

16 April 2025

Our ref: 23HUS4684

Johnstaff

Attention: Luke Brady

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Dear Luke,

**Gables New Primary School (Pennant Way Gables NSW 2765, 301//DP1287967) - RFS Bushfire Review**

Eco Logical Australia (ELA) have reviewed the NSW Rural Fire Service (RFS) recommendations issued 18 March 2025 (DA20250304000789-Original-1) and our comments are provided in Table 1 below.

**Table 1: RFS Recommendations**

| RFS Condition (DA20250304000789-Original-1)  | ELA Comment  |
|--|--|
| <p><b>General</b></p> <p>Prescriptive compliance with Specification 43 (sections S43C3, S43C4, S43C5, S43C6, S43C7, S43C8, S43C9, S43C12 and S43C13) is specified. Performance-based solutions proposed in lieu of compliance with the prescriptive provisions of Specification 43 (sections S43C3, S43C4, S43C5, S43C6, S43C7, S43C8, S43C9, S43C12 and S43C13 of NCC 2022) need to be assessed in accordance with the NCC 2022 by the Certifying Authority.</p> <p>Compliance with Specification 43 for S43C14 Vehicular access of NCC 2022 is modified by the RFS in response to the provision of a performance based solution provided through the document Bushfire Protection Assessment The Gables New Primary School School Infrastructure NSW (SINSW) on behalf of the NSW Department of Education (DoE), prepared by Eco Logical Australia, Ref: 23HUS4784, V2, dated 21 November 2024, which satisfied exclusion be granted from the requirements of S43C14 Vehicular access of NCC 2022, in accordance with Table 3 of Appendix B of Addendum 2022, of Planning for Bush Fire Protection 2019.</p> | <p>Noted – ELA understand a performance-based solutions will be assessed in accordance with the NCC 2022 by the Certifying Authority.</p> <p>Noted</p> |
| <p><b>Emergency and Evacuation Planning Assessment</b></p> <p><b>The intent of measures is to provide suitable emergency and evacuation arrangements for occupants of the development.</b></p> <p>1. In recognition of the isolated location of the proposed development a Bush Fire Emergency Management and Evacuation Plan (BEEP) must be prepared in accordance with Table 6.8d of Planning for Bush Fire Protection 2019 and be consistent with the following:</p> <ul style="list-style-type: none"> <li>The NSW RFS document: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan;</li> <li>include planning for the early relocation of occupants;</li> <li>detailed plans of all emergency assembly areas, including on-site and off-site arrangements as stated in AS 3745 'Planning for emergencies in facilities', are clearly displayed.</li> </ul>  | <p>No objection</p>  |

