

AMENDED

BUSHFIRE PROTECTION ASSESSMENT

FOR THE PROPOSED SENIORS LIVING COMPLEX

STRATA PLAN 49558

No. 5 SKYLINE PLACE, FRENCHS FOREST

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Assessment Number	Document	Preparation Date	Issue Date	Directors Approval
B172929 - 2	Final	20.04.2018	17.05.2019	<i>G.L.Swain</i>

EXECUTIVE SUMMARY

Australian Bushfire Protection Planners Pty Limited was commissioned to undertake the Bushfire Consultancy for a Development Application to be lodged with Northern Beaches Council for the proposed Seniors Living complex on Strata Plan 49558, No. 5 Skyline Place, Frenchs Forest.

A Bushfire Protection Assessment Report for the proposed development was prepared in May 2018 and assessed by the NSW Rural Fire Service.

An amended application has been lodged with the Northern Beaches Council and correspondence received from the NSW Rural Fire Service which requires the submission of an updated bushfire assessment. This report updates the previous report.

The Development Application seeks approval for the demolition of existing Building E and part of the existing carpark in Strata Plan 49558, modification to the remaining carpark and the construction of the multi-storey Commercial/Seniors Living complex on the northern portion of the land.

The new building will contain a Basement and Lower Ground Floor parking levels, Ground, First and Second floor levels which contain commercial and Independent Living Units.

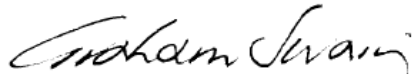
Floor levels 3 – 5 contain two and three bedroom Independent Living Units.

The existing one and two storey warehouses and offices in the southern portion of the site are to be retained.

The vegetation on the land adjacent to the adjoining industrial complex to the west of the development site and to the west of the existing residential development located to the northwest of the development site consists of unmanaged vegetation which is recorded on the Northern Beaches [Warringah] Bushfire Prone Land Map as Category 1 Bushfire Prone Vegetation.

As the buffer zone to this vegetation occupies part of the development site and the proposed development is for aged care accommodation, the proposed development is classified as a '*Special Fire Protection Purpose Development*', pursuant to Section 100B of the Rural Fires Act 1997. Section 4.46(1) of the *Environmental Planning & Assessment Act* defines the proposed development as '*Integrated Development*' which requires the issue of a Bushfire Safety Authority, pursuant to Section 100B of the Rural Fires Act 1997, by the Commissioner of the NSW Rural Fire Service.

This amended report therefore uses the methodology provided by *Planning for Bushfire Protection 2006* to validate the development's compliance with the Asset Protection Zones widths required by Table A2.6 of *Planning for Bushfire Protection 2006* and assesses the requirements of Section 44 of the *Rural Fires Regulation 2013* necessary to provide compliance with *Section 100B* of the *Rural Fires Act 1997 (Amended)* and the issue of a *Bushfire Safety Authority* by the Commissioner of the NSW Rural Fire Service under *Section 100B (4)* of the *Rural Fires Act*.



Graham Swain,
Managing Director,
Australian Bushfire Protection Planners Pty Limited

Fire Prevention Association Member No: 48781

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SECTION 1

INTRODUCTION

1.1 Aim of this Assessment.

The aim of this Bushfire Protection Assessment is to review the proposed development to determine compliance with the deemed-to-satisfy provisions of *Planning for Bushfire Protection 2006* and in particular:

- Determine the formation of the vegetation on and surrounding the development footprint in accordance with the vegetation classification system contained in *Planning for Bushfire Protection 2006*;
- Undertake an assessment to determine the effective slope of the land which will cause the most insignificant fire behaviour on the facility;
- Determine the Fire Danger Index [FDI] for the site;
- Undertake an assessment to determine the adequacy of the bushfire protection measures, including the following matters:
 - (i) The provision of building setbacks (Asset Protection Zones) from vegetated areas and the siting of buildings to minimize the impact of radiant heat and direct flame contact;
 - (ii) Fire fighting water supplies;
 - (iii) Access requirements for emergency service vehicles;
 - (iv) Construction standards to be used for the future buildings within the proposed development to minimize the vulnerability of buildings to ignition from radiation and ember attack;
 - (v) Land management responsibilities; and
 - (vi) Evacuation management.

1.2 Statutory Requirements.

This report has been prepared having regard to the following legislative and planning requirements:

1.2.1 Legislation.

(a) *Environmental Planning and Assessment Act (EPA Act)*

Planning and development within NSW is regulated by the *Environmental Planning & Assessment Act, 1979* (EPA Act).

In relation to bushfire planning for new residential, rural residential and special fire protection purpose developments (including Seniors Living Developments) in bushfire prone areas in NSW, the following section of the EPA Act applies:

(i) **Section 4.14 (1)(b)** states:

“In determining a development application, a consent authority is to take into consideration such of the following matters as are of relevance to the development the subject of the development application:

- *The likely impacts of the development, including environmental impacts on both the natural and built environments and social and economic impacts in the locality – (e.g. natural hazards such as bushfire threat);*

Section 4.14 (1)(c) states:

- *The suitability of a site for development (e.g. bushfires)*

- (ii) **Section 4.46(1)** defines the subdivision of Bushfire Prone Land for residential and rural residential subdivision and the construction of special protection developments that are located in a Bushfire Prone Area as integrated development, which requires authorization under Section 100B of the *Rural Fires Act 1997*.

(b) **Rural Fires Act 1997**

The objectives of the *Rural Fires Act* are to provide:

- The prevention, mitigation and suppression of fires;
- Coordination of bushfire fighting and prevention
- Protection of people and property from fires; and
- Protection of the environment.

In relation to bushfire planning for *Special Fire Protection Purpose Developments* in bushfire prone areas in NSW, Section 100B of the Act applies and provides for the issue, by the Commissioner of the NSW Rural Fire Service, of a Bushfire Safety Authority.

An application for a Bushfire Safety Authority must be lodged as part of the development application process and must demonstrate compliance with *Planning for Bushfire Protection 2006* and other matters which are considered necessary, by the Commissioner, to protect persons, property and the environment from the impact of bushfire.

