

BUSHFIRE ASSESSMENT REPORT

PROPOSED ALTERATIONS & ADDITIONS

Lot 1 DP 1085253 No. 6 Pipit Place Perisher Valley, 2624

> 27 February 2025 Reference: S024012





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The assessment has been prepared in accordance with Planning for Bushfire Protection - A Guide for Councils, Planners, Fire Authorities and Developers, 2019, NSW Rural Fire Service (RFS) and Planning NSW.

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1 INTRODUCTION

This Bushfire Assessment Report has been prepared to support a development application for proposed repairs to Snowgums Lodge located at No. 6 Pipit Place, Perisher Valley and is legally described as Lot 1 DP 1085253. For this assessment, the proposal is considered to be, by virtue of Section 4.46 of the Environmental Planning and Assessment (EP&A) Act 1979, integrated development and requires a Bush Fire Safety Authority under Section 100B of the Rural Fires Act 1997 in respect of bush safety for the development of land for a special fire protection purpose (that being tourist and visitor accommodation). The Bushfire Assessment Report has been prepared in accordance with Clause 45 of the Rural Fires Regulation 2022, which specifies the information requirements for consideration of a bush fire safety authority under section 100B of the RF Act 1997. Snowy Monaro Regional Council's Bushfire Prone Land Map indicates that the subject site is bushfire prone (Figure 1). For the purposes of this assessment, the subject development is considered "infill development" in accordance with the PBP 2019. A development application for infill development in a bushfire prone area is required to be assessed by the relevant consent authority under section 4.14 of the Environmental Planning and Assessment Act 1979.



Figure 1: Snowy Monaro Regional Council's Bushfire Prone Land Mapping.



The assessment of the site is based on the results of a desktop assessment and field survey. The following current legislation and guidelines were referred to when preparing this report:

- Planning for Bushfire Protection, A Guide for Council, Planner, Fire Authorities and Developers' (NSW Rural Fire Service (RFS) in cooperation with the Department of Planning (2019);
- Rural Fires Act 1997;
- Australian Standard 3959-2018 Construction of Buildings in Bushfire Prone Areas; and
- Rural Fires Regulation 2022.

NOTE: that the 'Planning for Bushfire Protection, A Guide for Council, Planners, Fire Authorities, and Developers (NSW Rural Fire Service (RFS) in cooperation with the Department of Planning (NSW) (2019)' mentioned above, will herein be referred to as the **'PBP 2019'**.

1.1 OBJECTIVES

All development on Bushfire Prone Land must satisfy the aim and objectives of PBP 2019. PBP 2019 states:

"The aim of PBP is to provide for the protection of human life and minimise impacts on property from the threat of bush fire, while having due regard to development potential, site characteristics and protection of the environment.

More specifically, the objectives are to:

- a) afford buildings and their occupants protection from exposure to a bush fire;
- *b)* provide for a defendable space to be located around buildings;
- c) provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings;
- d) ensure that appropriate operational access and egress for emergency service personnel and occupants is available;
- e) provide for ongoing management and maintenance of BPMs; and
- f) ensure that utility services are adequate to meet the needs of firefighters

Proposals for infill development are to:

- a) provide a defendable space to enable unimpeded access for firefighting around the building;
- b) provide better bush fire outcomes on a redevelopment site than currently exists, commensurate with the scale of works proposed;
- c) design and construct buildings commensurate with the bush fire risk;
- d) provide access, services and landscaping to aid firefighting operations;
- e) not impose an increased bush fire management and maintenance responsibility on adjoining land owners; and
- f) increase the level of bush fire protection to existing dwellings based on the scale of the proposed work and level of bush fire risk.

This assessment includes an analysis of the potential hazard persisting and affecting the subject site and the standards and bushfire mitigation measures that should be introduced to address the objectives of the PBP 2019 and AS3959-2018. The mitigation measures have been derived from the provisions (performance criteria and acceptable solutions) as outlined within the PBP 2019 and AS3959-2018.



1.2 PROPOSAL

The proposal is for additions to the established ski lodged, including:

- Replacement roof metal;
- Replacement gutters and downpipes;
- Repair timber eaves;
- External painting to match existing; and
- Replace insulation.

Figure 2 shows an extract of the Roof Plan prepared by *Vitale Design* which has been submitted as part of this application. Materials have been included in the submitted Architectural Plans including custom orb Shale Grey metal roof sheeting, metal gutters and downpipes, and paint to match existing. There are no physical works proposed. Access for works is via Pipit Place.



Figure 2: Extract of the Roof Plan prepared by Vitale Design.



Figure 3: Elevation Plan prepared by Vitale Design.



2 PROPERTY DETAILS

2.1 DESCRIPTION OF PROPERTY

The subject lot is described as Lot 1 DP 1085253, No. 6 Pipit Place, Perisher Valley (Figure 3 and Figure 4). Perisher Valley is a town Located in the Snowy Monaro Regional Council, the valley is the site of one of four resort bases of the Perisher Ski Resort, which also comprises Guthega, Blue Cow and Smiggin Holes. It is located within the Kosciuszko National Park between Jindabyne and Charlotte Pass on the Kosciuszko Road. Access to the valley is via Skitube, Alpine Railway or by road. Although it is primarily a winter only resort village, year-round accommodation is available, including tours, and bush walks. It is situated about 492km south-southwest of Sydney, the state capital, and 211km south of Canberra.



Figure 4: Locality map of the subject site in relation to its surroundings.





Figure 5: Aerial photo of the subject site highlighted in blue.

Vegetation forming a bushfire threat to the proposed development comes from grassy woodland located west of the subject site and alpine complex (heath) located east of the subject site. Topographically, the site falls to the east.

