

1<sup>st</sup> September 2022

**BRIGHTLANDS LIVING PTY LTD**

c/- Freedom Development Group  
Att: Rhys George  
Level 1, 822 George Street  
Chippendale NSW 2008

Our Reference: FDG120822  
Your Reference:

Subject: Bushfire constraints analysis (APZ & BAL) for  
proposed multi residential housing subdivision /  
lots, communal wellness facilities and restaurant  
Lot 1 DP1256287 (No.207) Broulee Road Broulee

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Dear Rhys,

As per various email advice and instructions, the following  
preliminary assessment of the subject site is now provided.

Please feel free to contact me and discuss any of the attached  
advice.

Sincerely



**Matt Jones**

*BAppSc Environmental Health*

*Grad. Dip Design for Bushfire Prone Areas*

**BPAD-L3-14598 Accredited Practitioner**

**Bushfire Protection Planning & Assessment Services Pty. Ltd**



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**Member of the Australian Bushfire  
Assessment Consultants Group**



# **PRELIMINARY BUSHFIRE COMPLIANCE / CONSTRAINTS ASSESSMENT FOR PROPOSED MULTI RESIDENTIAL HOUSING SUBDIVISION / LOTS, COMMUNAL WELLNESS FACILITIES AND RESTAURANT LOT 1 DP1256287 (No.207) BROULEE ROAD BROULEE**



The following comments are based on a desktop assessment only of the subject property (Lot 1 DP1256287 - No.207 Broulee Road Broulee, 127ha – Zoned RU1 & C2). Assumptions and judgement considered reasonable to the site circumstances and future development have been applied.

This subject property site is practically considered a lower risk location for bushfire safety, but likely a higher risk location for other ecological and planning constraints yet to be identified.

Based on this preliminary assessment of the site (considered conservative at this point in time), ≈60% of the site could reasonably facilitate and contain normal residential building development and ≈40% could reasonably facilitate and contain development categorised as [Special Fire Protection Purpose](#) (SFPP) – noting the community wellness facility would likely be considered SFPP development.

There would be a number of options (including modelled or performance based arguments) to identify what may be the land constraints and Asset Protection Zone (APZ) liabilities in this instance. For the purpose of a more simplified approach at this point of an assessment, the following APZ or setback distances are initially considered reasonable;

- 15m to any elongated riparian line or identified Vegetated Riparian Zone (VRZ),
- 20m to forested wetland vegetation,
- 29m to dry forest vegetation, &
- 50m for all vegetation types for SFPP development.

The above APZ distances are considered very 'general' and there should be ample room to adjust as may be required to progress with plans / overlays for the site. However, just as the above APZ distance maybe further reduced, there may also be alternate arguments to increase the APZ distances - depending on ecological and planning constraints.

The extent of potential forest / scrub vegetation within and surrounding the subject property has been derived from a reasonably / recent aerial image (Nearmap) of the site and consideration of past biometric mapping / datasets for the area.

Estimating specific BAL areas at this point of an assessment is considered pointless until proposed plans (concept or otherwise) indicate the areas / extent of vegetation types to be retained or re-introduced into



the site. Notwithstanding, the estimated 60% compliance area (76ha) effectively achieves BAL-29 and lower and the estimated 40% compliance area (52ha) effectively achieves BAL-12.5 and lower.

The subject property contains vegetation communities considered to be Ecologically Endangered and areas of Acid-Sulphate Soils...both of which are mostly associated with the lower lying / waterlogged / wetland areas. These areas (based on desktop assessment) have been considered as part of this preliminary assessment, but would be better defined / identified by qualified ecological and hydrological assessments of the size and extent (and constraint) of these areas within site.

Riparian lines and buffers (or Vegetated Riparian Zones – VRZ) are also derived from the available aerial image, also taking into account available drain line mapping for the area and [Guidelines for controlled activities on waterfront land Riparian corridors](#) (i.e. 10m VRZ buffers to first order drain lines & 40m buffers to wetland areas). Seven (7) VRZs have been identified for the purpose of this initial assessment, which may be underestimation or overestimation pending a qualified ecological and hydrological assessments of the site.

The lie of the land (for bushfire compliance purposes) is reasonably innocuous in as far as not reasonably exceeding 10° slope / gradient across the site and over interfacing lands. In this regard, there should be no slope constraints for APZ management and vehicle access within the site.