In relation to the management of bushfire fuels on public and private lands within NSW, Sections 63(1) and 63(2) require public authorities and owners / occupiers of land to take all practicable steps to prevent the occurrence of bushfires on, and to minimize the danger of, the spread of bushfires.

(c) Rural Fires Regulation 2013.

Section 44 of the *Rural Fires Regulation 2013* relates to planning for new residential, rural residential and special fire protection purpose developments in bushfire prone areas in NSW and provides details of the matters that are required to be addressed for the issue of a *Bushfire Safety Authority* under Section 100B of the *Rural Fires Act*.

1.2.2 Planning Policies.

(a) Planning for Bushfire Protection – 2006 (Rural Fire Service).

This document provides guidance on the planning and development control processes in relation to bushfire protection measures for residential subdivision and ‘*Special Fire Protection Purpose Developments*’ in bushfire prone areas. The Commissioner may determine, under Section 100B of the *Rural Fires Act*, additional measures that are considered necessary to protect the development against the impact of bushfire.

1.3 Development Proposal.

The development proposal is for the construction of a Seniors Living complex on Strata Plan 49558, No. 5 Skyline Place, Frenchs Forest.

The Development Application also seeks approval for the demolition of Building E and part of the existing carpark in Strata Plan 49558, modification to the remaining carpark and the construction of the multi-storey Seniors Living complex on the northern portion of the land.

The new building will contain a Basement and Lower Ground Floor parking levels, Ground, First and Second floor levels which contain commercial and Independent Living Units.

Floor levels 3 – 5 contain two and three bedroom Independent Living Units.

The existing one and two storey warehouses and offices in the southern portion of the site are to be retained.

A copy of the proposed Site Plan is provided in Figure 1 on Page 9.

A copy of the Plans and Elevations is provided on Pages 10 – 12.

Figure 1 – Site Plan of the proposed development.

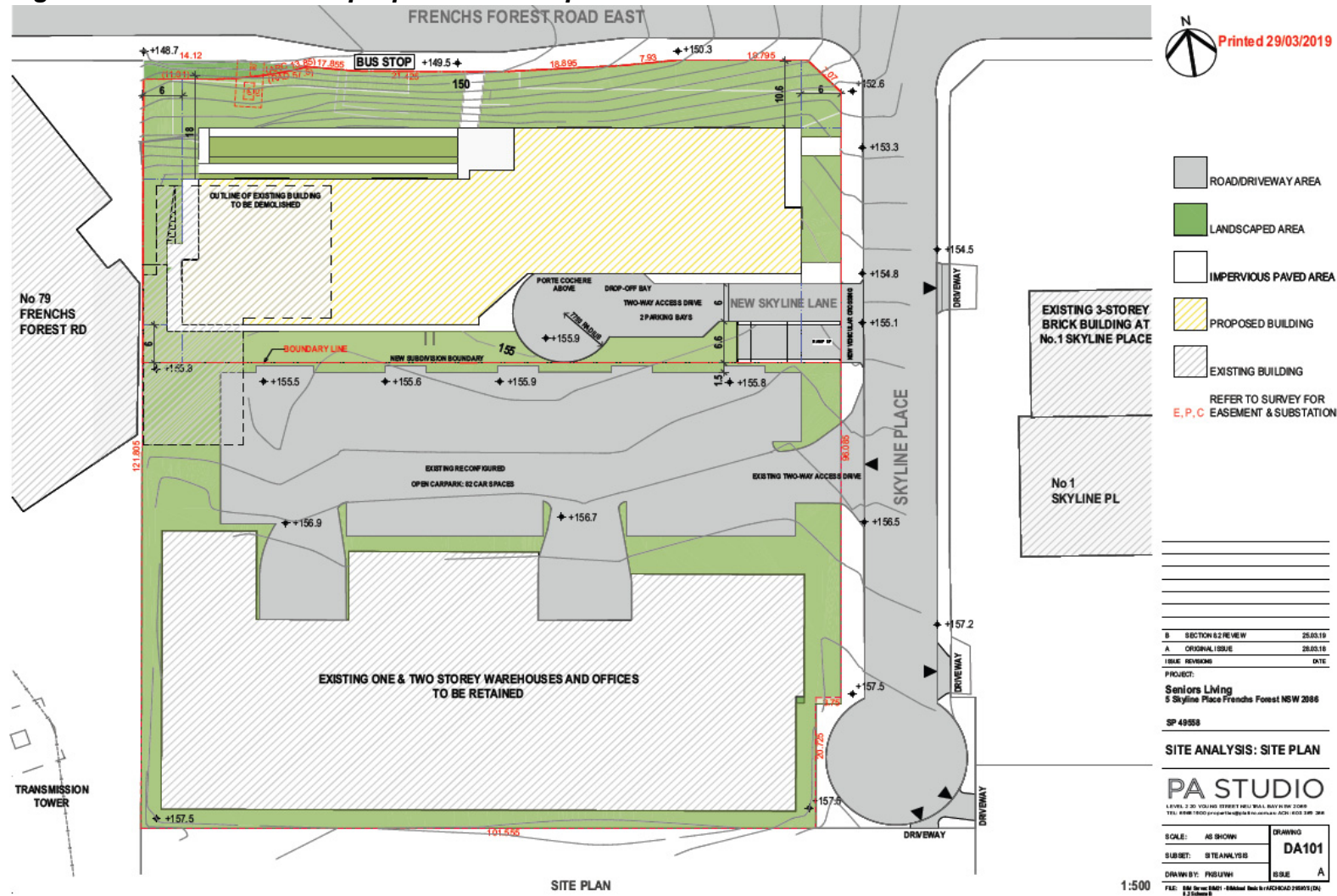


Figure 2 – Demolition Plan of the proposed development.