2.2 CLASS OF VEGETATION

The vegetation types have been classified using the formations and sub-formations provided in Figure A1.2 of the bushfire guideline. Vegetation descriptions are as per Keith D, 2004 in Keith (2004) "Ocean Shores to Desert Dunes" published by DECC (except heathlands which is provided two sub-formations rather than one based largely on vegetation height) the main categories are as follows:

- Forests (wet sclerophyll forests and dry sclerophyll forests);
- Woodlands;
- Forested wetlands;
- Tall heaths;
- Freshwater wetlands;
- Short heaths;
- Alpine complex;
- Semi-arid woodlands;
- Arid shrublands;
- Rainforests; and
- Grasslands.



Fuel loads are based on recent information provided by:

- The University of Wollongong's (UoW) Fuels Modelling Project;
- The University of Melbourne (UoM) which reference the fuel classifications found in Keith (2004); and
- CSIRO Ecosystems Sciences and Bushfire Dynamics and Applications.

Where a mix of vegetation types exist, the type providing the greatest bushfire hazard has been used. Vegetation that is to be cleared as part of the development has not been included in this assessment. It should also be noted that remnant vegetation (a parcel of vegetation < 1 ha or fire run of < 50m) and Riparian vegetation are considered a low hazard and APZ setbacks and building construction standards for these will be the same as required for rainforest vegetation.

The following are not required to be considered a bushfire threat for the purposes of PBP, as detailed below:

- Single areas of vegetation less than 1 hectare in area and greater than 100 metres separation from other areas of Category 1 or 2 vegetation.
- Multiple areas of vegetation less than 0.25 hectares in area and not within 20m of the site, or each other or of other areas of vegetation being classified vegetation.
- Strips of vegetation less than 20 metres in width (measured perpendicular to the elevation exposed to the strip of vegetation) regardless of length and not within 20m of the site or 2 each other, or other areas of vegetation being Category 1, 2 or 3 vegetation.
- Vegetation regarded as low threat due to factors such as flammability, moisture content or fuel load, including grassland managed in a minimal fuel condition, mangroves and other saline wetlands, maintained lawns, golf courses such as playing areas and fairways, maintained public reserves and parklands, sporting fields, vineyards, orchards, banana plantations, market gardens and other non-curing crops, cultivated gardens, arboretums, commercial nurseries, nature strips and windbreaks.

Note: 1. Minimal fuel condition means there is insufficient fuel available to significantly increase the severity of the bush fire attack (recognizable as short cropped grass for example, to a nominal height of 100 mm). 2. A windbreak is considered a single row of planted trees located on a boundary and used as a screen or to reduce the effect of wind on the leeward side of the trees.

• Existing areas of managed gardens and lawns within curtilage of buildings. Non-vegetated areas, including waterways, roads, footpaths, buildings, and rocky outcrops.

The details of the predominant vegetation in all directions, to a distance of 140m from the subject site are provided in **3.2**. Vegetation forming a bushfire threat to the proposed development comes from sub-alpine woodland located west of the subject site and alpine complex (heath) located east of the subject site. It is noted that several adjoining properties contain existing cabin, infrastructure, and access roads which are classified as managed land for the assessment.

However, in accordance with Planning for Bushfire Protection (PBP 2019), the sub-alpine woodland would be classified as forest.





Figure 6: Extract of the Bushfire Threat Assessment Plan.

2.3 ASSESSMENT OF SLOPE

The slope in all directions over a distance of 100m from the existing property boundary or building footprint has been assessed in terms of the following classes:

- (i) all upslope vegetation (considered 0°)
- (ii) >0 to 5° downslope vegetation
- (iii) >5 to 10° downslope vegetation
- (iv) >10 to 15° downslope vegetation
- (v) >15 to 18° downslope vegetation.

During the assessment of the slope, if it was found that there were a number of different slope classes present over the 140m in any one direction, the slope of the area, which will most significantly influence the fire behavior, has been adopted. Planning for Bushfire Protection 2019 acknowledges that there may be varying slopes and, in this regard, the "gradient within the hazard (vegetation) which will most significantly influence the fire behaviour of the site having regard to the vegetation found" can be used.

The slopes most significantly influencing bushfire behaviour are as follows:

- South Upslope;
- East 15 to 20° Downslope; and
- West Upslope.



2.4 SIGNIFICANT ENVIRONMENTAL FEATURES

There are no known significant environmental features found on the site.

2.5 THREATENED SPECIES

There are no known threatened species located on the subject land.

2.6 ABORIGINAL RELICS

There are no known aboriginal relics located on the subject land.

2.7 ZONING

The site is subject to the provisions of Snowy Monaro Regional (Perisher Valley) Council LEP 2012, under which it is zoned a mix of **C1 National Parks and Nature Reserves** (Figure 6).



Figure 7: Snowy Monaro Regional Council LEP zoning, subject site highlighted in blue.

3 PROPERTIES ADEQUACY FOR BUSHFIRE PROTECTION

3.1 ASSESSMENT METHODOLOGY

A site inspection was conducted to determine the direction and scale of any potential bush fire event based on an analysis of slope, aspect, vegetation type and density, current fuel loading and evidence of past fire history.

The information contained in the appendices of the PBP 2019 has been used to categorise vegetation type and slope class in the locality, as discussed in Sections 2.2 and 2.3 of this report. Section A1.6 of the PBP 2019 was used to determine the appropriate fire area and corresponding FDI rating. Following on from this, Table A1.12.1 of PBP 2019 was used to determine APZs for each respective vegetation class and the bushfire exposure level (construction requirements) for the existing Snowgum Lodge.



