

Bushfire Hazard Assessment

Strata Warehouse and Storage

14 Aquatic Drive, Frenchs Forest

Prepared for

Goodman Property Services (Aust.) Pty Ltd

Version 1.1

17 April 2025



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1. Summary

Table 1 is a summary of compliance with relevant documents and approaches to limit bushfire attack and meet the requirements of the NSW planning framework for new development in Bushfire Prone Areas.

Table 1: Summary

Planning for Bushfire Protection 2019 Classification	"Other" commercial/ industrial
Location	Lot 102 DP1211755
Local Government Area	Northern Beaches
Can this proposal comply with AS3959, 2009	AS3959, 2009 does not apply as a DTS Provision
Does this development comply with the requirements of <i>Planning for Bushfire Protection 2019</i>?	YES
Does this development comply with the Aims and objectives of <i>Planning for Bushfire Protection 2019</i>?	YES
Is referral to the NSW RFS required?	NO
Assessment Framework	☒ <i>Planning for Bushfire Protection 2019</i> ☒ Meets the deemed to satisfy provisions ☐ Alternate solution/ performance-based assessment

2. Introduction

This Bushfire Hazard Assessment has been prepared Blackash Bushfire Consulting on behalf of Goodman Property Services (Aust.) Pty Ltd (Goodman) to accompany a development application for self-storage units and warehouse and distribution centre uses at 14 Aquatic Drive, Frenchs Forest.

The site is shown in Figure 1.

Industrial development such as the proposed warehouse is designated as “other” development in PBP 2019. As “other” development, the proposed development has considerable flexibility and the nature of the development often results in the structures providing a higher degree of bushfire resistance that required by the NSW Rural Fire Service (NSW RFS). As “other” development, a key issue for the proposal will be meeting the aim and objectives of *Planning for Bushfire Protection 2019* and the performance requirements for industrial development.

This report has been completed having regard to the fact the development is on bush fire prone land and ensuring the proposed bush fire protection measures provide compliance with *Planning for Bush Fire Protection 2019*.