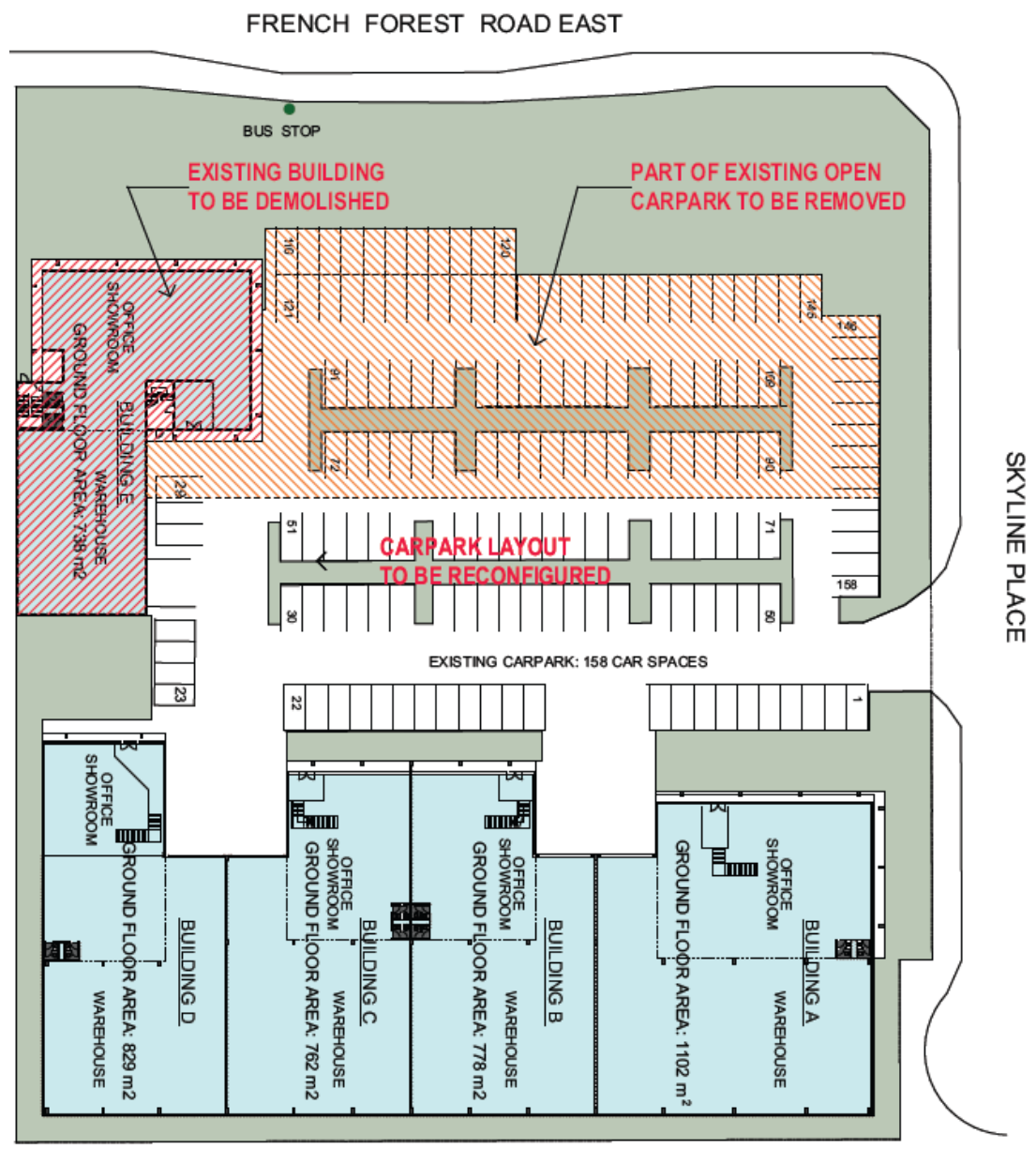


Figure 3 – Ground Floor Plan of the proposed development.

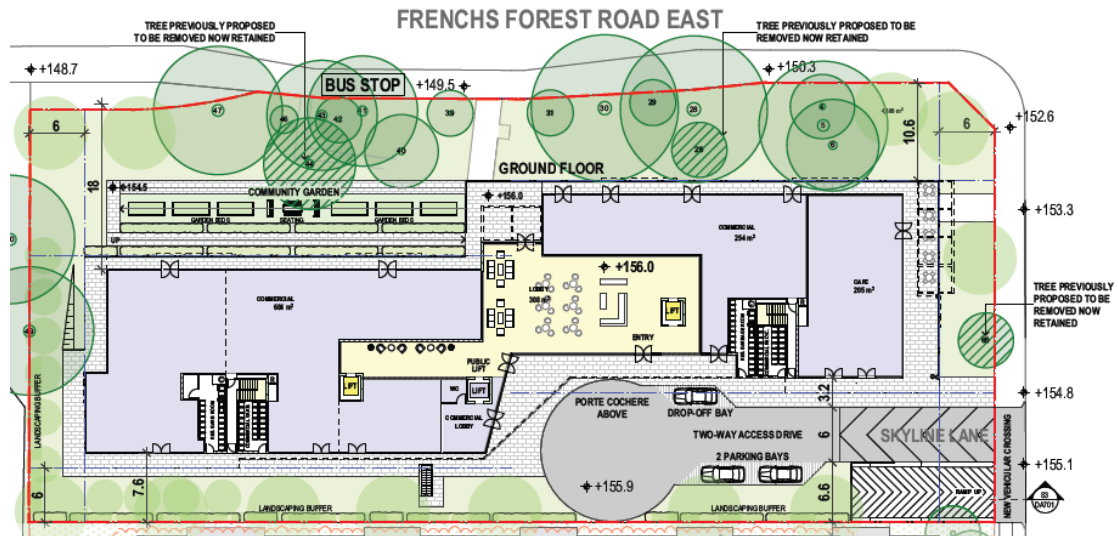
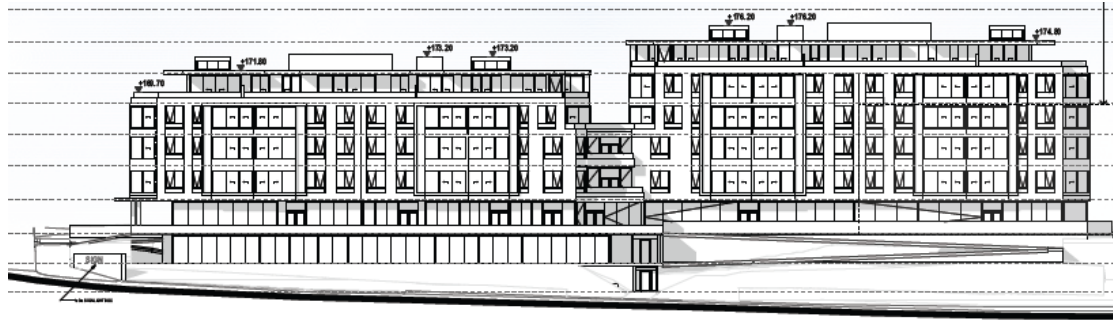


