to consist of weeds and exotics and is not mapped as being bushfire prone land. A non-combustible fence has been recommended along this boundary as a mitigation measure.

The vegetation identified as being the hazard is located within a vegetated Council reserve to the east of the subject property. The vegetation posing a hazard was found to consist of trees 5 – 15 metres in height with a canopy cover of 30 - 70% with an understorey of low trees, shrubs and exotics.

For the purpose of assessment under 'Planning for Bush Fire Protection' the vegetation posing a hazard to the east of the proposed dwelling has been determined to be Forest.



Forest

Photograph 02: View within the vegetated Council reserve to the east



Forest

Photograph 03: View north along Bantry Bay Road in front of the subject property



Photograph 04: View south along Bantry Bay Road in front of the subject property



Photograph 05: View west along the boundary with the reserve to the south



Photograph 06: View east along the reserve to the south of the property

6.03 Slope and Topography

The slope of the land under the classified vegetation has a direct influence on the forward rate of spread, fire intensity and radiant heat exposure. The effective slope is considered to be the slope under the classified vegetation which will most significantly influence bushfire behaviour toward the development site.

The slope that would most significantly influence bushfire behaviour was determined from topographic imagery (1 metre contours sourced from ELVIS - Geoscience Australia) in conjunction with site observations.

The slope that would **most significantly** influence bushfire impact was determined onsite using an inclinometer and verified from topographic imagery to be:

- 0 - 5 degrees down slope within the hazard to the east

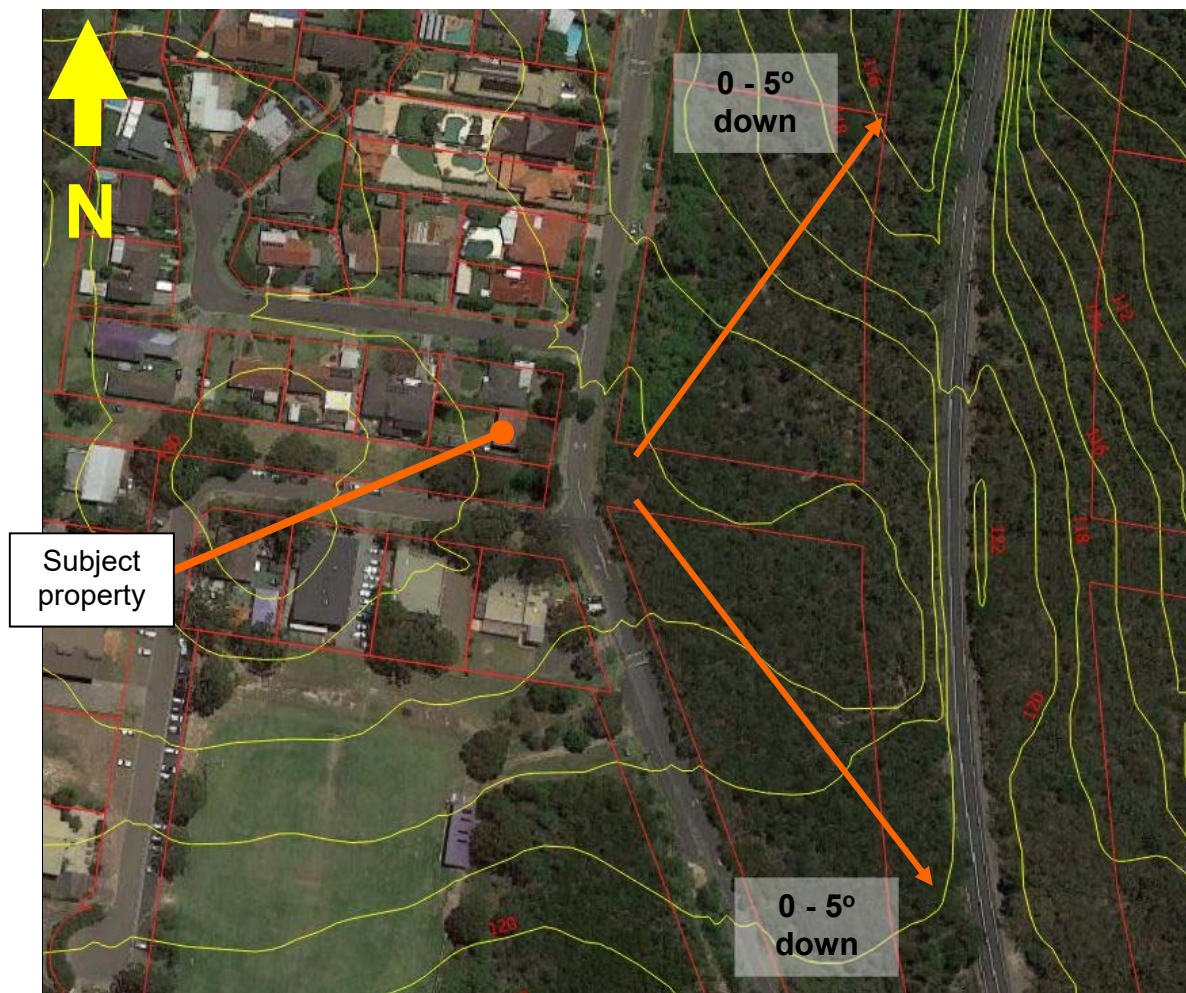


Figure 05: Extract from ELVIS – Geoscience Australia (2m Contours)

6.04 Fire Weather

All development which attracts an Asset Protection Zone under PBP requires the identification of the relevant Forest Fire Danger Index (FFDI). The FFDI required to be used for development assessment purposes is based on the local government boundaries, being Northern Beaches Council in this instance.

In accordance with the NSW Rural Fire Service publication 'NSW Local Government Areas FDI' (2017) Northern Beaches Council forms part of the Greater Sydney Region Fire Weather District and attracts an FFDI of 100.

7.0 Bushfire Protection Measures

7.01 Planning for Bush Fire Protection - 2019

Properties considered to be affected by possible bushfire impact are determined from the local Bushfire Prone Land Map as prepared by Council and or the Rural Fire Service.

In this instance the subject site is depicted on Northern Beaches Council's Bushfire Prone Land Map as containing the 100 metre buffer zone from Category 1 Vegetation and is therefore considered 'bushfire prone'.

As the subject allotment is mapped as Bushfire Prone Land it requires assessment under section 4.14 of the *Environmental Planning and Assessment Act 1979*.

To satisfy section 4.14 of the *Environmental Planning and Assessment Act 1979* the application must satisfy the relevant specifications and requirements of *Planning for Bush Fire Protection 2019* (PBP).

In accordance with PBP the proposal must satisfy the aim and objectives detailed in Chapter 1 'Introduction' and the specific objectives and bushfire protection measures detailed in Chapter 7 'Residential Infill Development'.

7.02 Specific Objectives

The following table lists the specific objectives for Residential Infill development in accordance with section 7.3 of PBP and our comments on compliance or otherwise.

Specific Objective	Comment
<i>provide a defensible space to enable unimpeded access for firefighting around the building;</i>	The subject site abuts Bantry Bay Road to the east, providing a logical fire-fighting platform and defensible space.
<i>provide better bush fire outcomes on a redevelopment site than currently exists, commensurate with the scale of works proposed;</i>	<p>The proposed dwelling will be constructed to BAL 29 and BAL 19 being the relevant Bushfire Attack Levels.</p> <p>The proposed dwelling replaces an existing dwelling which has no bushfire protection measures.</p>
<i>design and construct buildings commensurate with the bush fire risk;</i>	The proposed dwelling will be constructed to BAL 29 and BAL 19 being the relevant Bushfire Attack Levels.

Specific Objective	Comment
<i>provide access, services and landscaping to aid firefighting operations;</i>	All grounds within the subject site will be maintained in accordance with an Asset Protection Zone / Inner Protection Area as detailed in Appendix 4 of Planning for Bush Fire Protection 2019 and the NSW Rural Fire Service publication 'Standards for Asset Protection Zones'.
<i>not impose an increased bush fire management and maintenance responsibility on adjoining land owners; and</i>	The proposal will not result in any increased bushfire management and or maintenance responsibilities on adjoining land owners.
<i>increase the level of bush fire protection to existing dwellings based on the scale of the proposed work and level of bush fire risk.</i>	The new building works will enhance the protection to the occupants.