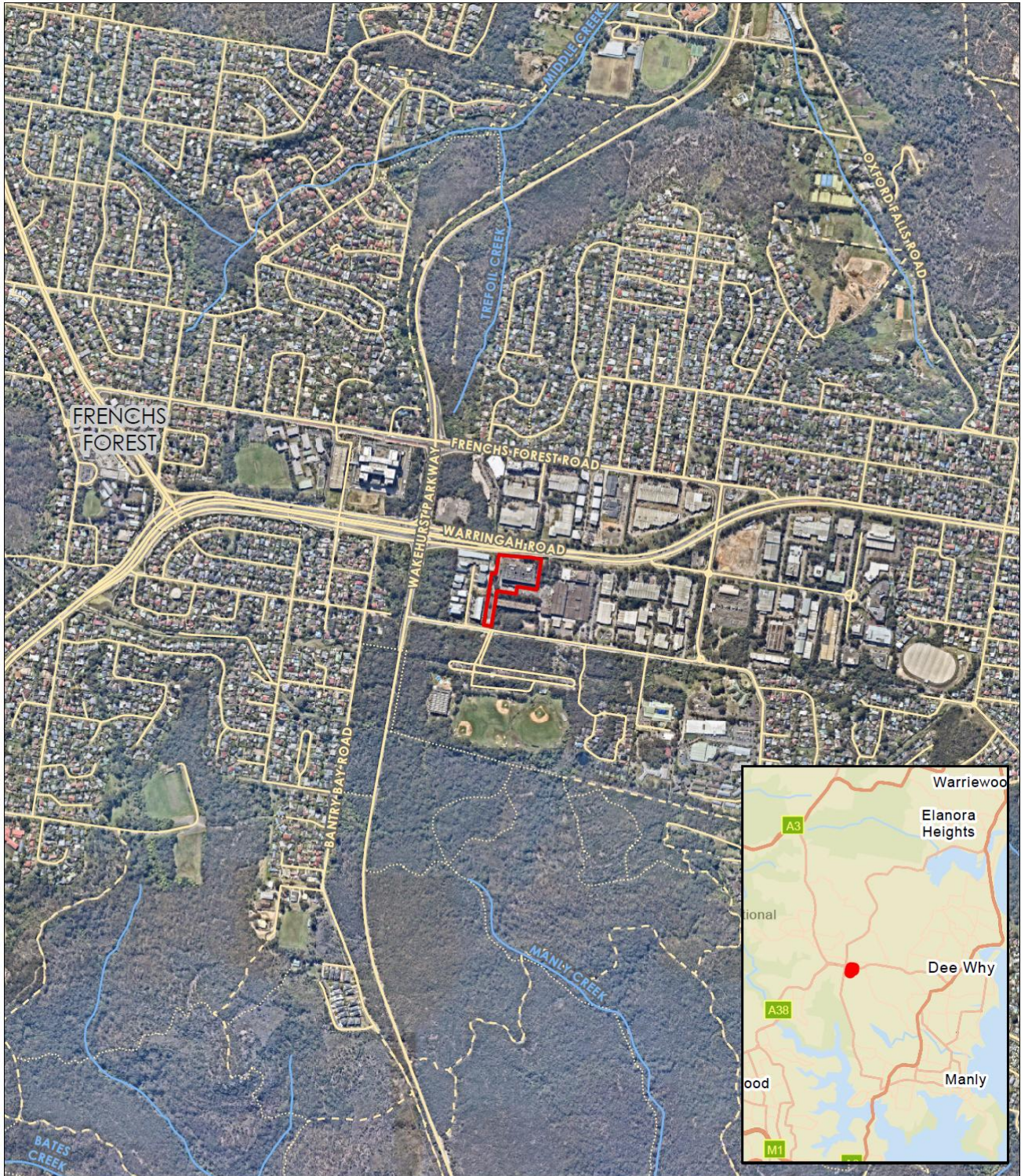
This assessment has been prepared by Corey Shackleton, Principal Bushfire & Resilience (FPAA BPAD Level 3 Certified Practitioner No. BPD-L3-34603) who is recognised by the NSW RFS as qualified in bushfire risk assessment and have been accredited by the Fire Protection Association of Australia as a suitably qualified consultant to undertake alternative solution proposals.

3. Site Context

The site is shown in Figure 1 and forms part a larger industrial precinct along Warringah Road.

The site is in the Northern Beaches Local Government Area (LGA). This site is located on the southern side of Warringah Road and within the broader Frenchs Forest Business Park. It currently hosts an existing four storey commercial building which is proposed for demolition under this application.

The site is surrounded by existing industrial development. The site gains access from Aquatic Drive in the south and adjoins Warringah Road on the northern boundary.



Legend

Subject Land



Date: 8/11/2022

0 0.25 0.5

Kilometers

Coordinate System: GDA 1994 MGA Zone 56

Imagery: © Nearmap

Figure 1: Site Location

4. Legislative Framework

The proposed industrial development is designated as “other” development by the PBP 2006 and PBP 2019. The NSW RFS has reviewed PBP 2006 and now released a new document known as *Planning for Bushfire Protection 2019* (PBP 2019) and the NSW RFS has requested that all new proposals are assessed against PBP 2019.

The site is identified as ‘bushfire prone land’ (see Figure 4) for the purposes of Section 10.3 of the *Environmental Planning and Assessment Act, 1979* (EPA Act) and the legislative requirements for development on bushfire prone lands are applicable. All development on bushfire prone land must consider and comply with PBP 2019. However, industrial development has considerable flexibility and the nature of the development often results in the structures providing a higher degree of bushfire resistance than required by the NSW RFS.

As “other” development, the proposed industrial development and future development is addressed through demonstrating compliance with the aim and objectives of PBP.