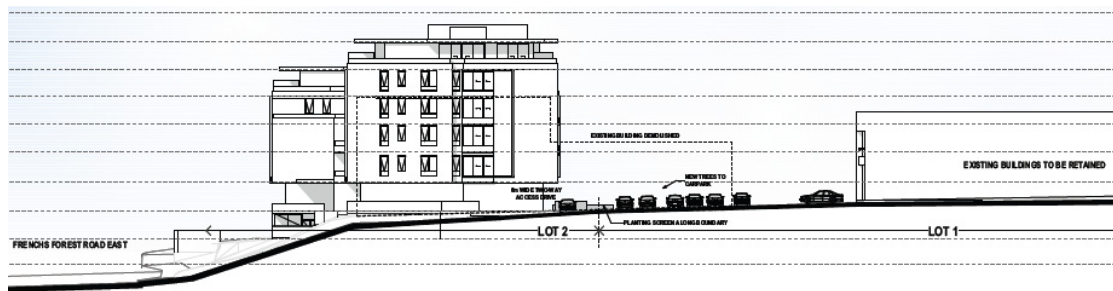
Figure 4 – First & Second Floor Plan of the proposed development.



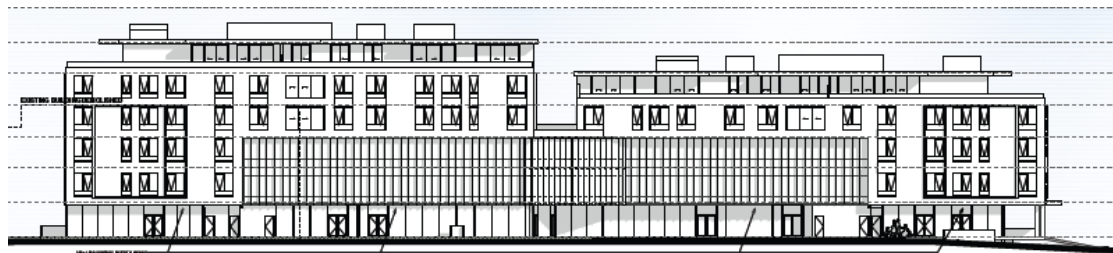
Figure 5 – Elevations of the proposed development.



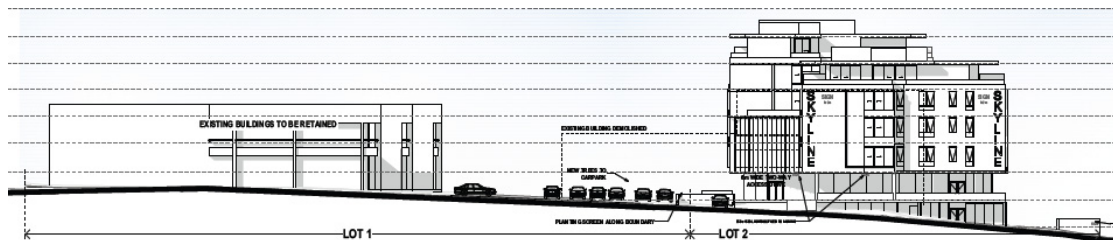
NORTH ELEVATION



WEST ELEVATION



SOUTH ELEVATION



EAST ELEVATION

02

1.4 Documentation reviewed in this Assessment.

The following documents were reviewed in the preparation of this report:

- Architectural Plans and Elevations prepared by PA Studio;
- *Planning for Bushfire Protection 2006* prepared by the NSW Rural Fire Service;
- Australian Standard AS3959 – 2009 – ‘*Construction of Buildings in Bushfire Prone Areas*’;
- *Rural Fires Regulation 2013*;
- Northern Beaches Bushfire Prone Land Map.

1.5 Site Inspection.

Graham Swain of ***Australian Bushfire Protection Planners Pty Limited*** inspected the development site on the 11th of March 2018 to assess the topography, slopes and vegetation classification within and adjoining the development property, existing bushfire mitigation measures and a visual assessment of bushfire threat.

Adjoining properties were also inspected to determine the surrounding land use / land management and extent of bushfire prone vegetation.

SECTION 2

PROPERTY DESCRIPTION

2.1 Location & Description.

The proposed Seniors Living complex occupies the northern portion of the land known as Strata Plan 49558, No. 5 Skyline Place, Frenchs Forest.

The site contains existing industrial complexes with the Development Application proposing to demolish Building E and part of the existing external whilst retaining the existing industrial buildings in the southern portion of the site.

Figure 6 – Location of the proposed Seniors Living Complex Site.



2.2 Existing Land Use.

The development site contains an existing industrial complex and external carparking areas.

2.3 Surrounding Land Use.

The land use to the east, south and west consists of industrial development. The land use to the north of Frenchs Forest Road East, to the north of the site consists of residential development – refer to Figure 6 – Aerial Photograph on Page 14.