3.2 SPECIFICATIONS FOR ASSET PROTECTION ZONE

The aim of APZs is to ensure that there is a progressive reduction in flammable material towards any building. In relation to Special Fire Protection Developments the intent of the measures are to provide sufficient space for fire-fighters and other emergency services personnel, ensuring radiant heat levels permit operations under critical conditions of radiant heat, smoke and embers, while supporting or evacuating occupants. The acceptable solution is for the APZ to be determined in accordance with Table A1.12.1 of Planning for Bushfire Protection 2019. The performance criteria and acceptable solutions for asset protection zones for Special Fire Protection Developments in accordance with PBP 20019 are provided in Table 1.

Table 1: Provides the performance criteria and acceptable solutions for APZ for residential development in accordance with PBP 2019.

Performance Criteria	Acceptable Solutions	Compliance
The intent may be achieved where:		
Radiant heat levels of greater than 10kW/m ² (calculated at 1200K) experienced on any part of the building.	• An APZ is provided in accordance with Table A1.12.1 of Appendix 1 of PBP 2019.	The subject site will continue to be managed as APZ, it is noted that several adjoining properties contain existing cabins and infrastructure, which are classified as managed land for the assessment. The proposed development is unable to achieve the
		required Asset Protection Zone (APZ) in accordance with Table A1.12.1 of Appendix 1 of PBP 2019. Instead, the proposal adopts a performance-based assessment to achieve an improved bushfire resilience outcome.
APZ maintenance is practical, soil stability is not compromised and the potential for crown fires is minimised.	 APZs are located on lands with a slope less than 18 degrees. 	The subject site does not have slopes greater than 18 degrees.
APZs are managed and maintained to prevent the spread of fire to the building. APZ is provided in perpetuity.	 The APZ is managed in accordance with the requirements of Appendix 4 of this document, and is wholly within the boundaries of the development site; APZ are wholly within the boundaries of the development site; and other structures located within the APZ need to be located further than 6m from the refuge building. 	The APZs on the subject site should have no problem being maintained in accordance with the requirements of Standards for Asset Protection Zones.



Table 2 provides a breakdown of the vegetation type, slope class and the required APZ for the proposed development. The APZs have been calculated for the Snowy Monaro Rural region using a FFDI of 50 (Alpine Area – Perisher Valley). The distance for the asset protection zone/separation distance has been measured in accordance with Table A1.12.1 PBP 2019 (Determination of BAL, FFDI 50 – Alpine Areas) which is between each of the vegetation stands identified (from the edge of the foliage cover) and the building. The separation distances have been measured onsite using a Nikon Forestry Pro Range Finder and Clinometer.

Table 2: Breakdown of the vegetation type, slope class and the recommended APZ in accordance with Table A1.12.1 ofPBP 2019.

Direction	Dominant Vegetation Type	Effective Bushfire Slope	APZ Required (m)	Minimum Recommended APZ (m)	BAL	Comments
South	Forest	Upslope	67m	To the Boundary	BAL-FZ	APZ established. Continued maintenance recommended.
East	Alpine Complex (Heath)	15 to 20° Downslope	49m	To the Boundary	BAL-FZ	APZ contained within subject site and managed portion of Pipit Place.
West	Forest	Upslope	67m	To the Boundary	BAL-FZ	APZ established. Continued maintenance recommended.

3.3 ASSESSING THE BUSHFIRE RISK

The main factors directly affecting the behavior of fire are:

- Wind (strength and direction);
- Fuel Moisture and content (how dry it is, relative humidity);
- Type quantity and arrangement of fuel (vegetation density); and
- Slope (fire spreads quicker upslope due to preheating).

The prevailing weather conditions associated with the bushfire season in the Snowy Monaro (Perisher Valley) region are cool temperate. Winters are long and cold, with temperatures regularly falling below freezing and periodic snowfalls occurring through the region. Due to the Monaro's location (lee of the Snowy Mountains) a rain shadow effect is experienced throughout the region, creating low and irregular annual rainfall. Rain falls predominantly in summer and winter, with a slight summer dominance. The bush fire season generally runs from October to March. In some years, good summer rains, drier than normal autumn conditions, severe winter frosts and gale force winds have created a further fire danger period throughout the winter months.

With the combination of the vegetation (post development) and slope, the overall bushfire risk, based on radiant heat exposure, associated with the proposed development is **Extreme.** Significant radiant heat and significant higher likelihood of flame contact from the fire front will threaten building integrity and result in significant risk to residents.



The existing managed land within the subject lot shall continue to be maintained (no additional clearing is required) as an Inner Protection Area - IPA (Figure 10) for the life of the development and comply with section 7.4 and Appendix 4 of Planning for Bush Fire Protection 2019 and the NSW Rural Fire Service's document 'Standards for asset protection zones', as outlined below:

<u>Trees</u>

- tree canopy cover should be less than 15% at maturity;
- trees at maturity should not touch or overhang the building;
- lower limbs should be removed up to a height of 2m above the ground;
- tree canopies should be separated by 2 to 5m; and
- preference should be given to smooth barked and evergreen trees.

<u>Shrubs</u>

- create large discontinuities or gaps in the vegetation to slow down or break the progress of fire towards buildings should be provided;
- shrubs should not be located under trees;
- shrubs should not form more than 10% ground cover; and
- clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation.

<u>Grass</u>

- grass should be kept mown (as a guide grass should be kept to no more than 100mm in height); and
- leaves and vegetation debris should be removed.



Figure 8: Diagrammatic representation of an Asset Protection Zone.



3.4 CONSTRUCTION STANDARDS

The construction standards and associated performance criteria for infill development require that the proposed building can withstand bushfire attack in the form of wind, smoke, embers, radiant heat and flame contact. Section 3.3 of PBP 2019 requires that the construction standards be determined in accordance with AS3959 or NASH Standards.