*The above assessment & general statements of compliance have been prepared by:*

**Matt Jones**

BAppSc Environmental Health  
Grad. Dip Design for Bushfire Prone Areas  
**BPAD-L3-14598 Accredited Practitioner**

*(I hereby certify that I have undertaken the assessment of the above site and determined the Bushfire Attack Level stated above in accordance with the requirements of NSW Planning for Bushfire Protection Guidelines 2019 or AS3959 where applicable)*

**BUSHFIRE PLANNING AND DESIGN ACCREDITATION  
SCHEME ACCREDITED PRACTITIONER**

Name **Matthew Jones**  
Accreditation No **BPAD14598**  
Valid Until **Feb 2023**  
Jurisdiction **NSW**



The holder of this card is accredited in accordance with the FPA Australia Bushfire Planning and Design Accreditation Scheme to perform the services listed on the reverse of this card.

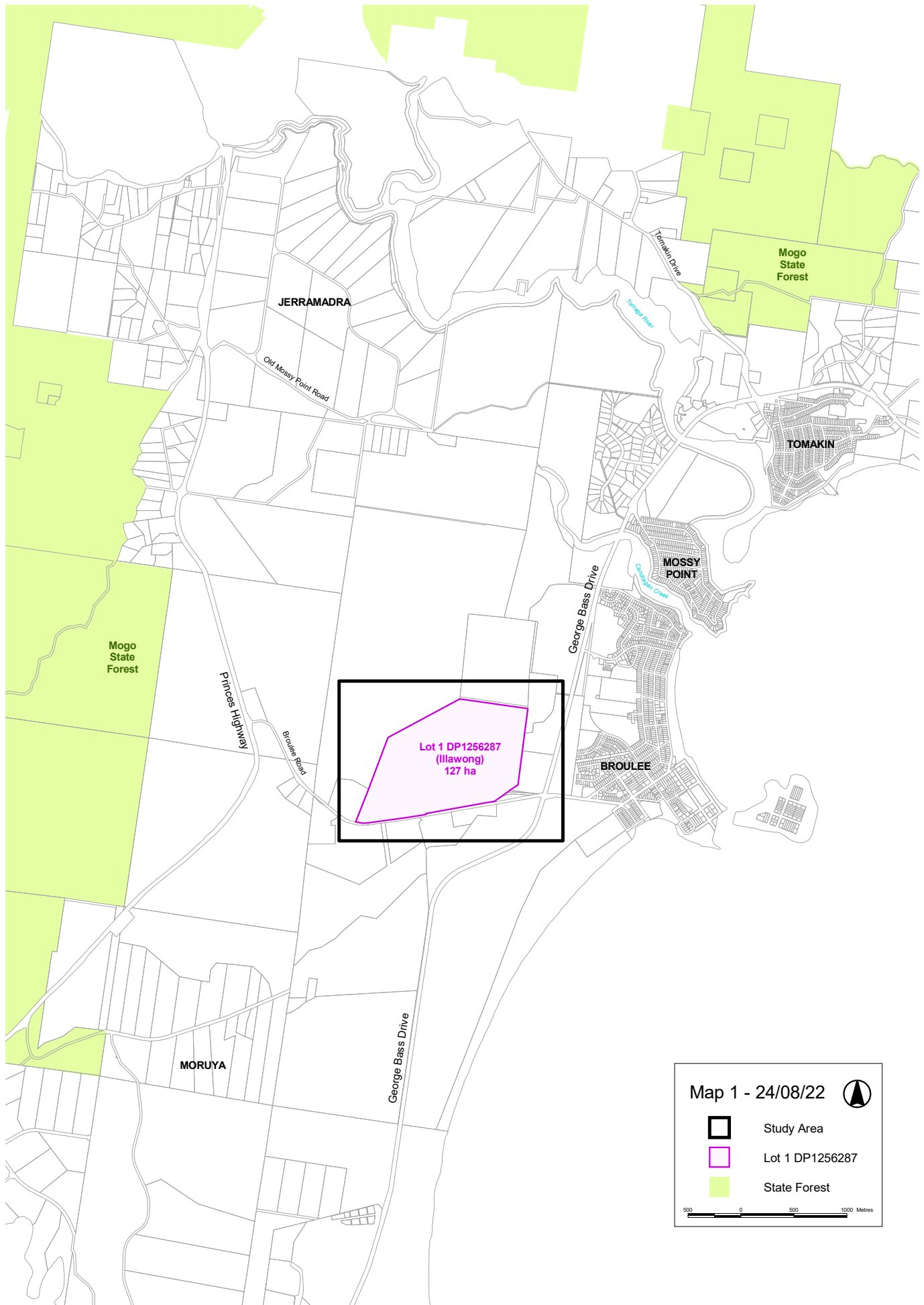
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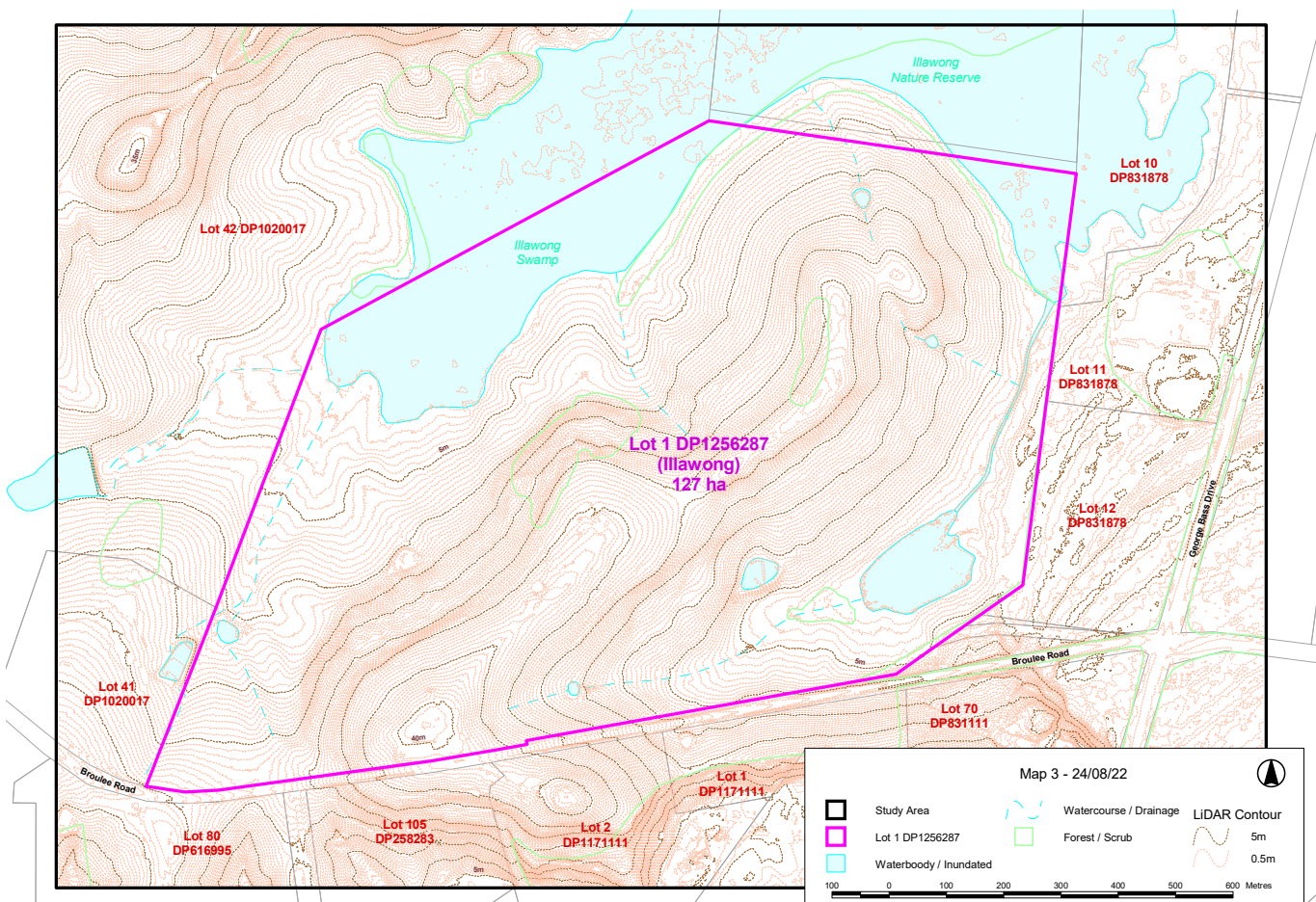