2.4 Topography.

Appendix 2 of *Planning for Bushfire Protection 2006* states that slopes should be assessed, over a distance of at least 100m from a development site, and that the gradient of the land should be determined which will most significantly influence the fire behaviour on the site.

(i) Within the Development Site.

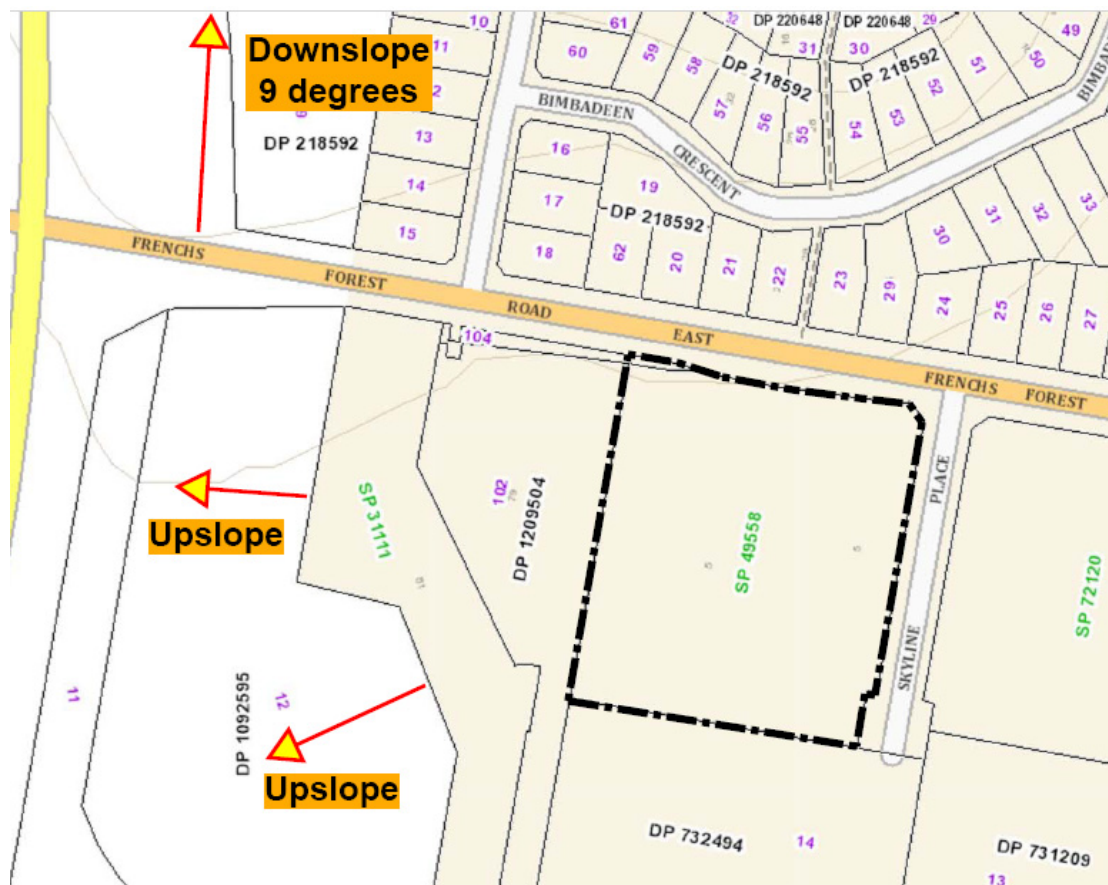
The land within the development site falls gently to the north, across the existing carpark.

(ii) The land containing the Bushfire Prone Vegetation.

The land located to the southwest and west of the adjacent industrial development, to the southwest and west of the development site rises to the Wakehurst Parkway road corridor.

The land to the west of the residential development, to the northwest of the development site falls to the north, along the watercourse at 9 degrees – refer to Figure 7 – Cadastre Plan on Page 16.

Figure 7 – Cadastre Map.



2.5 Vegetation.

Appendix A2.3 of *Planning for Bushfire Protection 2006* provides a methodology for determining the predominant bushfire prone vegetation for at least 140 metres in all directions from the proposed building.

Vegetation is classified using Table A2.1 of *Planning for Bushfire Protection 2006*, which classifies vegetation types into the following groups:

- (a) *Forests [wet & dry Sclerophyll forests];*
- (b) *Woodlands;*
- (c) *Plantations – being pine plantations not native plantations;*
- (d) *Forested Wetlands;*
- (e) *Tall Heaths;*
- (f) *Freshwater Heaths;*
- (g) *Short Heaths;*
- (h) *Alpine Complex;*
- (i) *Semi – arid Woodlands;*
- (j) *Arid Woodlands; and*
- (k) *Rainforests.*