It needs to be recognised that a building with any facade identified as requiring a construction level must build all facades to at least BAL-12.5. Where more than one facade is exposed to a hazard, then the facade with the highest construction requirement is used to determine the appropriate level of construction. All other facades may be reduced by one level of construction unless that facade is also subject to the same bush fire attack level.

Recommendations

It is acknowledged that the proposed works will not increase the building footprint or the available occupancy of the facility. The works are limited to the repair and maintenance of the existing lodge, ensuring its continued functionality and safety.

Given the location and nature of the proposed works, the bushfire behaviour exposure level has been assessed as BAL-FZ (Bushfire Attack Level – Flame Zone). However, consistent with the principles outlined in *Planning for Bush Fire Protection 2019* (Section 7.8), a holistic approach to bushfire resilience is considered. Section 7.8 of *Planning for Bush Fire Protection 2019* highlights the importance of achieving improved bushfire resilience through a performance-based approach rather than relying solely on prescriptive requirements. It acknowledges that strict compliance with Bushfire Attack Level (BAL) construction standards may not always be the most effective solution, particularly in infill developments or modifications to existing buildings. Overall, Section 7.8 encourages flexibility in bushfire planning by allowing innovative solutions that prioritise safety while considering practical, structural, and environmental constraints.

To enhance the building's resilience to ember attack, radiant heat, and potential flame contact, the proposal includes the replacement of existing materials with BAL-29 compliant materials, supplemented by targeted ember protection upgrades where required. This approach aligns with best practices in bushfire management, improving the overall safety of the structure while balancing regulatory compliance with a more appropriate bushfire mitigation strategy.

Therefore, the proposed works shall be constructed to comply with a Bushfire Attack Level of 29 (BAL 29).

- New external works shall comply with section 3 and section 7 (**BAL 29**) Australian Standard AS3959-2018 Construction of buildings in bush fire-prone area or NASH Standard (1.7.14 updated) National Standard Steel Framed Construction in Bushfire Areas 2014 as appropriate and as amended by section 7.5 of Planning for Bush Fire Protection 2019.
- The lodge shall be upgraded (if and where required) to improve ember protection, unless already constructed to a relevant standard. This is to be achieved by enclosing all openings (excluding roof tile spaces) or covering openings with a non-corrosive metal screen mesh with a maximum aperture of 2mm. Where applicable, this includes any sub floor areas, openable windows, vents, weepholes, and eaves. External doors are to be fitted with draft excluders.



The specific construction requirements for **BAL 29** are provided in Australian Standard AS3959-2018 'Construction of buildings in bush fire-prone areas'. In addition to the construction requirements in AS3959-2018, section 7.5 of 'Planning for Bush Fire Protection 2019' sets out additional construction requirements for development within NSW.

3.5 SITING AND ADEQUACY OF WATER ELECTRICITY AND GAS SUPPLIES

The performance criteria and acceptable solutions for water, electricity, and gas for special fire protection purposes in accordance with PBP 2019 are provided in Table 3. The intent of the measures are to provide adequate water services 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 buildings.

Table 3: Provides the performance criteria and acceptable solutions for water, electricity, and gas for SFPP development in accordance with PBP 2019.

	PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS	Compliance
	 an adequate water supply for firefighting purposes is installed and maintained. 	 reticulated water is to be provided to the development, where available; or a 10,000 litres minimum static water supply for firefighting purposes is provided for each occupied building where no reticulated water is available. 	Lodge is existing. Water supply to comply.
	VARIATIONS		
PLIES	 Caravan and camping grounds: an adequate water supply for firefighting purposes is installed and maintained. Primitive camping: an adequate water supply for firefighting purposes is installed and maintained. 	 either a reticulated water supply is provided or a 10,000 litres minimum water supply on site. 	N/A
WATER SUP	 Water supplies are located at water supplies are located at regular intervals. the water supply is accessible and reliable for firefighting operations. 	 fire hydrant spacing, design and sizing comply with the relevant clauses of AS 2419.1:2005; hydrants are not located within any road carriageway; and reticulated water supply to SFPPs uses a ring main system for areas with perimeter roads. 	Lodge is existing. Water supply to comply.
	 flows and pressure are appropriate. 	 fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2005. 	N/A
	 the integrity of the water supply is maintained. 	 all above-ground water service pipes external to the building are metal, including and up to any taps. 	All above-ground water service pipes external to the building shall be metal, including and up to any taps.
	 water supplies are adequate in areas where reticulated water is not available. 	 a connection for firefighting purposes is located within the IPA or non hazard side and away from the structure; a 65mm Storz outlet with a ball valve is fitted to the outlet; 	Static water supply shall be designed to comply with the acceptable solution.



	PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS	Compliance
		 ball valve and pipes are adequate for water flow and are metal; supply pipes from tank to ball valve have the same bore size to ensure flow volume; underground tanks have an access hole of 200mm to allow tankers to refill direct from the tank; a hardened ground surface for truck access is supplied within 4m of the access hole; above-ground tanks are manufactured from concrete or metal; raised tanks have their stands constructed from non-combustible material or bush fire-resisting timber (see Appendix F AS 3959); unobstructed access is provided at all times; tanks on the hazard side of a building are provided with adequate shielding for the protection of firefighters; and underground tanks are clearly marked, all exposed water pipes external to the building are metal, including any fittings; where pumps are provided, they are a minimum 5hp or 3kW petrol or diesel-powered pump, and are shielded against bush fire attack; Any hose and reel for firefighting connected to the pump shall be 19mm internal diameter; and fire hose reels are constructed in accordance with AS/NZS 1221:1997 <i>Fire hose reels</i>, and installed in accordance with the relevant clauses of AS 2441:2005 <i>Installation of fire hose reels</i>. 	
ELECTRICITY SERVICES	 location of electricity services limits the possibility of ignition of surrounding bush land or the fabric of buildings. 	 where practicable, electrical transmission lines are underground; where overhead, electrical transmission lines are proposed as follow: lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas; and 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. 	The area is serviced by existing electrical transmission lines. The augmentation of this service should have no problem complying with the acceptable solutions.



	PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS	Compliance
GAS SERVICES	 location and design of gas services will not lead to ignition of surrounding bushland or the fabric of buildings. 	 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; all fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side; connections to and from gas cylinders are metal; if gas cylinders need to be kept close to the building, safety valves are directed away from the building and at least 2m away from any combustible material, so they do not act as a catalyst to combustion; polymer sheathed flexible gas supply lines to gas meters adjacent to buildings are not to be used; and above-ground gas service pipes external to the building are metal, including and up to any outlets. 	Lodge is existing. Gas to comply. Any future gas bottles shall be installed and maintained in accordance with AS 1596. Gas cylinders are to be positioned in accordance with the acceptable solution outlined in this table. From the site inspection there is no reason why the installation of gas cylinders cannot comply with the acceptable solution outlined in this table.

3.6 ADEQUACY OF ACCESS AND EGRESS FROM SITE FOR EMERGENCY RESPONSE

The intent of measures is to provide safe access to/from the public road system for firefighters providing property protection during a bush fire and for occupants faced with evacuation. In relation to this development the performance criteria and acceptable solutions for Property Access Roads in sections 6.8.2 (Table 6.8b) of PBP 2019 are the relevant requirements. An assessment of the proposed development against these requirements is provided in Table 4.

Table 4: Provides the performance criteria and acceptable solutions for Property Access Roads for SFPP Development in accordance with section 6.8.2 (Table 6.8b) of PBP 2019.



PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS	Compliance
VARIATIONS		•
- Primitive camping: Firefighting vehicles are provided with safe, all- weather access to structures and hazard vegetation.	 access is provided in accordance with the property access requirements of Table 5.3b. 	N/A
 Bed and breakfast and farmstay: Firefighting vehicles are provided with safe, all- weather access to structures. 	 access is provided in accordance with the property access requirements of Table 5.3b. 	
 Ecotourism: fire fighting vehicles are provided with safe, all-weather access to the proposed refuge building. 	 venicular access is provided to the refuge building from a public road in accordance with property access requirements of Table 5.3b; accommodation is within 100m of the refuge building; and pedestrian paths from accommodation to the refuge building/s are provided and clearly signposted. 	
 the capacity of access roads is adequate for firefighting vehicles. 	 the capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes); bridges and causeways are to clearly indicate load rating. 	Access exists and is provided by public roads.
 there is appropriate access to water supply. 	 hydrants are located outside of parking reserves and road carriageways to ensure accessibility to reticulated water for fire suppression; hydrants are provided in accordance with the relevant clauses of AS 2419.1:2005; and there is suitable access for a Category 1 fire appliances to within 4m of the static water supply where no reticulated supply is available. 	Lodge is existing.

3.7 ADEQUACY OF BUSHFIRE MAINTENANCE PLANS OR EMERGENCY

Snowy Monaro Rural Fire District (11 Geebung St, Polo Flat NSW 2630) currently administers bushfire maintenance plans and fire emergency procedures in this particular area. Additionally, Fire and Rescue NSW Perisher Valley Fire Station is located at No. Kosciuszko Rd, Perisher Valley NSW 2624 which is approximately 2 minutes' drive.

Legislation requires occupants of land to immediately extinguish fires or notify fire-fighting authorities, on becoming aware of fire during fire danger period. The most appropriate course of action is to telephone "000" and report the fire.

The intent of measures is to provide suitable emergency and evacuation arrangements for occupants of Special Fire Protection Purposed Developments. The performance criteria and acceptable solutions for emergency management are detailed in Section 6.8.4 of Planning for Bushfire Protection 2019 which are detailed in Table 5 below.



Table 5: Performance criteria and acceptable solutions for emergency management plans for SFPP development.

Performance Criteria	Acceptable Solutions	Compliance
a Bush Fire Emergency	- Bush Fire Emergency Management and	As the subject development site will
Management and Evacuation	Evacuation Plan is prepared consistent	be centrally managed and maintained,
Plan is prepared.	with the:	the application and implementation of
	 The NSW RFS document: A Guide to 	a fire emergency plan and a bushfire
	Developing a Bush Fire Emergency	maintenance plan could be reasonably
	Management and Evacuation Plan;	managed and undertaken as part of
	 NSW RFS Schools Program Guide; 	the subject development sites
	 Australian Standard AS 3745:2010 	operations and ongoing activities.
	Planning for emergencies in	Therefore, in the author's opinion a
	<i>facilities</i> ; and	site-specific Bush Fire Emergency
	 Australian Standard AS 4083:2010 	Management Plan is required.
	Planning for emergencies – Health	
	care facilities (where applicable).	
	- The Bush Fire Emergency Management	
	and Evacuation Plan should include	
	planning for the early relocation of	
	occupants.	
	Note: 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 occupation of the	
	development.	
appropriate and adequate	- An Emergency Planning Committee is	This can be implemented if not
management arrangements are	established to consult with residents	already in place.
established for consultation and	(and their families in the case of aged	
implementation of the Bush Fire	care accommodation and schools) and	
Emergency Management and	staff in developing and implementing	
Evacuation Plan.	an Emergency Procedures Manual; and	
	- Detailed plans of all emergency	
	assembly areas including on site and	
	off-site arrangements as stated in AS	
	3745:2010 are clearly displayed, and an	
	annually emergency evacuation is	
	conducted.	



