## **Bushfire Planning Services Pty Limited**



Matthew Willis (Grad Dip Design for Bushfire Prone Areas.) 15 Parkcrest Place Kenthurst 2156

> Tel: 02 96543228 Mob: 0428 408 577

Email: mattw@bushfireconsultants.com.au

Thursday, 10 February 2022.

Address; 65 Hillside Road Newport.

Lot and DP; Lot 46, Dp 9224.

This letter is in response to a Rural Fire Service request for further information on a recently submitted Development Application, for the above address. The RFS raise concern that the undeveloped lot to the west of the subject lot "cannot be considered as a non-hazard without a plan of management or similar".

As outlined in the original assessment, the area of vegetation within a Council reserve to the west of the subject lot that is known as "Kanimbla Reserve" was previously mapped as a bushfire hazard in the Council's Bushfire Prone Land Map.

When the Council's Bushfire Prone Land Map was recently updated, the Bushfire Management Committee including Council, Fire and Rescue New South Wales and the NSW Rural Fire Service all agreed to the removal of this area of vegetation as a hazard due to it not being a significant hazard given the vegetation type, the slope beneath the hazard, the size and shape of the vegetation (very short fire runs) and its position in relation to other bushfire prone land. The reserve does not have a bushfire management plan as its not considered a bushfire hazard.

There are many other areas of similar vegetation within the Greater Sydney area that are not mapped as hazards, do not have specific plans of management in place and do not trigger any bushfire requirements for nearby houses.

Kanimbla Reserve does not have a bushfire management plan as its not considered a bushfire hazard as it doesn't not fit the guidelines to be mapped as a hazard.

This company has spoken to Inspector George Sheppard from the Rural Fire Service, Terrey Hills Fire Control Centre who verified that the area in question was not a significant fire hazard and had been intentionally removed from the Bushfire Prone Land Map due to its limited potential to support a significant bushfire.

Notwithstanding the above, the assessment provided by this company for the proposed development considered the limited potential of the vegetation within Kanimbla Reserve and the effect it may have on the subject lot.

To this end, the recommendations contained within the report recommended BAL-29 for the entire development and did not apply shielding to the non-hazard side of the property. In addition, the previous assessment recommended the upgrading of the existing building for Ember Protection which is an additional protection measure over and above the usual requirements of Planning for Bushfire Protection.

Should the vegetation to the west be considered as a hazard, the construction requirements needed to compensate for the buildings proximity to the non-hazard would be onerous and it is highly unlikely that the proposal would proceed thereby missing out on an opportunity to create a Better Bushfire Outcome for the existing dwelling.

By the recommended ember upgrading alone, the building's chances of survival from a bushfire in the general vicinity would be improved by up to 95%.

## In summary;

- Even without a Bushfire Management Plan, Kanimbla Reserve was recently removed from the Bushfire Prone Land Map as a hazard by the Northern Beaches Council and approved for the NSWRFS Commissioner, as it was considered to be an insignificant hazard.
- The removal of this insignificant hazard from the Bushfire Prone Land Map was supported by the Commissioner of the Rural Fire Service.
- Despite the above, the suite of recommendations contained within the submitted bushfire assessment report recommended construction levels above and beyond what is normally required due to the presence of the nearby reserve and its limited potential to carry fire.

Given the "non-hazard" status of the vegetation within Kanimbla Reserve and the construction recommendation contained within the submitted assessment it is considered that the recommendation within the previous assessment achieves a logical, practical, and common sense outcome for the proposed building.

Given that the Bushfire Management Committee including the Rural Fire Service, supported by its Commissioner, Council and NSW Fire and Rescue have all already evaluated the vegetation in Kanimbla Reserve to be insignificant it is considered that to now request a plan of management is unwarranted as it has already been evaluated to be a insignificant area of vegetation.

If any further clarification is required for this report, please do not hesitate to contact me using the details above.

Yours Sincerely

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Matthew Willis

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