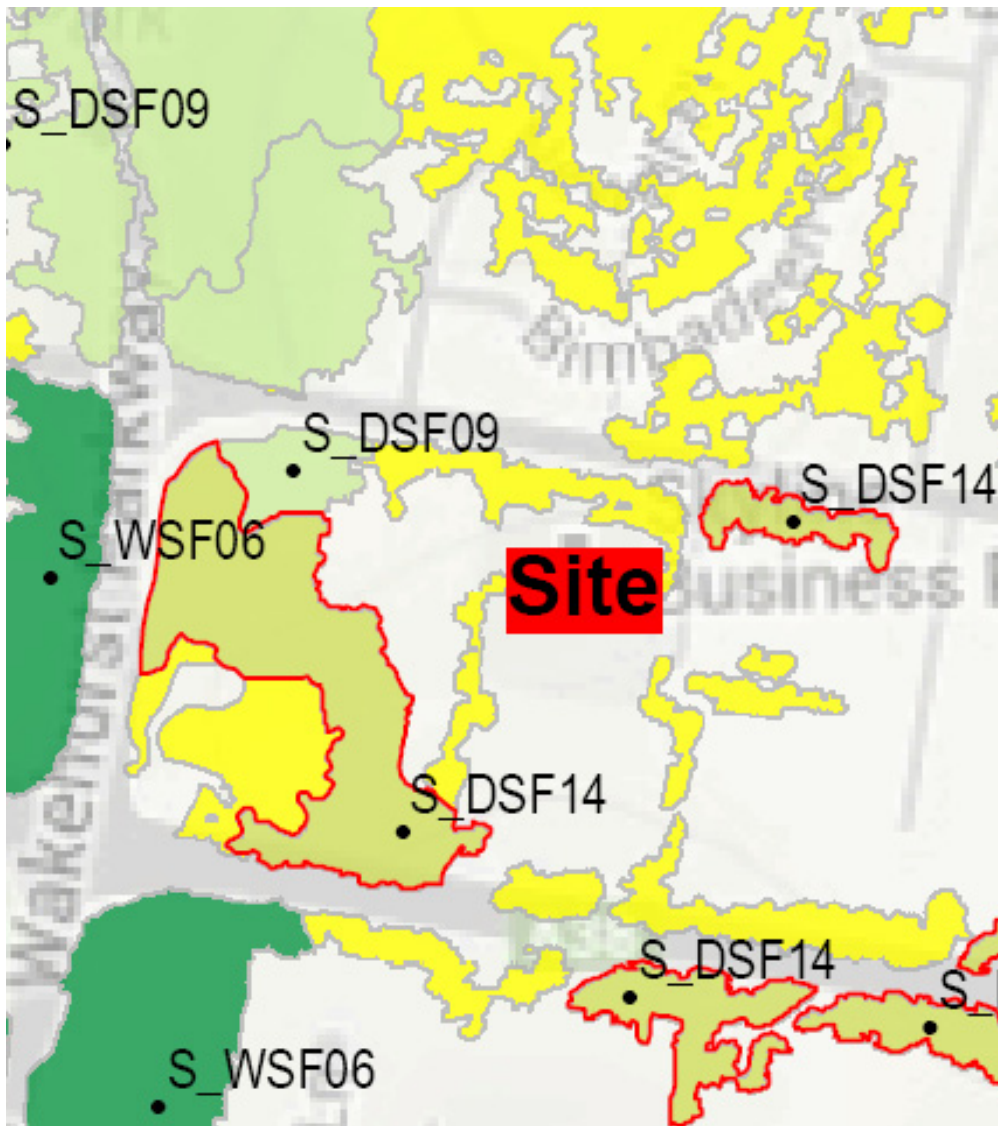
The vegetation within the development site consists of managed landscaped gardens.

2.6 Vegetation within 140 metres of the proposed Seniors Living Complex.

The vegetation on the land to the west of the adjoining industrial complex consists of Coastal Sandstone Gully Forest [S_DSF09] and Sydney Ironstone Bloodwood-Silvertop Ash Forest [S_DSF14].

The vegetation on the land to the west of the residential development northwest of the development site is Coastal Sandstone Gully Forest – refer to Figure 8 – Plan of Vegetation Communities below.

Figure 8 – Plan of Vegetation Communities



Legend:

- S_DSF14: Sydney Bloodwood-Silvertop Ash Forest.
- S_DSF09: Coastal Sandstone Gully Forest.

2.7 Significant Environmental Features on the Development Site.

The development site does not contain areas of Geological interest; Land slip areas or National Parks Estate, SEPP 14 Wetland, SEPP 44 Koala Habitat or Steep Lands [>18 degrees] or riparian corridors.

2.8 Known Threatened Species, population or ecological community within the Development Site.

There are no known threatened species, population or ecological communities within the development site.

2.9 Details and location of Aboriginal relics or Aboriginal place.

There are no known Aboriginal relics or Aboriginal places within the development site.

SECTION 3

FIRE MANAGEMENT RESPONSIBILITIES

Fire management within the development site is the responsibility of:

3.1 Northern Beaches Council.

Northern Beaches Council, being a local authority, has responsibility, under Section 100E (1) of the *Rural Fires Act 1997 [as amended]*, to issue a notice in writing requiring an owner / occupier of private land within the LGA to carry out bushfire hazard reduction on that land.

3.2 New South Wales Rural Fire Service.

The NSW Rural Fire Service (RFS) has the responsibility for undertaking fire suppression activities, hazard management activities and other functions relative to emergency management, within its areas of operation. *Section 73* of the *Rural Fires Act (1997)* enables the Commissioner to carry out bush fire hazard reduction works on any land as required by a bush fire risk management plan if the work has not been carried out satisfactorily. Incurred costs can be recovered as a debt owed to the Crown.

3.3 Fire & Rescue New South Wales.

Fire & Rescue NSW has the responsibility for undertaking fire suppression activities, and other functions relative to emergency management, within its area of operation and through Mutual Aid Agreements, provide assistance to the NSW Rural Fire Service, particularly for structural fire operations within the NSW Rural Fire Brigade Districts. Hazmat management within New South Wales is the responsibility of Fire & Rescue NSW.

3.4 Northern Beaches Bush Fire Management Committee.

The Northern Beaches Bushfire Management Committee has the responsibility for planning for co-ordinated fire fighting activities / hazard management activities on a local government level. It is not an operational organization, a fire fighting organization or a funding source for fire management activities.

The Bush Fire Management Committee is supported by the following provisions of the Rural Fires Act 1997:

- **Section 52** requires each Bush Fire Management Committee to prepare a draft bush fire management plan for their local areas which includes a plan of operations and a bush fire risk management plan.
- **Section 54** of the Act specifies that a draft bush fire risk management plan is to 'set out schemes for the reduction of bush fire hazards in the rural fire district or other part of the State'.

A draft bush fire risk management plan may also restrict or prohibit the use of fire or other fire hazard reduction activities in all or specified circumstances or places to which the plan applies.

