



Bushfire Assessment

In relation to

Proposed Window Replacements

House of Ullr

8 Mowamba Place

Thredbo



Department of Planning
and Environment

Issued under the Environmental Planning and Assessment Act 1979

Approved Application No DA 22/16334

Granted on the 28 April 2023

Signed A Bautista

Sheet No 7 of 8

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1. Introduction

The proposed development involves alterations to the existing ski lodge known as House of Ullr. The alterations simply involve the replacement of the existing timber framed single glazed windows with new double glazed aluminium framed windows.

The subject land is identified as bushfire prone, Category 1 vegetation as is the entire village of Thredbo.

Section 100B of the *Rural Fires Act 1997* provides that, where development involves a *special fire protection purpose* (including tourist accommodation), a permit is required under Section 100B. Clause 44 of the Rural Fires Regulation 2013 contains the matters that must be included in an application for a Bushfire Safety Authority. This assessment addresses the relevant points as listed in Clause 44 of the Rural Fires Regulation in relation to the matters that must be included in an application for a Bushfire Safety Authority.

An extract of the bushfire prone lands map for the site is provided below:



Figure 1: Extract of Bushfire Prone Land Map [Source: NSW Planning Portal]

2. Description of the Site

2.1 Site Details

The following data is provided in relation to the site:

Title Description	Lot 815 DP 1119757
Property Address	8 Mowamba Place, Thredbo
Site Area	760.6m ²
Zoning – Snowy River LEP 2013	C1 – National Parks and Nature Reserve
Alpine Resort Area – SEPP (Precincts – Regional) 2021	Thredbo Alpine Resort

The subject site is located on the southern side of the Mowamba Place at the intersection with Bobuck Lane. The subject site is shown in its local context in Figures 1 and 2.