7.03 Bushfire Protection Measures

Section 7.4 'Bush fire protection measures' of PBP outlines the specific Bushfire Protection Measures (BPMs) applicable to residential infill development, including APZs, Access, Services, Construction, Landscaping & Emergency Management Plan.

The following section addresses each BMP and compliance or otherwise.

Asset Protection Zones

The subject property is a residential allotment located in an area of similar properties. The vegetation identified as being the hazard is located within a vegetated Council reserve to the east of the subject property.

The available Asset Protection Zone was measured to be >30 metres to the east. The APZ consists of maintained grounds within the subject property and land equivalent to an APZ being the formed area of Bantry Bay Road.

All grounds within the subject property are to be maintained in accordance with an Inner Protection Area (IPA) as detailed in the NSW Rural Fire Service's document 'Standards for Asset Protection Zones'.

Access

The subject property has street frontage to Bantry Bay Road to the east. Persons seeking to egress from the subject property are able to do so via the proposed access drive and existing public road infrastructure.

The most distant external point of the proposed footprint is less than 70 metres from a public road supporting the operational use of fire fighting vehicles and therefore the Access requirements detailed in Table 7.4a of PBP are not applicable.

Access to the hazard is available via the Bantry Bay Road and Wakehurst Parkway for hazard reduction for fire suppression activities.

The existing access is considered adequate for this development.

Water Supply

Hydrants are available throughout Bantry Bay Road and surrounding streets for the replenishment of fire service vehicles. The most distant external point of the subject dwelling is within 70 metres of a public road that supporting a hydrant network and therefore a Static Water Supply is not required.

The existing water supply is considered adequate for this development.

Services – Electricity & Gas

Recommendations will be included to ensure compliance with gas services requirements detailed in Table 7.4a of PBP for the dwelling as necessary.

The proposed dwelling will be connected to the existing electrical network.

Construction

The objectives of Planning for Bush Fire Protection – 2019 are for the protection of life including fire fighters. Provided these objectives can be met the construction of buildings is feasible and both the Rural Fire Service and Council should be in a position to consider such applications.

The highest Bushfire Attack Level to the proposed works was determined from Table A1.12.5 of PBP to be 'BAL 29'. The proposed works is required to comply with section 3 and BAL 29 section 7 under AS 3959 – 2018 and the additional construction requirements under section 7.5 of PBP 2019.

Any new works facing west can be downgraded to BAL 19 due to shielding provided by the dwelling itself.

To mitigate impact from an unlikely fire in the road reserve a non-combustible fence has been recommended along the southern boundary.

Landscaping

Any new landscaping within the residential allotments must comply with Section 3.7 'Landscaping' of *Planning for Bush Fire Protection 2019*.

Emergency Management Plan

Evacuation is possible by utilising existing road infrastructure.

It is encouraged that the occupants of the dwelling complete a Bush Fire Survival Plan. The template for this plan is available at <https://www.rfs.nsw.gov.au/resources/bush-fire-survival-plan>.

7.08 Aim & Objectives of PBP

The following table details the aim and objectives of *Planning for Bush Fire Protection 2019* and the proposals ability to comply.

Aim / Objective	Comment
<p>The aim of PBP is to provide for the protection of human life and minimise impacts on property from the threat of bush fire, while having due regard to development potential, site characteristics and protection of the environment.</p>	<p>With the inclusion of the recommendations made herein it is of our opinion that the aim of PBP has been satisfied.</p>
<p>(i) afford buildings and their occupants protection from exposure to a bush fire;</p>	<p>The proposed works will be constructed to BAL 29 / BAL 19 under AS3959 – 2018, being the relevant Bushfire Attack Levels. This will afford buildings and their occupants protection from exposure to a bush fire</p> <p>A non-combustible fence has been recommended along the southern boundary.</p>
<p>(ii) provide for a defensible space to be located around buildings;</p>	<p>Bantry Bay Road is between the subject site and the hazard, providing a logical fire-fighting platform for fire fighters and defensible space.</p> <p>In consideration of the site circumstances suitable defensible spaces are provided.</p>
<p>(iii) provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings;</p>	<p>The proposed works being constructed to the relevant Bushfire Attack Level will minimise potential material ignition.</p>
<p>(iv) ensure that appropriate operational access and egress for emergency service personnel and occupants is available;</p>	<p>The most distant external point of the proposed footprint is less than 70 metres from a public road supporting the operational use of fire fighting vehicles.</p> <p>Access to the hazard is available via Bantry Bay Road or Wakehurst Parkway.</p>