3.5 Public Authorities & owners/occupiers of land.

The Rural Fires Act, 1997 provides several legislative opportunities to require Public Authorities, land owners and occupiers to manage hazardous fuels. These are listed below:

63 Duties of public authorities and owners and occupiers of land to prevent bush fires

- (2) It is the duty of the owner or occupier of land to take the notified steps (if any) and any other practicable steps to prevent the occurrence of bush fires on, and to minimise the danger of the spread of bush fires on or from, that land.
- (3) A public authority or owner or occupier is liable for the costs incurred by it in performing the duty imposed by this section.
- (4) The Bush Fire Co-ordinating Committee may advise a person on whom a duty is imposed by this section of any steps (whether or not included in a bush fire risk management plan) that are necessary for the proper performance of the duty.

In this section ***notified steps*** means:

- (a) any steps that the Bush Fire Co-ordinating Committee advises a person to take under subsection (4), or
- (b) any steps that are included in a bush fire risk management plan applying to the land.

66 Bush Fire Hazard Reduction Notice

- (1) A hazard management officer may, by notice in writing, require the owner or occupier [not being a public authority] of any land to carry out bushfire hazard reduction work specified in the notice on the land.
- (2) A hazard management officer must serve a notice under this section if required to do so by a bushfire risk management plan applicable to the land that is in force.
- (3) A hazard management officer must issue a bushfire hazard reduction certificate in respect of any bushfire hazard reduction work required by a notice issued in accordance within section (2) unless the work required by the notice:

- Is otherwise authorised to be carried out, or
 - Is not required to be authorised to be carried out under this or any other Act.
- (6) The requirements and conditions so specified must include any requirements in a bushfire risk management plan that is applicable to the land and is in force and may include a requirement or condition that the burning of fire breaks or of combustible material:
- (a) must in fire district constituted under the Fire Brigades Act 1989 be carried out by or under the supervision of the fire brigade or an officer in charge of the fire brigade;
 - (b) must outside a fire district, be carried out by or under the supervision of the rural fire brigade specified in the notice or an appropriate officer of the rural fire brigade or any hazard management officer.
- (7) *A notice requiring the establishment of a firebreak cannot require an occupier or owner to kill or remove any trees that are reasonably necessary for shade, shelter, windbreak or fodder purposes or the protection of threatened species, populations, ecological communities or critical habitats within the meaning of the 'Threatened Species Conservation Act 1995.*
- (8) An occupier or owner to whom a bushfire hazard reduction notice is given must, despite the fact that a fire permit has not been granted under Division 5, comply with the requirements specified in the notice.

Section 70(2) states that *'if within the time specified in the relevant notice the owner or occupier to whom it is given fails to comply with any requirement of the notice, the Commissioner may, without prejudice to liability of the owner or occupier, enter on the land and carry out the bushfire hazard reduction work the owner or occupier was required to do under the notice'.*

Section 70(3) states that *'any costs incurred by the Commissioner in carrying out such work may be recovered from the owner or occupier of the land as a debt due to the Crown in a court of competent jurisdiction'.*

3.6 Bushfire Hazard Management.

The proposed development includes the maintenance of the landscaped gardens within the curtilage to the building.

SECTION 4

PRECINCT LEVEL ASSESSMENT

4.1 Certified Bushfire Prone Land Map.

Figure 9 is a copy of an extract of the Northern Beaches Council Bushfire Prone Land Map showing the extent of the Category 1 Bushfire Prone Vegetation on the land to the northwest and west of the development site.

Figure 9 – Extract from the Northern Beaches Bushfire Prone Land Map.



Legend

-  Bush Fire Prone Land - Vegetation Category 1
-  Bush Fire Prone Land - Vegetation Category 2
-  Bush Fire Prone Land - Vegetation Buffer - 100m & 30m

SECTION 5

BUSHFIRE PROTECTION ASSESSMENT

5.1 Introduction.

Section 44 of the *Rural Fires Regulation 2013* requires that an application for a *Bushfire Safety Authority* must include a bushfire assessment for the proposed development (including the methodology used in the assessment) that addresses the extent to which the development provides:

- *Asset protection zones;*
- *The siting and adequacy of water supplies for fire fighting operations;*
- *Capacity of public roads to handle increased volumes of traffic during a bushfire emergency;*
- *Whether or not public roads link with the fire trail network and have two way access;*
- *The adequacy of access and egress for the purposes of emergency response;*
- *The adequacy of bushfire maintenance plans and fire emergency procedures;*
- *The construction standards to be used for building elements.*

5.2 Asset Protection Zones.

The proposed building is located one hundred and fifteen [115] metres from the Coastal Sandstone Gully Forest on the land to the west of the residential development, northwest of the development site. This separation distance exceeds the maximum width of Asset Protection Zone required by Table A2.6 of *Planning for Bushfire Protection 2006*.

The proposed building is located one hundred [100] metres from the Coastal Sandstone Gully Forest on the land to the west of the adjoining industrial complex located to the west of the development site. This separation distance exceeds the maximum width of Asset Protection Zone required by Table A2.6 of *Planning for Bushfire Protection 2006*.

The proposed building is located ninety [90] metres from the Coastal Sandstone Gully Forest on the upslope land to the southwest of the adjoining industrial complex located to the southwest of the development site.

This separation distance exceeds the deemed to satisfy width of Asset Protection Zone required by Table A2.6 of *Planning for Bushfire Protection 2006*.

Figure 10 provides a plan of the available Asset Protection Zones to the proposed building.

Figure 9 – Cadastre Plan showing the available separation distances to unmanaged Bushfire Prone Vegetation.



5.3 Management of Asset Protection Zones.

The management of the landscaped gardens within the development site will be undertaken to the prescriptions of Appendix A5.4 & Appendix A5.5 of *Planning for Bushfire Protection 2006* and the Rural Fire Service “Standards for Asset Protection Zones” in order to achieve Inner Protection Area standards.

This management will be established by way of a Positive Covenant – pursuant to Section 88B of the *Conveyancing Act 1919* – created on the development site.

5.4 Assessment of Bushfire Attack (Construction Standards).

The construction of the proposed building shall comply with Section 3 and 5 [BAL 12.5] Australian Standard A.S. 3959 – 2009 ‘Construction of buildings in bushfire prone areas’ and Section A3.7 Addendum Appendix 3 of Planning for Bushfire Protection 2006.

