



Building Code & Bushfire Hazard Solutions

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8th July 2013
Our Ref. 120973

Attention: Helen Monks
By Email: info@highlightconsulting.com.au

**Re: PROPOSED RESIDENTIAL SUBDIVISION
Lot 3912 & Lot 416 MARANA ROAD, SPRINGFIELD
ADDITIONAL INFORMATION**

Dear Helen

With reference to the request for me to address questions raised from the NSW Rural Fire Service and the proposed subdivision of Lot 3912 and Lot 416 on the northern side of Marana Road I provide the following comment.

The RFS response states:

"The following will need to be provided for further assessment:

1. The Bushfire Assessment Report prepared by Building Code & Bushfire Hazard Solutions referenced 120973 and dated 4th October 2012, indicates no dwellings are proposed which are greater than BAL-29 however the recommendations indicate no dwellings are proposed beyond BAL-40. 'Planning for bush fire protection 2006' does not allow proposed dwellings beyond the construction standard of BAL-29. Further clarification is required as to the highest radiant heat level expected for each dwelling accompanied with modelling sheets.

The NSW RFS are well aware that there is currently an anomaly between Planning for Bush Fire Protection 2006 (PBP) Appendix 2 requirements for subdivisions and PBP Appendix 3 Construction Levels and I have several development applications where it has been necessary to clarify proposals that provide an appropriate setback to meet the required 29Kw/m² requirement under Appendix 2 PBP 2006. This can sometimes result in a building footprint being within a BAL 40 determination when assessed under Appendix 3 of PBP 2006, and there are numerous examples of approvals of such applications that the RFS can rely upon that reflect this position. This included simple subdivision applications, large development release areas and large multi unit residential flat buildings (which are treated as a subdivision).

I would like to also highlight that my report does not reference that "*no dwellings are proposed which are greater than BAL-29*" as quoted by the RFS and I refer to page 11 section 7.04 of that report which actually states "Asset Protection Zones for residential development are determined from Table A2.4 of PBP or bushfire design modelling achieving a **radiant heat impact** of no more than 29 kW/m²".

During a meeting held on Thursday 7th June 2012 between representatives of the NSW Rural Fire Service Glendinning Office and bushfire consultants it was discussed that the RFS assessors are now sometimes applying the increased full loads of AS3959 – 2009 at the subdivision stage of an application (i.e. Appendix 2 requirements are attempting to be replaced with the addendum to Appendix 3 of PBP &

Table 2.4.2 of AS3959 - 2009). The consulting group was advised at this meeting by the RFS that the provisions of Appendix 2 of PBP 2006 do apply at the subdivision stage.

To date there has been no publications issued by the NSW Rural Fire Service stating that this is indeed the new assessment process for Residential Subdivisions or amending that position. I understand that Planning for Bush Fire Protection is currently under review, and that future additions may incorporate changes to the assessment process for residential subdivisions, however it has not been released for public comment nor has it had Ministerial approval. It has been confirmed by the RFS Glendinning Office that Appendix 2 of PBP 2006 is still the appropriate assessment for proposed subdivisions.

The development as it is currently proposed achieves compliance with the minimum required Asset Protection Zones as determined from Appendix 2 of Planning for Bush Fire Protection 2006 and therefore should be approved.

It is my opinion that the building footprints within the proposed new allotments can accommodate an APZ compliant with Appendix 2 of PBP 2006 and therefore I remain in support of the proposal.

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

Prepared by
Building Code & Bushfire Hazard Solutions



Wayne Tucker

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