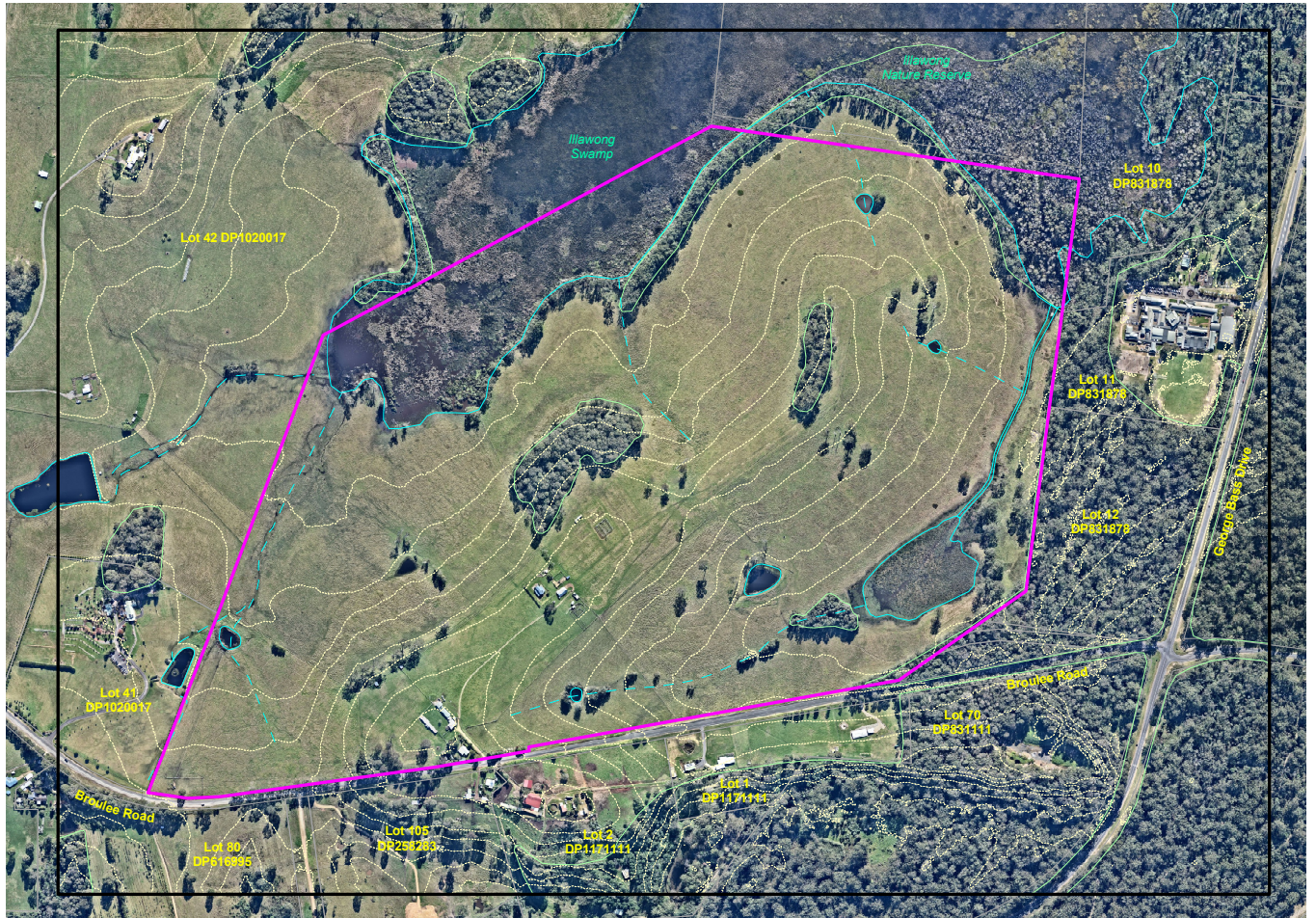
**TERM OF VALIDITY:** Opinions and statements made by this report are based on information at hand as at the date of the report. Should the following report require re-examination; please apply to Bushfire Protection Planning & Assessment Services. Bushfire Protection Planning & Assessment Services reserves the right at any time, subsequent to any date after this report, to vary it or make new recommendations based on any new environmental or any requirements at law.