5.5 Water Supplies for Fire Fighting Operations.

The proposed Seniors Living complex will be connected to the Sydney Water reticulated supply with booster valve, hydrants and hose reels installed to comply with A.S. 2419.1 – 2005.

Electricity and gas supplies to the complex will be located underground and therefore present no external source for ignition of vegetation.

5.6 Access for Fire Fighting Operations.

The internal access road shall be designed to achieve compliance with Section 4.2.7 of *Planning for Bushfire Protection 2006*”, including the provision of a cul-de-sac which accommodates a NSW Rural Fire Service Category 1 Appliance and Fire & Rescue NSW Pumper/Composite Appliance.

5.7 Emergency Management for Fire Protection / Evacuation.

A site specific ‘*Emergency Management Plan*’ shall be prepared for the complex.

This document shall be prepared and submitted to Northern Beaches Council as part of the Construction Certificate process. The Plan shall include the following information:

- (a) Under what circumstances will the facility are evacuated;
- (b) Where will the persons be relocated to;
- (c) The roles & responsibilities of person co-ordinating the evacuation;
- (d) Roles & responsibilities of persons remaining with the complex after evacuation;
- (e) A procedure to contact the NSW Rural Fire Service District Office/Fire & Rescue NSW to inform them of the evacuation and where the occupants will be evacuated to.

SECTION 6

CONCLUSION

This amended report has examined the Development Application which is to be lodged with Northern Beaches Council for the proposed Seniors Living complex on Strata Plan 49558, No. 5 Skyline Place, Frenchs Forest.

The Development Application also seeks approval for the demolition of existing Building E and part of the existing carpark in Strata Plan 49558, modification to the remaining carpark and the construction of the multi-storey Seniors Living complex on the northern portion of the land.

The new building will contain a Basement and Lower Ground Floor parking levels, Ground, First and Second floor levels which contain commercial and Independent Living Units.

Floor levels 3 – 5 contain two and three bedroom Independent Living Units.

The existing one and two storey warehouses and offices in the southern portion of the site are to be retained.

The site is recorded on the Northern Beaches Bushfire Prone Land Map as being within the buffer zone to Bushfire Prone Vegetation and therefore the proposed development, being for seniors living accommodation, is deemed to be a '*Special Fire Protection Purpose*' development under Section 100B (6) (d) of *Planning for Bushfire Protection 2006* and therefore requires the consent of the Commissioner of the NSW Rural Fire Service under Section 100B of the *Rural Fires Act 1997*.

This report has examined the proposal to construct the proposed seniors living accommodation building on the site and has determined that complying widths of Asset Protection Zones [115m to the northwest and 90 – 100m to the west and southwest] is available.

The location of the seniors living accommodation complex therefore provides the deemed-to-satisfy Asset Protection Zones widths required to reduce the potential level of radiant heat on the exterior of the buildings to less than 10kW/m² and therefore satisfies the NSW Rural Fire Service's prescription for a '*Special Fire Protection Purpose*' located in a bushfire prone area. The report has also found that the proposed access driveway can satisfy the NSW Rural Fire Service access for fire-fighting operations provisions and has made recommendations on the provision of fire-fighting water supplies, construction standards to the buildings, management of the Asset Protection Zones and the implementation of an Emergency Management Plan for the facility.

The proposed development therefore complies with the aim and objectives of *Planning for Bushfire Protection 2006* in relation to the proposed land use [Seniors Living Development].

Table 1 summarises the extent to which the proposed development conforms to the deemed-to-satisfy specifications of *Planning for Bushfire Protection 2006* and the specific advice provided by the NSW Rural Fire Service.

Table 1. Compliance with the deemed-to-satisfy provisions of *Planning for Bushfire Protection 2006*.

Bushfire Protection Measure	Compliance with deemed-to-satisfy provisions of <i>Planning for Bushfire Protection 2006</i>.
Asset Protection Zone/defendable space setbacks	YES – The widths of Asset Protection Zone/Defendable Space exceed Table A2.6 [Special Fire Protection Purpose Development] and Section 4.3.6(f) of <i>Planning for Bushfire Protection 2006</i> .
The siting and adequacy of water supplies for fire fighting	YES – A hydrant supply is being installed for fire-fighting operations, in accordance with AS 2419.1 - 2005.
Design of Public Roads	YES – The internal access road complies with the specifications of Section 4.1.3(1) and Section 4.2.7 of <i>Planning for Bushfire Protection 2006</i> .
Design of Fire Trail network	No fire trail network required.
Adequacy of emergency response access and egress	YES – Proposed internal access road provides two-way road access to the site. The internal road network provides safe access/egress for emergency service vehicles and complies with the deemed-to-satisfy access provisions as defined by Section 4.1.3 & 4.2.7 of <i>Planning for Bushfire Protection 2006</i> .
Adequacy of bushfire maintenance plans and fire emergency procedures	YES – There is no requirement for the implementation of a bushfire maintenance plan/fire emergency procedures.
Building construction standards	YES – The Seniors Living complex will not be exposed to radiant heat levels greater than 10kWm ² . BAL 12.5 construction standards shall apply to the building. Gutter protection shall apply to the building.
Adequacy of sprinkler systems and other fire protection measures to be incorporated into the development	Not applicable.



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REFERENCES:

- N.S.W Rural Fire Service – *Planning for Bushfire Protection 2006*;
- *Environmental Planning & Assessment Act – 1979*;
- *Rural Fires Act – 1997*;
- *Rural Fires and Environmental Assessment Legislation Amendment Act 2002*;
- *Rural Fires Regulation 2013*;
- NSW Rural Fire Service – *Guideline for Bushfire Prone Land Mapping 2013*;
- *Bushfire Environmental Assessment Code 2006*;
- Building Code of Australia;
- Australian Standard A.S 3959-2009 “*Construction of Buildings in Bushfire Prone Areas*”;
- Northern Beaches Bushfire Prone Land Map.