Aim / Objective	Comment
(v) provide for ongoing management and maintenance of bush fire protection measures, (BPMs); and	<p>All grounds within the subject site will be maintained in accordance with an Inner Protection Area as detailed in Appendix 4 of Planning for Bush Fire Protection 2019 and the NSW Rural Fire Service publication 'Standards for Asset Protection Zones'.</p> <p>Any new landscaping is to comply with the provisions of Table 7.4a and Appendix 4 of PBP – 2019.</p>
(vi) ensure that utility services are adequate to meet the needs of firefighters.	<p>Hydrants are available throughout Bantry Bay Road and surrounding streets for the replenishment of fire service vehicles.</p> <p>The most distant external point of the subject dwelling is within 70 metres of a public road that supporting a hydrant network.</p>

It is therefore of our opinion that the proposal can satisfactorily comply with the aim and objectives of *Planning for Bush Fire Protection 2019*.

8.0 Recommendations

The following recommendations are provided as the minimum necessary for compliance with Planning for Bush Fire Protection – 2019 and Australian Standard 3959 'Construction of buildings in bushfire-prone areas - 2018. Additional recommendations are provided to supplement these minimum requirements where considered necessary.

Asset Protection Zones

1. That all grounds within the subject property are to be maintained as an Asset Protection Zone (Inner Protection Area) as detailed in the NSW Rural Fire Service's document 'Standards for Asset Protection Zones' and Appendix 4 of *Planning for Bush Fire Protection 2019*.

Construction

2. That all roofing and all works facing north, south and east shall comply with Australian Standard AS3959-2018 "Construction of buildings in bush fire-prone areas" Sections 3 & 7 (BAL 29) and Section 7.5 of *Planning for Bushfire Protection 2019*.
3. That all new works facing west shall comply with Australian Standard AS3959-2018 "Construction of buildings in bush fire-prone areas" Sections 3 & 6 (BAL 19) and Section 7.5 of *Planning for Bushfire Protection 2019*.
4. That a 1.8 metre high non-combustible fence is constructed along the southern boundary.

Landscaping

5. That any new landscaping is to comply with Section 3.7 'Landscaping' under *Planning for Bush Fire Protection 2019*.

Emergency management

6. That the occupants of the subject dwelling complete a Bush Fire Survival Plan.

Gas (where applicable)

7. That any new gas services are to comply with Table 7.4a of Planning for Bush Fire Protection 2019 as follows:
 - reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used;
 - all fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side;
 - connections to and from gas cylinders are metal;
 - polymer-sheathed flexible gas supply lines are not used; and
 - above-ground gas service pipes are metal, including and up to any outlets.

9.0 Conclusion

Given that the property is deemed bushfire prone under Northern Beaches Council's Bushfire Prone Land Map any development would need to meet the requirements of Planning for Bush Fire Protection – 2019 and of the construction requirements of AS3959 – 2018. The determination of any bushfire hazard must be made on a site-specific basis that includes an assessment of the local bushland area and its possible impact to the subject property.

The subject property is a residential allotment within an area of similar properties. The vegetation identified as being the hazard is located within a vegetated Council Reserve to the east of the subject property.

The highest Bushfire Attack Level to the proposed works was determined from Table A1.12.5 of PBP to be 'BAL 29'. The proposed works is required to comply with section 3 and BAL 29 section 7 under AS 3959 – 2018 and the additional construction requirements under section 7.5 of PBP. Any new works facing west can be downgraded to BAL 19 due to shielding provided by the dwelling itself.