3.8 LANDSCAPING

The performance criteria is for landscaping to be designed and managed to minimise flame contact and radiant heat to buildings, and the potential for wind driven embers to cause ignitions. The general principles of landscaping for bushfire protection aim to:

- Prevent flame impingement;
- Provide a defendable space for property protection;
- Reduce fire spread;
- Deflect and filter embers;
- Provide shelter from radiant heat; and
- Reduce wind speed".

It is recommended that any future landscaping be designed and maintained in accordance with the following practices:

- maintaining a clear area of low cut lawn or pavement adjacent buildings;
- keeping areas under fences, fence posts and gates and trees raked and cleared of fuel;
- utilising non-combustible fencing and retaining walls;
- breaking up the canopy of trees and shrubs with defined garden beds;
- organic mulch should not be used in bushfire prone areas and non-flammable material should be used as ground cover, e.g. Scoria, pebbles, recycled crushed bricks.
- planting trees and shrubs such that:
 - the branches will not overhang the roof; and
 - the tree canopy is not continuous.

3.9 PBP 2019 OVERALL OBJECTIVE ASSESSMENT

All development on Bushfire Prone Land must satisfy the aims and objectives of PBP 2019. Table 6 demonstrates how the proposal complies with the overall objectives of PBP 2019.

PBP 2019 Overall Objective	Assessment / Comment		
Afford buildings and their occupants protection from exposure to bushfire.	Where the recommendations stated by this report are reasonably and adequately incorporated (where practicable), occupants remaining within the subject development site during a significant bushfire event would be afforded the benefit bushfire protection 'measures in combination'. In this respect, fire fighters or occupants remaining within the subject development site or else defending an asset or building during a passing bushfire event should reasonably be better afforded an acceptable level of protection.		
Provide for a defendable space to be located around buildings.	Where the recommendation relating to APZ management as stated by this report is reasonably and adequately incorporated, all building structures would be afforded a reasonable area of defendable space (complying APZ) within the subject development site.		
Provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely spread to buildings.	Where the recommendations relating to construction standards & APZ area stated by this report are reasonably and adequately incorporated the proposal would reasonably be able to avoid direct flame contact and material ignition.		
Ensure that safe operational access and egress for emergency service personnel and residents is available.	Where the recommendation relating to internal roadway installation and maintenance as stated by this report is reasonably and adequately incorporated, both emergency services personnel and occupants		



PBP 2019 Overall Objective	Assessment / Comment		
	should be afforded safe access / egress within the subject development site for firefighting or evacuation purposes.		
Provide for ongoing management and maintenance of bushfire protection measures (BPM).	Where the recommendations relating to construction standards and APZ area stated by this report are reasonably and adequately incorporated, it would be reasonable to assume that regular maintenance works within the subject development would ensure ongoing management and maintenance of bush fire protection measures.		
	Should the standard or upkeep of APZ areas, vegetation maintenance or vehicle access (required for bushfire safety compliance) become compromised during the life of the subject development site, it would also be reasonable to assume such matters would be addressed by the Council or local Fire Authorities through their hazard mitigation policies and notifications.		
Ensure that utility services are adequate to meet the needs of firefighters.	Where the installation or connection to electrical and gas services incorporates the recommendations as stated by this report, both emergency services personnel or occupants assisting in bush firefighting should safely be able to manage potential electrical and gas hazards associated during a bushfire event.		

4 CONCLUSIONS AND RECOMMENDATIONS

This Bushfire Assessment Report has been prepared to support a development application for proposed alterations and additions located at No. 6 Pipit Place, Perisher Valley and is legally described as Lot 1 DP 1085253.

Perisher Valley is a town Located in the Snowy Monaro Regional Council, the valley is the site of one of four resort bases of the Perisher Ski Resort, which also comprises Guthega, Blue Cow and Smiggin Holes. It is located within the Kosciuszko National Park between Jindabyne and Charlotte Pass on the Kosciuszko Road. Access to the valley is via Skitube, Alpine Railway or by road. Although it is primarily a winter only resort village, year-round accommodation is available, including tours, and bush walks. It is situated about 492km south-southwest of Sydney, the state capital, and 211km south of Canberra.

Vegetation forming a bushfire threat to the proposed development comes from sub-alpine woodland located west of the subject site and alpine complex (heath) located east of the subject site. Topographically, the site falls to the east.

Given the location and nature of the proposed works, the bushfire behaviour exposure level has been assessed as BAL-FZ (Bushfire Attack Level – Flame Zone). However, consistent with the principles outlined in *Planning for Bush Fire Protection 2019* (Section 7.8), a holistic approach to bushfire resilience is considered. Section 7.8 of *Planning for Bush Fire Protection 2019* highlights the importance of achieving improved bushfire resilience through a performance-based approach rather than relying solely on prescriptive requirements. It acknowledges that strict compliance with Bushfire Attack Level (BAL) construction standards may not always be the most effective solution, particularly in infill developments or modifications to existing buildings. Overall, Section 7.8 encourages flexibility



in bushfire planning by allowing innovative solutions that prioritise safety while considering practical, structural, and environmental constraints.

To enhance the building's resilience to ember attack, radiant heat, and potential flame contact, the proposal includes the replacement of existing materials with BAL-29 compliant materials, supplemented by targeted ember protection upgrades where required. This approach aligns with best practices in bushfire management, improving the overall safety of the structure while balancing regulatory compliance with a more appropriate bushfire mitigation strategy.

In our professional opinion, the replacement of existing materials with BAL-29 compliant materials, combined with upgrades to ember protection measures where required, will significantly enhance the bushfire resilience of the development. These upgrades will provide a safer outcome by reducing the structure's vulnerability to ember attack, radiant heat, and potential flame contact, aligning with best practices in bushfire management and improving overall compliance with relevant bushfire safety standards.