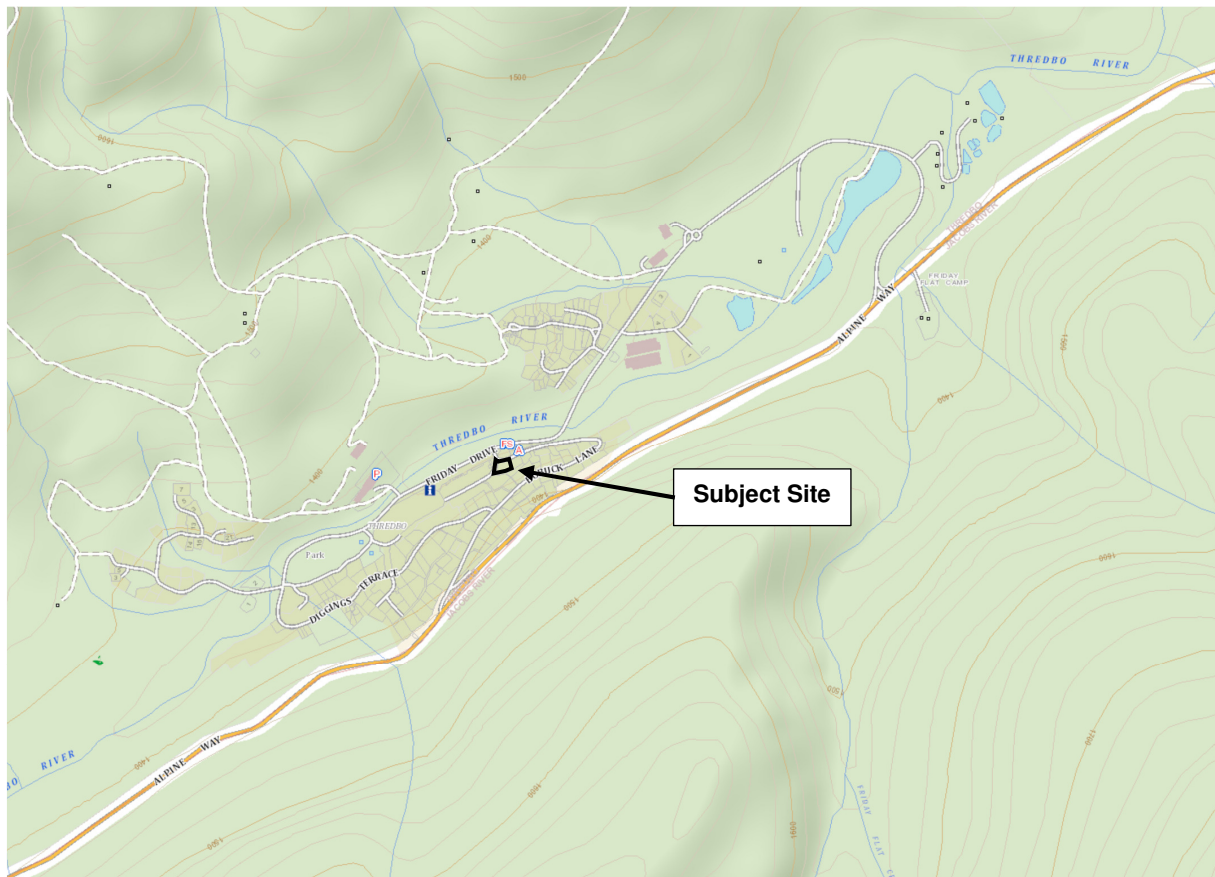


Figure 1 – Location of Site (Topographic)

[Source: SIX Maps]



Figure 3 - Site Locality Plan (Satellite)

[Source: NearMaps]

The following photographs of the site are provided.



House of Ullr – North Elevation



House of Ullr – West Elevation



House of Ullr – Southern and Eastern Elevations



Forest Vegetation to North (opposite side of Friday Drive)



Developed/Managed Land to East



Developed/Managed Land to South



Developed/Managed Land to West

3. Classification of Vegetation

The vegetation existing on the subject land is comprised of developed/managed land containing hard paved areas and small garden areas. The vegetation within 140 metres of the site is generally comprised of similarly developed land other than the vegetation within the open space/ski fields to the north.

The vegetation in each direction from the site development area is as follows:

Direction	Vegetation Description	Classification PBP 2019
North	Sclerophyll Forest	Forest
East	Residential and Commercial Properties	Managed Land
South	Residential and Commercial Properties	Managed Land
West	Residential and Commercial Properties	Managed Land

4. Assessment of the Slope of the Land

The subject land is located on a south facing slope in the valley of the Thredbo River. The areas containing the forest vegetation to the north are located on the north facing slope on the opposite side of the valley and have an effective slope of *flat/upslope*.

5. Any Significant Environmental Features

There are no significant environmental features identified on the land. The site is located in the Thredbo Village area within Kosciusko National Park.

6. Any Threatened Species

The site is cleared and managed and no impact to vegetation or habitats is proposed for the works.

7. Any Aboriginal Relics

The land is cleared and disturbed land. An AHIMS Search did not identify any Aboriginal Sites or Places on the land or adjacent areas.

8. Bushfire Assessment

A. The extent to which the development is to provide for setbacks including Asset Protection Zones

The site is located within the NSW Alpine Area and is subject to an FDI rating of 50.

Based upon the classification of vegetation and slope, the following Asset Protection Zones are required according to the provisions of Table A1.12.1 of *Planning for Bush Fire Protection* 2019.

Direction	Vegetation	Effective Slope	Required APZ
North	Forest	Flat/upslope	67m
East	Managed Land	Flat/upslope	N/A
South	Managed Land	Flat/upslope	N/A
West	Managed Land	Flat/upslope	N/A

The separation distance between the forest vegetation in the north and the existing building is comprised of managed land within developed properties, roads and managed grassland areas creating a separation distance of at least 50m which performs equivalent to an APZ.

B. The siting and adequacy of water supplies for fire fighting

In terms of water supply for firefighting, the area is provided with reticulated supply fire hydrants (pillars) are provided in the street system.

C. The capacity of public roads to handle increased volumes of traffic in the event of a bushfire emergency

The site has direct frontage to Mowamba Place and Bobuck Lane which a narrow access lanes established in the village. The roads are unable to handle large volumes of traffic but have short connections to Friday Drive which has large capacity and connects with Alpine Way in both directions.

- D. Whether or not public roads in the vicinity have two-way access
Mowamba Place is designated two way and Bobuck Lane and one-way. Two-way access is limited on the roads. Friday Drive which is the key perimeter road between the Bushfire Threat Vegetation and the property is wide and provides large capacity with two-way access available.
- E. The adequacy of arrangements for access to and egress from the development site for the purposes of an emergency response
Vehicle access within the site is limited to a small parking/drop off area from Mowamba Place.
- F. The adequacy of bushfire maintenance plans and fire emergency procedures for the development site
The lodge has existing emergency management plans, which are updated periodically as required.
- G. The construction requirements to be used for building elements in the development
The building is existing and would be subject to a BAL 12.5 based on slope and separation from unmanaged vegetation
- H. The adequacy of sprinkler systems and other fire protection measures to be incorporated into the development
There is no proposal to install any sprinkler system or other fire protection measures as part of the proposed development to address bushfire attack. Some measures are proposed to meet BCA requirements for fire separation and protection of openings.