Under the building classification system within the *National Construction Code* (NCC), Class 5 to 8 buildings include offices, shops, factories, warehouses, public car parks and other commercial and industrial facilities. The NCC does not provide for any bushfire specific performance requirements for these particular classes of building. As such the *Australian Standard for Construction of Buildings in Bushfire Prone Areas* (AS 3959) and the NASH Standard are not considered as a set of ‘deemed to satisfy’ provisions. However, compliance with AS 3959 and NASH should be considered when meeting the aims and objectives of PBP.

Whilst bushfire is not captured in the NCC for Class 5-8 buildings or storage of the pallets, PBP 2019 articulates the following objectives which will be applied in relation to access, water and services, and emergency and evacuation planning:

1. to provide safe access to/from the public road system for firefighters providing property protection during a bush fire and for occupant egress for evacuation;
2. to provide suitable emergency and evacuation (and relocation) arrangements for occupants of the development;
3. to provide adequate services of water for the protection of buildings during and after the passage of bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building; and
4. provide for the storage of hazardous materials away from the hazard wherever possible.

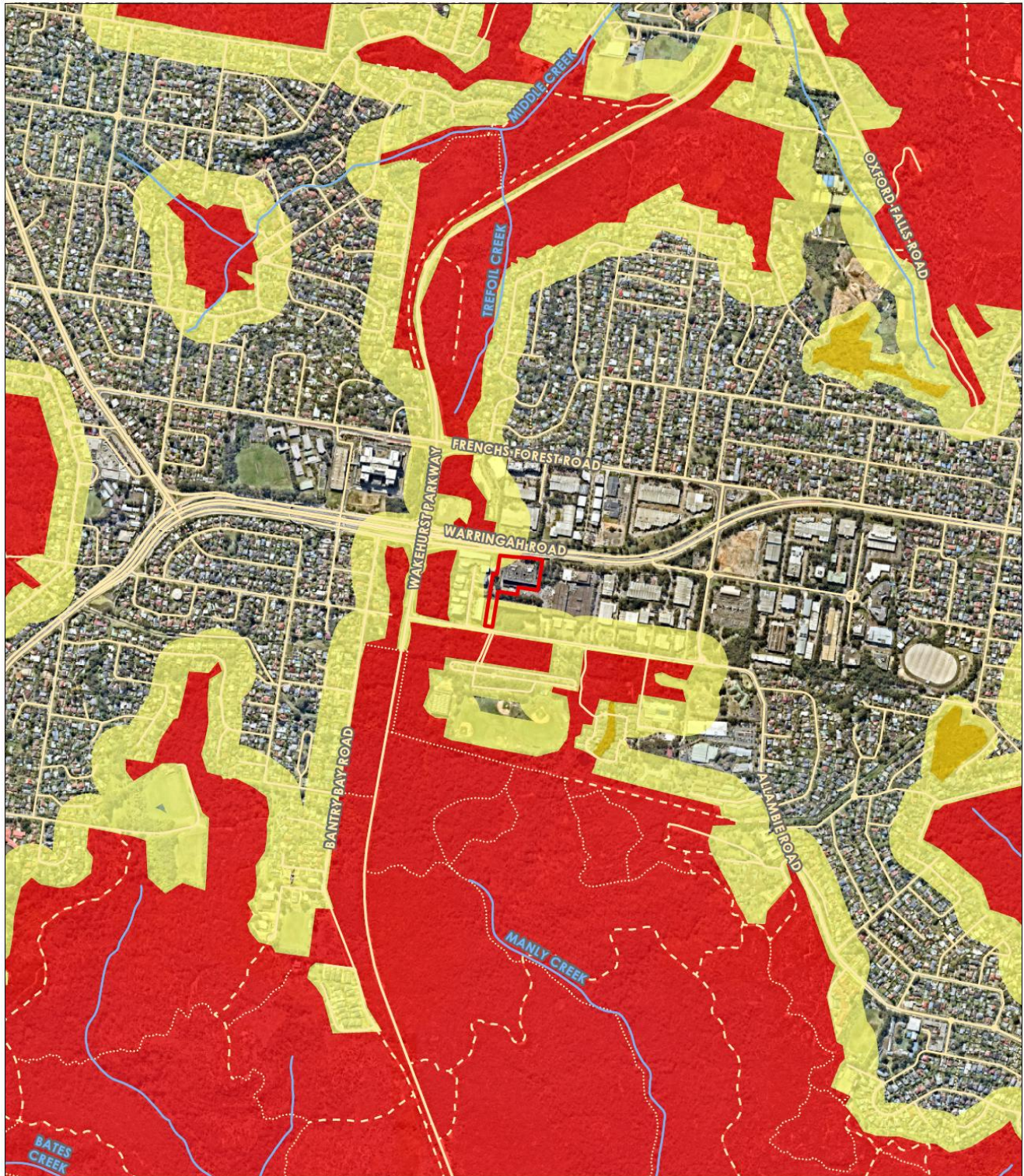
The general fire safety construction provisions (of the NCC) are taken as acceptable solutions, however construction requirements for bush fire protection will need to be considered on a case-by-case basis.

