



Building Code & Bushfire Hazard Solutions

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Mirvac
Level 28, 200 George Street
SYDNEY NSW 2000

21st April 2020
Our Ref. 140990

Attn: Amanda Blake – Senior Development Manager

**Re: PLANNING PROPOSAL – 1/2018/PLP
LOT 61 DP 737386 / 55 COONARA AVENUE, WEST PENNANT HILLS NSW 2125
BUSHFIRE ASSESSMENT – Response to Department of Planning, Industry and Environment**

Dear Amanda,

It is understood that the Department of Planning, Industry and Environment (DPIE) is seeking clarification on various aspects of the proposal. Specifically we understand that you would like us to respond to the following item:

Area 6b adjoins proposed higher rise buildings. We appreciate that the intent of the APZ is to manage vegetation and retain canopy trees that would form part of and function as a Powerful Owl nest buffer. RFS noted in its submission on the proposal that greater asset protection zones may be required for high rise buildings. We agreed that before the Department's officers made a final recommendation to the delegate on the interpretation of EES advice for the zoning plan, you would confirm the scale and nature of the APZs in this location with your bushfire consultant.

Firstly it is important to note that the extent of the proposed E2: Environmental Conservation in the site will remain absent of any future Asset Protection Zone (APZ) as this is not consistent with the zone objective.

We are confident the APZs shown in the submission documents for this application are sufficient to address compliance with Planning for Bush Fire Protection and subsequently satisfy the NSW Rural Fire Service. If larger APZs are required they would occur within the proposed R3: Medium Density Residential or R4: High Density Residential zoned land.

In relation to the nature of the APZs Planning for Bush Fire Protection 2019 requires the following within an Inner Protection Area:

Trees

*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.*

Shrubs

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.

Grass

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.

The intent of the 'managed land' is to be an area where the surface, near surface and elevated fuels are reduced / maintained, however a higher canopy percentage from that permitted within an APZ. This managed will slow the progression of a bushfire within the adjacent Forest area.

Should you have any further questions please do not hesitate in contacting myself.

Prepared by
Building Code & Bushfire Hazard Solutions P/L

**Stuart McMonnies**

Manager Bushfire Section
G. D. Design in Bushfire Prone Areas.
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