

Planning for Bushfire Protection Pty Ltd



Ronald Coffey
0408 220 443
31 Collins Street North Narrabeen
Sydney NSW 2101
Email: ron.coffey@bigpond.com
Reference: 1497
6/09/2025

Subject:

Section 4.55 application for a variation to the approved development of a new secondary dwelling/granny flat at No 81 Palm Grove Road, Avalon.

Reference:

- Bushfire Risk Assessment: Reference 1018 dated 9/06/2017.
- DA Number: NO285/17, consent date 13/09/2017
- Consent Conditions: B4, C10 & C11 [Bushfire Mitigation Advice]
- Revised Plans Submitted by Sally Gardner Design and Draft.
- Reference Number 16-0407. Drawing No's A7-6-5-3. Dated 26/08/2025

Bushfire Risk Assessment: Reference 1018 dated 9/06/2017 was submitted by Planning for Bushfire Protection for the development of a new secondary dwelling/granny flat at No 81 Palm Grove Road, Avalon.

Approval for the proposed development included conditions referenced above [Bushfire Mitigation Advice]

A S4.55 application is proposed for amendments to the approved development.

The proposed amendments have been detailed in the revised plans referenced above

The proposed amendments include:

Extend balustrade to encompass DA approved deck area

- Extend balustrade to encompass the full DA approved deck area
- Install two (2) posts to enhance and support overhang
- Extend eastern wall of carport to close minor gap between carport and secondary dwelling
- Remove external carport stairs and utilise space for enclosed bin storage and hot water solar panel above
- Extend southern retaining wall of carport
- Install sloping access ramp from driveway to primary dwelling
- Repair concrete driveway

The recommendations listed in the bushfire risk assessment referred to above, were included for the bushfire protection measures for the proposed residential development of a new secondary dwelling/granny flat at No 81 Palm Grove Road, Avalon and were based on the relevant provisions of the NSW Rural Fire Service guideline entitled *Planning for Bushfire Protection 2006 [PBP 2006] and AS3959, 2009*.

AS3959, 2009 has been revised to AS3959, 2018, Planning for Bushfire Protection 2006 has been revised to PBP 2019, and the bushfire prone land map for the area has been revised. To

determine the category of bushfire attack for a site and subsequent required building standards, Table A1.12.5 of PBP replaces Table 2.4.2 of AS3959, 2009.

I have received a copy of revised plans for the proposed development. Based on the site assessment methodology and required building standard detailed in PBP 2019 and AS3959, 2018 I have determined that the conditions recommended in relation to bushfire mitigation measures are appropriate for the proposed variations to the development.

The following recommendations have been updated to conform to the revised Australian Standard AS3959 2018 and the revised provisions of PBP 2019.

- 1) Construction Standard: The proposed development shall be constructed to a minimum standard of Section 3 [construction general] and Section 5 [BAL 12.5] of AS3959, 2018 'Construction of Buildings in Bushfire Prone Areas' and Section A3.7 of the NSW Rural Fire Service Addendum to Appendix 3 of 'Planning for Bushfire Protection 2018'.
- 2) PBP 2019 - 8.3.2 Class 10a and 10b structures: *The NCC defines a Class 10 building as a non-habitable building or structure such as:*
 - a) *Class 10a – a non-habitable building being a private garage, carport, shed or the like; or*
 - b) *Class 10b – a structure being a fence, mast antenna, retaining wall or free-standing, swimming pool. Or the like; or*
 - c) *Class 10c – a private bushfire shelter.*

There is no bushfire protection requirement for Class 10a structures located more than 6m from a dwelling in bushfire areas. Where a Class 10a structure is located within 6m of a dwelling it must be constructed in accordance with the NCC.

There is no requirement for treated pine retaining walls in PBP 2019.
- 3) Fences and Gates: Fences and gates in bush fire prone areas may play a significant role in the vulnerability of structures during bush fires. In this regard, all fences in bush fire prone areas should be made of either hardwood or non-combustible material. However, in circumstances where the fence is within 6m of a building or in areas of BAL-29 or greater, they should be made of non-combustible material only.
- 4) Electricity and Gas Supplies: As far as practical, new electricity and gas supplies shall be installed in accordance with the requirements of 7.4a of PBP.
- 5) Existing Dwelling: The proposal does not include alterations, additions or modifications to the existing dwelling and this report does not include recommendations for the upgrading of the existing dwelling.
- 6) Asset Protection Zones: At the commencement of building works and in perpetuity, the entire property shall be managed as an inner protection area as outlined within PBP and the NSW RFS document 'Standards for asset protection zones.'
- 7) Emergency and Evacuation Planning: An emergency evacuation plan is not recommended as a condition of consent.
- 8) Water Supplies: Reticulated water supply is located on the adjoining road at regular intervals and is easily accessible. No additional water supplies have been recommended.

Notwithstanding the precautions adopted, it should always be remembered that bushfires burn under a wide range of conditions and an element of risk, no matter how small always remains, and although the standard is designed to improve the performance of such buildings, there can be no guarantee, because of the variable nature of bushfires, that any one building will withstand bushfire attack on every occasion.

This Report is a Bush Fire Hazard Assessment that provides the required information to assist Local Council and the Rural Fire Service in determining compliance in accordance with Planning for Bushfire Protection and AS 3959, 2019. The Local Council is the Final Consenting Authority, and the construction of the building must comply with the recommendations included in the Council's conditions of consent.



Ron Coffey – Bushfire Safety Engineer
Grad I Fire E [Institute of Fire Engineers - 1973]
Grad Cert Fire Safety Eng. [UWS - 2003]
Grad Dip Building in Bushfire Prone Areas [UWS – 2005]
Ass Prof Cert in Expert Evidence in the Land & Environment Court [UTS – 2005]
Member - Institute of Fire Engineers
Corporate Member - Fire Protection Association Australia



Planning for Bushfire Protection
Fire Protection Association of Australia
BPAD-A Certified Practitioner/Corporate Bronze Certified Business
Certification No BPD-PA09328
0408 220 443