| RFS Condition (DA20250304000789-Original-1)   | ELA Comment   |
|---|---|
| A copy of the Bush Fire Emergency Management and Evacuation Plan should be provided to the Local Emergency Management Committee for its information prior to the occupation of the development.   |   |
| <b>Asset Protection Zones</b><br><b>Intent of measures is to provide suitable dwelling design, construction and sufficient space to ensure that radiant heat levels do not exceed critical limits for firefighters and other emergency services personnel undertaking operations, including supporting or evacuating occupants</b><br>2. At the commencement of building works and in perpetuity, the entire property must be managed as an asset protection zone in accordance with the requirements of Appendix 4 of <i>Planning for Bush Fire Protection 2019</i> .  | No objection  |
| <b>Construction Standards</b><br><b>The intent of SFPP measures is to provide suitable dwelling design, construction and sufficient space to ensure that radiant heat levels do not exceed critical limits for firefighters and other emergency services personnel undertaking operations, including supporting or evacuating occupants.</b><br>3. New construction must comply with Sections 3 and 6 (BAL 19) 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.<br><br>4. Fences and gates must comply with Section 7.6 of Planning for Bush Fire Protection 2019. New fences and gates are to be made of either hardwood or non-combustible material. Where a fence or gate is constructed within 6m of a dwelling or in areas of BAL-29 or greater, they must be made of non-combustible material only.  | No objection – however, condition should be amended to current NASH version being, <i>NASH Standard for Steel Framed Construction in Bushfire Areas 2021 (NS300)</i> .<br><br>Note: NASH is not an acceptable solution under Table 2 of Planning for Bush Fire Protection Addendum 2022 however, it is understood RFS are open to its use.<br><br>No objection – however, condition should read <i>where a fence or gate is constructed within 6m of a school building or in areas.....</i> |
| <b>Access - Internal Roads</b><br><b>The intent of measures is to provide safe operational access for emergency services personnel in suppressing a bush fire while residents are accessing or egressing an area.</b><br>5. The performance criteria for Special Fire Protection Purposes Class 9 access have been demonstrated and are achieved through the development complying with the document PROPOSED SITE PLAN - SINSW Gables New Primary School - Lot 301 - Fontana Drive, The Gables (Box Hill North), prepared by Architectus, Project No. 210463.01, Rev A.06, dated 3 February 2024.  | No objection  |
| <b>Water and Utility Services</b><br><b>The intent of measure is to provide 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.</b><br>6. The provision of water, electricity and gas must comply with the following in accordance with Table 6.8c of Planning for Bush Fire Protection 2019: <ul style="list-style-type: none"> <li>reticulated water is to be provided to the development where available;</li> <li>fire hydrant, spacing, design and sizing complies with the relevant clauses of Australian Standard AS 2419;</li> <li>hydrants are and not located within any road carriageway;</li> <li>reticulated water supply to urban subdivisions uses a ring main system for areas with perimeter roads;</li> <li>fire hydrant flows and pressures comply with the relevant clauses of AS 2419;</li> <li>all above-ground water service pipes are metal, including and up to any taps;</li> <li>where practicable, electrical transmission lines are underground;</li> <li>where overhead, electrical transmission lines are proposed as follows:</li> </ul> | No objection  |

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| <ul style="list-style-type: none"> <li>○ lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas; and</li> <li>○ no part of a tree is closer to a power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines.</li> <li>● reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used;</li> <li>● reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 - The storage and handling of LP Gas, the requirements of relevant authorities, and metal piping is used;</li> <li>● all fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side;</li> <li>● connections to and from gas cylinders are metal; polymer-sheathed flexible gas supply lines are not used; and</li> <li>● above-ground gas service pipes are metal, including and up to any outlets.</li> </ul>  |              |
| <p><b>Landscaping Assessment</b></p> <p><b>The intent of measures is to provide suitable dwelling design, construction and sufficient space to ensure that radiant heat levels do not exceed critical limits for firefighters and other emergency services personnel undertaking operations, including supporting or evacuating occupants</b></p> <p>7. Landscaping within the required asset protection zone shall comply with Appendix 4 of Planning for Bush Fire Protection 2019. In this regard, the following principles are to be incorporated:</p> <ul style="list-style-type: none"> <li>● A minimum 1 metre wide area (or to the property boundary where the setbacks are less than 1 metre), suitable for pedestrian traffic, must be provided around the immediate curtilage of the building;</li> <li>● Planting is limited in the immediate vicinity of the building;</li> <li>● Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters);</li> <li>● Landscape species are chosen to ensure tree canopy cover is less than 15% (IPA), and less than 30% (OPA) at maturity and trees do no touch or overhang buildings;</li> <li>● Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies;</li> <li>● Use smooth bark species of trees species which generally do not carry a fire up the bark into the crown;</li> <li>● Avoid planting of deciduous species that may increase fuel at surface/ ground level (i.e. leaf litter);</li> <li>● Avoid climbing species to walls and pergolas;</li> <li>● Locate combustible materials such as woodchips/mulch, flammable fuel stores away from the building;</li> <li>● Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from the building; and</li> <li>● Low flammability vegetation species are used.</li> </ul> | No objection |

Regards,



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