5. Bushfire Prone Land

Bushfire prone land maps provide a trigger for the development assessment provisions and consideration of sites that are bushfire prone.

Bushfire prone land (BFPL) is land that has been identified by council, which can support a bushfire or is subject to bushfire attack. Bushfire prone land maps are prepared by local council and certified by the Commissioner of the NSW RFS.

Figure 2 shows the Bushfire Prone Land Map for the site. The extract from the Northern Beaches Bushfire Prone Map shows that the site is impacted by the bushfire prone buffer in the south and northwest corner. Most of the site is not mapped as bush fire prone land.



Legend

-  Watercourse
-  Subject Land

Bushfire Prone Land

-  Vegetation Buffer
-  Vegetation Category 1
-  Vegetation Category 2



Date: 8/11/2022

0 250 500

Meters

Coordinate System: GDA 1994 MGA Zone 56

Imagery: © Nearmap

Figure 2: Bushfire Prone Land

6. The Proposal

The proposed development comprises construction of a three-storey industrial building (see Figure 3) including:

- 153 self-storage units at ground floor;
- 72 warehouse units on Levels 1 and 2;
- 123 car parking spaces across all levels;
- outdoor breakout spaces for staff at ground floor and Level 2;
- shared lobby across all levels;
- landscaping; and
- associated infrastructure/servicing works.

Approval is sought for 24/7 operation of the proposed self-storage and warehouse and distribution units.



7. Site Assessment Methodology

The Bushfire Assessment Report is based on an assessment of the site utilising the following resources:

- *Planning for Bushfire Protection* (NSW RFS, 2019);
- Aerial mapping; and
- Detailed GIS analysis.

The methodology used in this assessment is in accordance with PBP 2019 and is outlined in the following sections.

7.1. Bushfire Hazard

An assessment of the bushfire hazard is necessary to determine the application of bushfire protection measures such as Asset Protection Zone (APZ) locations and dimensions and future building levels.

The vegetation formations (bushfire fuels) and the topography (effective slope) combine to create the bushfire threat that may affect bushfire behaviour at the site and which determine the planning and building response of PBP 2019.

7.2. Fire Weather

The fire weather is dictated by PBP and assumes a credible worst-case scenario and an absence of any other mitigating factors relating to aspect or prevailing winds. The sites have a Fire Danger Index (FDI) of 100 as per PBP 2019.

7.3. Vegetation

Predominant Vegetation is classified by structure or formation using the system adopted by Keith (2004) and by the general description using PBP 2019. Vegetation types give rise to radiant heat and fire behaviour characteristics.

The predominant vegetation is determined over a distance of at least 140 metres in all directions from the proposed site boundary or building footprint on the development site. Where a mix of vegetation types exist, the type providing the greater hazard is said to predominate.