The following combination of mitigation measures are recommended to provide an appropriate level of safety for occupants of the dwelling and a level consistent with that required by PBP 2019:

Asset Protection Zones

1. The existing managed land shall continue to be maintained as an IPA for the life of the development and comply with section 6 and Appendix 4 of Planning for Bush Fire Protection 2019 and the NSW Rural Fire Service's document 'Standards for asset protection zones'.

Landscaping

- 2. Any future landscaping shall be designed and maintained in accordance with the following practices:
 - a. maintaining a clear area of low cut lawn or pavement adjacent to the house;
 - b. keeping areas under fences, fence posts and gates and trees raked and cleared of fuel;
 - c. utilising non-combustible fencing and retaining walls;
 - d. breaking up the canopy of trees and shrubs with defined garden beds;
 - e. organic mulch should not be used in bushfire prone areas and non-flammable material should be used as ground cover, e.g. Scoria, pebbles, recycled crushed bricks.
 - f. planting trees and shrubs such that:
 - i. the branches will not overhang the roof; and
 - ii. the tree canopy is not continuous.

Construction Requirements

- New external works shall comply with section 3 and section 7 (BAL 29) Australian Standard AS3959-2018 Construction of buildings in bush fire-prone area or NASH Standard (1.7.14 updated) National Standard Steel Framed Construction in Bushfire Areas – 2014 as appropriate and as amended by section 7.5 of Planning for Bush Fire Protection 2019.
- 4. All The lodge shall be upgraded (if and where required) to improve ember protection, unless already constructed to a relevant standard. This is to be achieved by enclosing all openings (excluding roof tile spaces) or covering openings with a non-corrosive metal screen mesh with a maximum aperture of 2mm. Where applicable, this includes any sub floor areas, openable windows, vents, weepholes, and eaves. External doors are to be fitted with draft excluders.



Services

5. The provision of water, electricity, and gas services to comply with the following in accordance with Table 6.8c of *Planning for Bush Fire Protection 2019*.

Emergency Planning

6. A site-specific Bush Fire Emergency Management Plan is required to be prepared in accordance with NSW RFS document: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; Australian Standard AS 3745:2010 Planning for emergencies in facilities; and Australian Standard AS 4083:2010 Planning for emergencies – Health care facilities (where applicable).

If the proposed works are undertaken in accordance with the recommendations outlined in this report it will comply with performance requirements provided in *Planning for Bushfire Protection* (2019) and will provide adequate provision for firefighting strategies. Compliance with the overall performance requirements of Clause 45 of the Rural Fires Regulation 2022 is provided in Table 8.

Bushfire Protection Measure	Compliance	
Asset Protection Zone	Yes - Refer to Sections 3.2 and 3.3.	
The siting and adequacy of water supplies for fire fighting	YES - Refer to Sections 3.5.	
Capacity of public roads to handle increased volumes of traffic in	Not applicable	
the event of a bushfire emergency		
Whether or not public roads in the vicinity that link with the fire trail	Not applicable.	
network have two-way access		
Adequacy of emergency response access and egress	YES - Refer to Section 3.6.	
Adequacy of bushfire maintenance plans and fire emergency	YES - Refer to Sections 3.7.	
procedures		
Building construction standards	YES - Refer to Sections 3.4.	
Adequacy of sprinkler systems and other fire protection measures	No sprinkler systems proposed.	
to be incorporated into the development		

 Table 7: Compliance with the performance requirements of Clause 45 of the Rural Fires Regulation 2022.

The validity of this Bushfire Assessment Report extends for a duration of twelve months, concluding in February 2026. The report will retain its validity provided it is submitted within this twelve-month timeframe and will continue to be in force until the Development Application (DA) is finalised. Should the twelve-month period lapse without lodgement to the relevant consent authority, the Bushfire Report shall undergo a review to incorporate any changes in legislation, alterations in land use, and shifts in vegetation patterns. Additionally, any significant bushfire incidents impacting the designated site will prompt a review to assess the efficacy of protective measures and annual hazard reduction activities.

The findings contained within this report are the result of discrete/specific methodologies used in accordance with recognised practices. To the best of our knowledge they represent a reasonable interpretation of the general conditions of the site. However, having stated this, it is important to note that although designing dwelling to have an improved level of fire resistance will increase the likelihood of survival in a bushfire, their survival and that of the occupants cannot be guaranteed and therefore the decision whether to *stay* or *go* should be based on an understanding that the adoption of solutions outlined in this report will not guarantee safety.





SITE PLANS





LOCATION PLAN

DRAWING SCHEDULE

DWG NO.	DRAWING NAME
DA00	COVER SHEET
DA01	SITE PLAN
DA02	ROOF PLAN
DA03	GROUND FLOOR PLAN
DA04	FIRST FLOOR PLAN
DA05	WEST ELEVATION
DA06	NORTH ELEVATION
DA07	EAST ELEVATION
DA08	South elevation
DA09	SECTION A
DA10	NEIGHBOUR NOTIFICATION PLAN

SNOWGUMS SKI LODGE

FINISHES SCHEDULE

ITEM/LOCATION	DESCRIPTION
Roof	Replace roof with Custom Orb - Shale Grey
Gutters + Downpipes	Colorbond metal - colour to match existing
Eaves	Repair rotten timber eaves, paint - colour to match existing
Exterior surfaces	Painting - colour to match existing

SCOPE

•	Rep	olace	roo	of with	Custom	Orb -	Shale	Grey,	replace	metal	gutters +	downpipes
	-											

- Replace insulation
- Repair rotten timber eaves
- Scaffold to perimeter legs / stauntions will be placed on wide rubber or timber pad
- Painting exterior surfaces colour to match existing • All building materials in skip bin and removed from site
- No disruption to trees or vegetation

Do not scale from this drawing.
Contractors to take and check all dimensions on site prior to work commencing. Any discrepancies to be reported to designer.

