



NSW RURAL FIRE SERVICE



The General Manager
Northern Beaches Council
PO Box 82
MANLY NSW 1655

Your reference: DA 2019/0055
Our reference: D19/1753

6 June 2019

Attention: Julie Edwards

Dear Sir/Madam,

Construction of a new dwelling – 9 Minkara Road, BAYVIEW 2104

Reference is made to Council's correspondence dated 24 May 2019 seeking comment from the New South Wales Rural Fire Service (NSW RFS) in relation to the above mentioned Development Application, in accordance with Section 4.14 of the *Environmental Planning and Assessment Act 1979*.

The NSW RFS has reviewed the following documentation in relation to this application:

- A Bushfire Threat Assessment provided by Australian Bushfire Safety & Planning (prepared by John Delany, dated 19 December 2018, Ref: BF – 00297)
- Site plans prepared by Stephen Crosby & Associates Pty Ltd (Drawing No. 2416 – DA01 A; Dated December 2018).

The NSW RFS advises that there are several concerns with the bush fire consultant's assessment of the risk to the proposed development. These concerns relate to the following:

- The inappropriate use of the Short Fire Run (SFR) Methodology:
 - The consultant has incorporated the SFR methodology to several aspects of the proposed development on the subject site. As stated in the NSW RFS methodology guide for SFR (dated May 2019), "*The proposal will need to be supported by a Bush Fire Design Brief (BFDB) which includes the site particulars together with the methodology proposed, and the inputs and outputs from calculations to support the proposal.*" A BFDB was not submitted for the use of the SFR for this application prior to lodgement to Council, or prior to when referred to the NSW RFS for comment.
 - Notwithstanding, the SFR is not considered appropriate for use in this setting due to the connectivity of the vegetation around the site. As also stated within the NSW RFS methodology for SFR "*A proposed SFR must not have connectivity with any other parcels of land containing vegetation capable of supporting a fully*

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developed fire that would directly impact the asset." The bush fire consultant has addressed in their report that a fully developed fire is possible to the northern aspect of the site.

- The performance based modelling provided by the consultant was unable to be replicated by the NSW RFS.
- The modelling provided by the consultant for the fully developed fire to the northern aspect was not able to be replicated by the NSW RFS. A head width greater than 48 metres (as nominated by the consultant) is not supported, with the proposed radiant heat modelled from this aspect exceeding 29kW/m² based on the 44 metre setback to vegetation.

On the basis of the information provided, the NSW RFS is not satisfied that the proposed development is sited outside of a radiant heat exposure of 29kW/m², as proposed by the bush fire consultant.

If you have any queries regarding this advice, please contact Adam Small, Development Assessment and Planning Officer, on 1300 NSW RFS.

Yours sincerely,



Nika Fomin
Manager
Planning and Environment Services (East)