The land directly around the site is all developed, however there are forested areas to the northwest, west and south (see Figure 4).



Legend

- Watercourse
- Subject Land
- Cadastre
- Vegetation Assessment Buffer
- Vegetation Class**
 - Northern Hinterland Wet Sclerophyll Forests
 - Sydney Coastal Dry Sclerophyll Forests



Date: 17/04/2025

0 50 100
Meters

Coordinate System: GDA 1994 MGA Zone 56
Imagery: © Nearmap

Figure 5: Vegetation and Slope

7.4. Slopes Influencing Bushfire Behavior

The 'effective slope' influencing fire behaviour approaching the sites has been assessed in accordance with the methodology specified within PBP 2019. This is conducted by measuring the worst-case scenario slope where the vegetation occurs over a 100 metre transect measured outwards from the development boundary or the existing/ proposed buildings.

The slopes within the bushland areas range from level to 4.1 degrees downslope (Figure 5).

7.5. Asset Protection Zones

An Asset Protection Zone (APZ) is a buffer zone between a bushfire hazard and buildings. The APZ is managed progressively to minimise fuel loads and reduce potential radiant heat levels, flame, smoke and ember attack. The appropriate APZ distance is based on vegetation type, slope and the nature of the development.

The APZ can include roads or properties managed to be consistent with APZ standards set out in NSW RFS document *Standards for Asset Protection Zones*. The APZ provides a fuel-reduced, physical separation between buildings and bush fire hazards is a key element in the suite of bush fire measures and dictates the type of construction necessary to mitigate bushfire attack.

PBP 2019 requires APZs for commercial and industrial development to provide a defensible space and minimise material ignition.

PBP 2019 requires APZs for commercial and industrial development to provide a defensible space and minimises material ignition. Table 2 (below) provides a summary of the APZ for the proposed development. Figure 6 depicts the minimum APZ required across the site. No additional vegetation removal is considered required to achieve the APZ requirements.

Table 2: APZ Assessment.

Direction	Slope	Vegetation	Flame Zone Width	APZ Proposed
North	NA	No hazard	Nil	NA
East	NA	No hazard	Nil	NA
South	3.4° Downslope	Forest	22 metres	>100 metres
Southwest	4.1° Downslope	Forest	22 metres	>100 metres
West	2.9° Downslope	Forest	22 metres	>100 metres
Northwest	Level	Forest	18 metres	>60 metres

7.6. Bushfire Attack Levels

The Bushfire Attack Level (BAL) is a means of measuring the severity of a buildings or sites potential exposure to ember attack, radiant heat and direct flame contact. In the Building Code of Australia, the BAL is used as the basis for establishing the requirements for residential construction to improve protection of building elements.

The Bushfire Attack Levels to the site has been completed using the distances from the PBP 2019 Table A1.12.5 (Table 3). The BAL for the site is shown in Figure 7.

As "Other" development, the development must comply with objective 3 of PBP 2019 which requires that the development:

3. *Provide appropriate separation between a hazard and buildings, which, in combination with other measures, prevent the likely fire spread to buildings.*

Asset Protection Zones (see section 7.5) will be provided around the development that will include perimeter roads and hardstand areas. The buildings will be constructed to meet the relevant requirements of AS3959-2018 as identified in PBP 2019 and through the radiant heat modelling consistent with the methodology in PBP 2019.

Table 3 provides a summary of the BALs and Figure 7 depicts the BAL requirements across the site.

Table 3: Bushfire Attack Levels

Direction	Slope	Vegetation	APZ Proposed	Bushfire Attack Level
North	NA	No hazard	NA	See Figure 7*
East	NA	No hazard	NA	See Figure 7*
South	3.4° Downslope	Forest	>100 metres	See Figure 7*
Southwest	4.1° Downslope	Forest	>100 metres	See Figure 7*
West	2.9° Downslope	Forest	>100 metres	See Figure 7*
Northwest	Level	Forest	>60 metres	See Figure 7*

*Note: The extent of the BAL for the building is depicted in detail in Figure 7.