Subcontractors to verify all dimensions on site before making shop drawings

r commencing manufacture.

issue А

FOR DA

description

date

SNOWGUMS SKI LODGE 6 PIPIT PLACE PERISHER VALLEY NSW 2624 LOT 1 DP 1085253

project

VITALE

VITALE DESIGN

6 / 1 Dune Walk Woolooware Bay NSW 2230

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27.08.24



6 PIPIT PLACE, PERISHER VALLEY

FOR DEVELOPMENT APPLICATION

AUGUST 2024

PREPARED FOR

SNOWGUMS SKI LODGE

design BV drawn RCP scale

job No. SNOW_24/1 NTS

title **COVER SHEET**



issue No.

А

KEY CODE FINISH MR Replac Replace existing roof with Colorbond metal roof sheeting, gutters + downpipes, colour to match existing



SITE PLAN 1:200

notes

Do not scale from this drawing. Contractors to take and check all dimensions on site prior to work commencing. Any discrepancies to be reported to designer. Subcontractors to verify all dimensions on site before making shop drawings or commencing manufacture.

description FOR DA

issue

А

date project

27.08.24

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north



design					
drawn					
job No.					
scale					

ΒV RCP SNOW_24/1 1:200 @ A3

title SITE PLAN



issue No. А





notes

Do not scale from this drawing. Contractors to take and check all dimensions on site prior to work commencing. Any discrepancies to be reported to designer. Subcontractors to verify all dimensions on site before making shap drawings or commencing manufacture.

description issue FOR DA

А

date 27.08.24

project

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north

design BV drawn RCP

job No. SNOW_24/1 scale 1:100 @ A3

title **ROOF PLAN**



issue No. А

CODE FINISH

MR Replace roof with Custom Orb - Shale Grey, replace metal gutters + downpipes, repair eaves, colour to match existing

ΡT Painting exterior surfaces - colour to match existing



WEST ELEVATION 1:100

notes Do not scale from this drawing. Contractors to take and check all dimensions on site prior to work commencing. Any discrepancies to be reported to designer. Subcontractors to verify all dimensions on site before making shop drawings or commencing manufacture. issue description А

FOR DA

date

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SNOWGUMS SKI LODGE 6 PIPIT PLACE PERISHER VALLEY NSW 2624 LOT 1 DP 1085253

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job No. SNOW_24/1 1:100 @ A3

title WEST ELEVATION



issue No.



CODE FINISH

MR Replace roof with Custom Orb - Shale Grey, replace metal gutters + downpipes, repair eaves, colour to match existing

ΡT Painting exterior surfaces - colour to match existing



NORTH ELEVATION 1:100





job No. SNOW_24/1 1:100 @ A3

title NORTH ELEVATION



issue No.



CODE FINISH

MR Replace roof with Custom Orb - Shale Grey, replace metal gutters + downpipes, repair eaves, colour to match existing

ΡT Painting exterior surfaces - colour to match existing



EAST ELEVATION 1:100

notes Do not scale from this drawing. Contractors to take and check all dimensions on site prior to work commencing. Any discrepancies to be reported to designer. Subcontractors to verify all dimensions on site before making shop drawings or commencing manufacture.

issue А

description FOR DA

date

27.08.24

project

SNOWGUMS SKI LODGE 6 PIPIT PLACE PERISHER VALLEY NSW 2624 LOT 1 DP 1085253 VITALE

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design BV drawn RCP scale

job No. SNOW_24/1 1:100 @ A3

title EAST ELEVATION



issue No.

А

CODE FINISH

MR Replace roof with Custom Orb - Shale Grey, replace metal gutters + downpipes, repair eaves, colour to match existing

ΡT Painting exterior surfaces - colour to match existing





notes



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design BV drawn RCP scale

job No. SNOW_24/1 1:100 @ A3

title SOUTH ELEVATION



issue No.



CODE FINISH

MR Replace roof with Custom Orb - Shale Grey, replace metal gutters + downpipes, repair eaves, colour to match existing

ΡT Painting exterior surfaces - colour to match existing

SCOPE

- Replace roof with Custom Orb Shale Grey, replace metal gutters + downpipes
- Replace insulation Repair rotten timber eaves
- Scaffold to perimeter legs / stauntions will be placed on wide rubber or timber pad
- Painting exterior surfaces colour to match existing
- All building materials in skip bin and removed from site
- No disruption to trees or vegetation



325 WEST ELEVATION 270 NORTH ELEVATION EAST ELEVATION SOUTH ELEVATION

SITE PLAN

notes

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description FOR DA

issue

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date

27.08.24

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design BV drawn RCP scale

job No. SNOW_24/1 NTS

NEIGHBOUR NOTIFICATION PLAN



issue No.





BUSHFIRE THREAT ASSESSMENT PLAN



Liability limited by a Scheme approved under Professional Standards Legislation



Bushfire Threat Assessment

Lot 1 DP 1085253 No. 6 Pipit Place Perisher Valley, 2624

Мар Кеу

Subject Site Lot - Snowy Monaro 100m_Buffer 140m_Buffer Alpine Complex (Heath) Managed Land Sub-Alpine Woodland (Forest) Slope Analysis

E	3
C	3

		SET Ref:	S024012
		Ammendments	Date
Drawn	JD	Ver 0.1	26/11/2024
Checked			

Notes:

Assessment in accordance with Planning for Bushfire Protection 2019

No dimensions or exact positions have been surveyed

Contours based on currently available elevation data (NSW Spatial Data - DEM, Dated 22/05/2017)

Projection: GDA 94 - MGA55