9. Compliance with Planning for Bush Fire Protection

The details provided in this Assessment outline the relationship between the development and the requirements set out in *Planning for Bush Fire Protection* 2019.

Clauses 6.4 and 6.5 deal with development within existing Special Fire Protection Premises. Of special note is clause 6.5 which includes provisions in relation to minor alterations to existing buildings like this and states:

6.5 Minor development in SFPP facilities

Minor development includes the following:

- *Internal works;*
- *Flag poles;*
- *Aerials and antennas;*
- *Satellite dishes;*
- *Paved areas;*
- *Earth works and draining;*
- *Class 10a structures located further than 6m from a habitable building; and*
- *Minor non-structural building alterations (external).*
 - *painting, plastering, cement rendering, cladding, attaching fittings or decorative work;*
 - *the replacement of an external window, glazing areas or a door (however, the opening and/ or external glazed area of the window or door must not be increased in size);*
 - *the repair to or replacement of a non-structural wall or roof cladding;*
 - *the installation of a security screen or grill to a door or window or a security door;*
 - *the repair to or replacement of a balustrade; and*
 - *re-stumping or repairing structure foundations without increasing the height of the structure.*

The development types listed above do not have any influence on potential bush fire impacts and the bush fire protection of the building. For this reason, the NSW RFS does not consider that a BFSA is necessary for the development types listed above. Wherever applicable, the building elements concerned will need to comply with the requirements of AS 3959 or NASH Standard under the NCC.

The proposal involves the replacement of external windows and doors and does not increase the area of any openings (some are reduced in area). The proposed windows will be installed to meet the requirements of BAL 12.5 under AS 3959 which will significantly improve the performance of the building in terms of resistance to ember attack.

In addition, clause 6.6 of *Planning for Bushfire Protection 2019* provides specific objectives for development in Alpine Resorts. These specific objectives are

provided within the table below, along with a discussion of how the objectives are met for the proposal:

Clause 6.6 Objective	Comment
<i>provide an appropriate defensible space;</i>	A large defensible space exists between the existing building and the unmanaged vegetation, including the Friday Flat Perimeter Road
<i>provide a better bush fire protection outcome for existing structures (e.g., via ember protection measures);</i>	The proposal significantly improves ember protection with new aluminium windows and screens.
<i>ensure new building work complies with the construction standards set out in AS 3959;</i>	The new windows will be compliant with AS 3959.
<i>to ensure ongoing management and maintenance responsibilities are in place where APZs are proposed outside of the sub lease or leasehold area;</i>	The separation distance between the vegetation and site is contained within public roads, leased areas and areas mapped as Asset Protection Zone on the Thredbo Bushfire Preparation Map.
<i>written consent from the land managers is provided for all proposed works outside of the sub lease or leasehold area;</i>	The proposal does not involve any works and lands outside the Ullr site.
<i>proposed APZs outside of the sub lease or leasehold area are supported by a suitable legal mechanism to ensure APZs are managed under a binding legal agreement in perpetuity;</i>	Not Applicable
<i>ensure building design and construction standards enhance the chances of occupant and building survival; and</i>	The proposed windows improve performance of the existing construction.
<i>provide safe emergency evacuation procedures.</i>	The proposal will not impact on existing evacuation procedures.

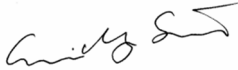
The new windows will improve the bushfire resilience for the building and are considered to meet the relevant aims and objectives for *Planning for Bushfire Protection*.

10. Conclusion

The proposed development involves minor building alterations through the replacement of existing timber windows with double glazed aluminium windows.

The windows will provide protection greater than the applicable BAL 12.5 requirements and will improve resilience of the existing building.

The proposal will result in improve bushfire performance consistent with the objectives for Alpine Resorts within *Planning for Bushfire Protection 2019*.



GAVIN MABERLY-SMITH

NOTE AND DISCLAIMER:

1. *This assessment has been based entirely on the requirements of Clause 44 of the Rural Fires Regulation 2013 and the bushfire protection guidelines as outlined in Planning for Bushfire Protection 2019 (PBP).*
2. *As noted by PBP, notwithstanding the precautions adopted, it should always be remembered that bushfires burn under a range of conditions and an element of risk, no matter how small, always remains.*
3. *This assessment has not considered any ecological or other planning considerations that would be considered in determining any Development Application.*

REFERENCES

NSW Rural Fire Service (2019)
Planning for Bush Fire Protection