Legend

- Watercourse
- Contour - 2m
- Subject Land
- Cadastre
- Vegetation Assessment Buffer

Vegetation Class

- Asset Protection Zone (APZ)
- Northern Hinterland Wet Sclerophyll Forests
- Sydney Coastal Dry Sclerophyll Forests



Date: 17/04/2025

0 25 50

Meters

Coordinate System: GDA 1994 MGA Zone 56
Imagery: © Nearmap

Figure 6: Asset Protection Zones

7.6.1. Application of AS3959 (2018)

Construction must comply with the corresponding Bushfire Attack Level (BAL) as shown in Figure 7.

The application of each BAL is as defined on Figure 7 and not broadly applied across the entire elevation/building. The construction must comply with corresponding sections of the Australian Standard AS3959-2018 *Construction of buildings in bush fire-prone areas* or NASH Standard (1.7.14 updated) *National Standard Steel Framed Construction in Bushfire Areas – 2014* as appropriate, and Section 7.5 of *Planning for Bush Fire Protection 2019*.

The construction for the remainder of the proposed buildings not denoted with a BAL in Figure 7 is greater than 100 metres from any bushfire hazard. Consistent with AS3959, construction greater than 100 metres from a bushfire hazard is classified as BAL-Low. AS3959 describes BAL-Low as “*There is insufficient risk to warrant specific construction requirements*”. Therefore, the construction for the remainder of the proposed building not denoted with a BAL in Figure 7, is appropriately BAL-Low.

The construction of the buildings in this manner complies with *Planning for Bush Fire Protection 2019* and the National Construction Code (NCC). This policy position has been previously agreed by the NSW RFS on multiple occasions.

7.7. Water Supply and Utilities

PBP 2019 (p. 47) requires that adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.

Suitable water supply arrangements will be provided for firefighting that meet the NSW RFS requirements. A reticulated water supply for potable water supply and fire hydrants will be provided to the site. The fire-fighting water supply to the proposed buildings shall comply with the Building Code of Australia [BCA] and A.S. 2419.1 – 2005.



Legend

- Watercourse
- Contour - 2m
- Subject Land
- Cadastre
- Vegetation Assessment Buffer

Vegetation Class

- Northern Hinterland Wet Sclerophyll Forests
- Sydney Coastal Dry Sclerophyll Forests

Bushfire Attack Level (BAL)

- BAL - Flame Zone

- BAL - 40
- BAL - 29
- BAL - 19
- BAL - 12.5



DKGIS

Date: 17/04/2025

0 25 50

Meters

Coordinate System: GDA 1994 MGA Zone 56

Imagery: © Nearmap

Figure 7: Bushfire Attack Levels

7.8. Access

PBP 2019 requires that the design of access roads enables safe access and egress for people attempting to leave the area at the same time that emergency service personnel are arriving to undertake firefighting operations.

Vehicular access to the proposed warehouse will be provided via Aquatic Drive and an internal access road.

Aquatic Drive and the internal access will be constructed to provide heavy rigid and articulated vehicle access to the warehouse. This road network provides suitable access for fire-fighting appliances like NSW RFS Category 1 Tankers and Fire & Rescue NSW Composite and Aerial Appliances.

Given the low bushfire risk, lack of adjoining bushfire prone vegetation and comprehensive nature of the road design, access complies with the requirements of PBP 2019.

8. Assessment Against the Aim and Objective of PBP

All development in Bushfire Prone Areas needs to comply with the aim and objectives of PBP. Table 2 shows the compliance with PBP.

Table 2: Compliance with Aim & Objectives of PBP.