The existing water supply and proposed access provisions are considered adequate for this development.

In accordance with the bushfire safety measures contained in this report, and consideration of the site specific bushfire risk assessment it is our opinion that when combined, they will provide a reasonable and satisfactory level of bushfire protection to the subject development.

We are therefore in support of the development application.

Should you have any enquiries regarding this project please contact me at our office.

Prepared by
Building Code & Bushfire Hazard Solutions



Duncan Armour
Bushfire Consultant

Reviewed and endorsed by
Building Code & Bushfire Hazard Solutions P/L



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



10.0 Annexure 01

List of Referenced Documents

Australian Building Codes Board (2019). *National Construction Code Volume Two - Building Code of Australia*. ABCB

ELVIS -Elevation -Foundation Spatial Data. Elevation.fsdf.org.au. Available at: <http://elevation.fsdf.org.au/>

Keith, D. (2004). "Ocean Shores to Desert Dunes" Department of Environment and Conservation, Sydney

NSW Department of Planning and Environment (2019). *Planning Portal*. Accessed at: <https://www.planningportal.nsw.gov.au/>

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OEH (2016). *The Native Vegetation of the Sydney Metropolitan Area. Volume 2: Vegetation Community Profiles*. Version 3.0. NSW Office of Environment and Heritage, Sydney.

Site Plan prepared by Fairmont Homes, Job No. 1876, Revision – Contract Plan 2, Dated 20/04/2021.

Rural Fire Service NSW (2005). *Standards for Asset Protection Zones*

Standards Australia (2018). *AS3959 Construction of buildings in bushfire-prone areas*.

Standards Australia (2014). *AS/NZS 1596 The storage and handling of LP Gas*

Acknowledgements to:

Geoscience Australia
NSW Department of Lands – SIXMaps
Street-directory.com.au

Attachments

Attachment 01: s4.14 Compliance Certificate



Building Code & Bushfire Hazard Solutions

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BUSHFIRE RISK ASSESSMENT CERTIFICATE UNDER PART 4 DIVISION 4.3 SECTION 4.14 OF THE EP&A ACT 1979 NO 203

PROPERTY ADDRESS:	152 Bantry Bay Road, Frenchs Forest
DESCRIPTION OF PROPOSAL:	Sole Occupancy Dwelling
PLAN REFERENCE: (relied upon in report preparation)	Site Plan prepared by Fairmont Homes, Job No. 1876, Revision - Contract Plan 2, Dated 20/04/2021.
BAL RATING:	BAL 29 <small>(If the BAL rating is FZ the application is to be referred to NSW RFS for assessment)</small>
DOES THE PROPOSAL RELY ON ALTERNATE SOLUTIONS:	YES <input checked="" type="radio"/> NO <input type="radio"/> <small>(Circle the relevant response)</small> <small>(If YES the application is to be referred to NSW RFS for assessment)</small>
BUSHFIRE ASSESSMENT REPORT REFERENCE:	211437
REPORT DATE:	15 th June 2021
CERTIFICATION NO/ACCREDITED SCHEME	BPAD9400

I Stuart McMonnies of Building Code and Bushfire Hazard Solutions Pty Ltd hereby certify, in accordance with Part 4 Division 4.3 Section 4.14 of the *Environmental Planning and Assessment Act 1979 No 203*:

1. That I am a person recognised by the *NSW Rural Fire Service* as a qualified consultant in bushfire risk assessment; and
2. That subject to the recommendations contained in the Bushfire Risk Assessment Report the proposed development conforms specifications and requirements of the documents entitled *Planning for Bush Fire Protection* prepared by the NSW Rural Fire Service in co-operation with the Department of Planning and any other documents as prescribed by Part 4 Division 4.3 Section 4.14 of the *Environmental Planning and Assessment Act 1979 No 203*.

I am aware that the Bushfire Assessment Report, prepared for the above mentioned site is to be submitted in support of a development application for this site and will be relied upon by Council as the basis for ensuring that the bushfire risk management aspects of the proposed development have been addressed in accordance with *Planning for Bushfire Protection 2019*.

Signature:  Date: 15th June 2021