Aim	Meets Criteria	Comment
The aim of PBP is to use the NSW development assessment system to provide for the protection of human life (including fire fighters) and to minimise impacts on property from the threat of bushfire, while having due regard to development potential, onsite amenity and the protection of the environment.	Yes	Landscaping, defensible space, access and egress, emergency risk management and construction standards are in accordance with the requirements of PBP and the aims of PBP have been achieved.
Objectives	Meets Criteria	Comment
Afford occupants of any building adequate protection from exposure to a bushfire.	Yes	The development provides opportunity for all occupants to be shielded from any external bushfire. Construction will comply with the NCC.
Provide for a defensible space to be located around buildings.	Yes	Defensible space is provided around the building.
Provide appropriate separation between a hazard and buildings, which, in combination with other measures, prevent the likely fire spread to buildings.	Yes	The building is separated from the vegetated areas and provide APZs and commensurate construction in accordance with the NCC.
Ensure that safe operational access and egress for emergency service personnel and occupants is available.	Yes	The site has direct access to public roads, and access and egress for emergency vehicles and evacuation is adequate.
Provide for ongoing management and maintenance of bushfire protection measures.	Yes	The site will be managed by Goodman including all APZ and landscaping in accordance with PBP 2019.
Ensure that utility services are adequate to meet the needs of firefighters.	Yes	Utility services are adequate to meet the needs of firefighters (and others assisting in bushfire fighting).

The suite of bushfire protection measures provided for the proposed development satisfies the objectives for buildings of Class 5-8 under the NCC as identified in section 8.3.1 of PBP 2019.

9. Recommendations

The following recommendations are made to ensure the proposed building is provided with adequate bushfire protection in accordance with PBP:

Recommendation 1: The construction shall comply with the National Construction Code (2019), Australian Standard AS 3959:2018, *Construction of buildings in bush fire-prone areas* and/or NASH Standard (1.7.14 updated), *National Standard Steel Framed Construction in Bushfire Areas – 2014*, and Section 7.5 of *Planning for Bush Fire Protection 2019* on a prescriptive (deemed to satisfy and/or acceptable solution) basis and/or performance basis.

Recommendation 2: Fire hydrants are provided in accordance with Building Code of Australia E1.3, AS2419.1:2005, including the ring main requirements for large, isolated buildings and those identified in Section 7.7.

Recommendation 3: The entire site is to be maintained as an Inner Protection Area (IPA) in accordance with Appendix 4 of PBP 2019 and the NSW RFS “Asset protection zone standards”.

10. Conclusion

The Bushfire Hazard Assessment to support a Development Application for the proposed strata warehouse and storage at 14 Aquatic Drive, Frenchs Forest.

The proposed development is industrial development and considered as "other" development in *Planning for Bushfire Protection 2019* and complies with the aim and objectives of that document. This report demonstrates that the proposed development satisfies the requirements of *Planning for Bush Fire Protection 2019*, in particular the provision of asset protection zones, access and water supply for firefighting purposes.

The Building Code of Australia does not provide for any bushfire specific performance requirements for the proposed development and as such AS3959, 20018 does not apply as a deemed to satisfy provision.

This Bush Fire Hazard Assessment has detailed the proposed bush fire protection measures and demonstrates compliance with *Planning for Bush Fire Protection 2019*.



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Appendix 1: References

Australian Building Codes Board Building Code of Australia Volumes 1&2

Councils of Standards Australia AS3959 (2018) – Australian Standard Construction of buildings in bushfire-prone areas

Keith, David (2004) – Ocean Shores to Desert Dunes – The Native Vegetation of New South Wales and the ACT. The Department of Environment and Climate Change

NSW Rural Fire Service (2015) Guide for Bushfire Prone Land Mapping

NSW Rural Fire Service (NSW RFS). 2006. Planning for Bushfire Protection: A Guide for Councils, Planners, Fire Authorities, Developers and Home Owners. Australian Government Publishing Service, Canberra

NSW Rural Fire Service (NSW RFS). 2019. Planning for Bushfire Protection: A Guide for Councils, Planners, Fire Authorities, Developers and Home Owners.

NSW Government (1979) Environmental Planning and Assessment Act 1979. NSW Government Printer