**DISCLAIMER (1):** Bushfire mitigation or protection measures as identified, recommended or purported by this report may not guarantee that the identified or proposed development will survive or remain unaffected from a bushfire event on every occasion. This is substantially due to the unpredictable nature and behaviour of fire and extreme weather conditions, and the behaviour of building occupants or fire fighters defending the building when exposed to severe or greater bushfire attack conditions.

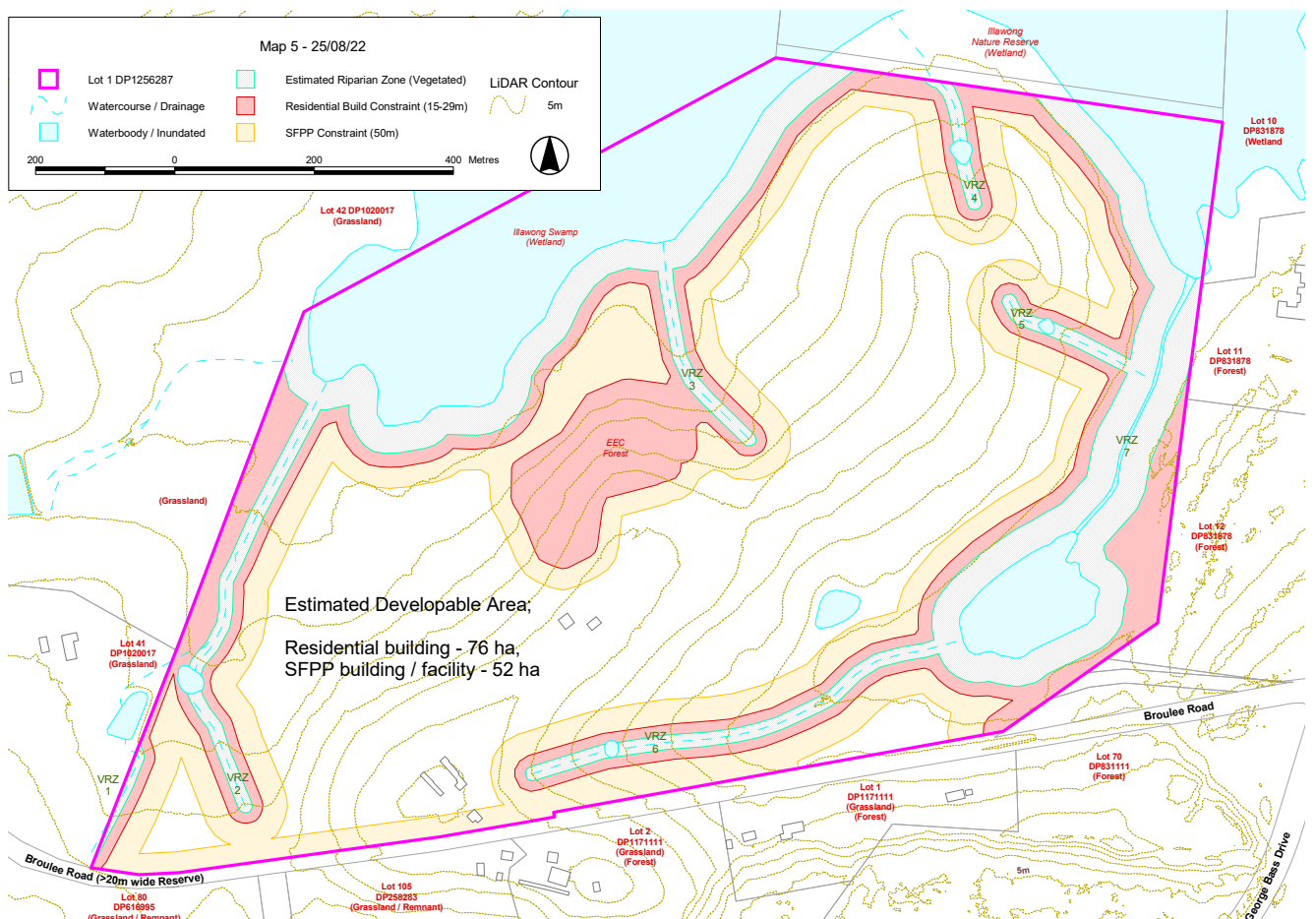
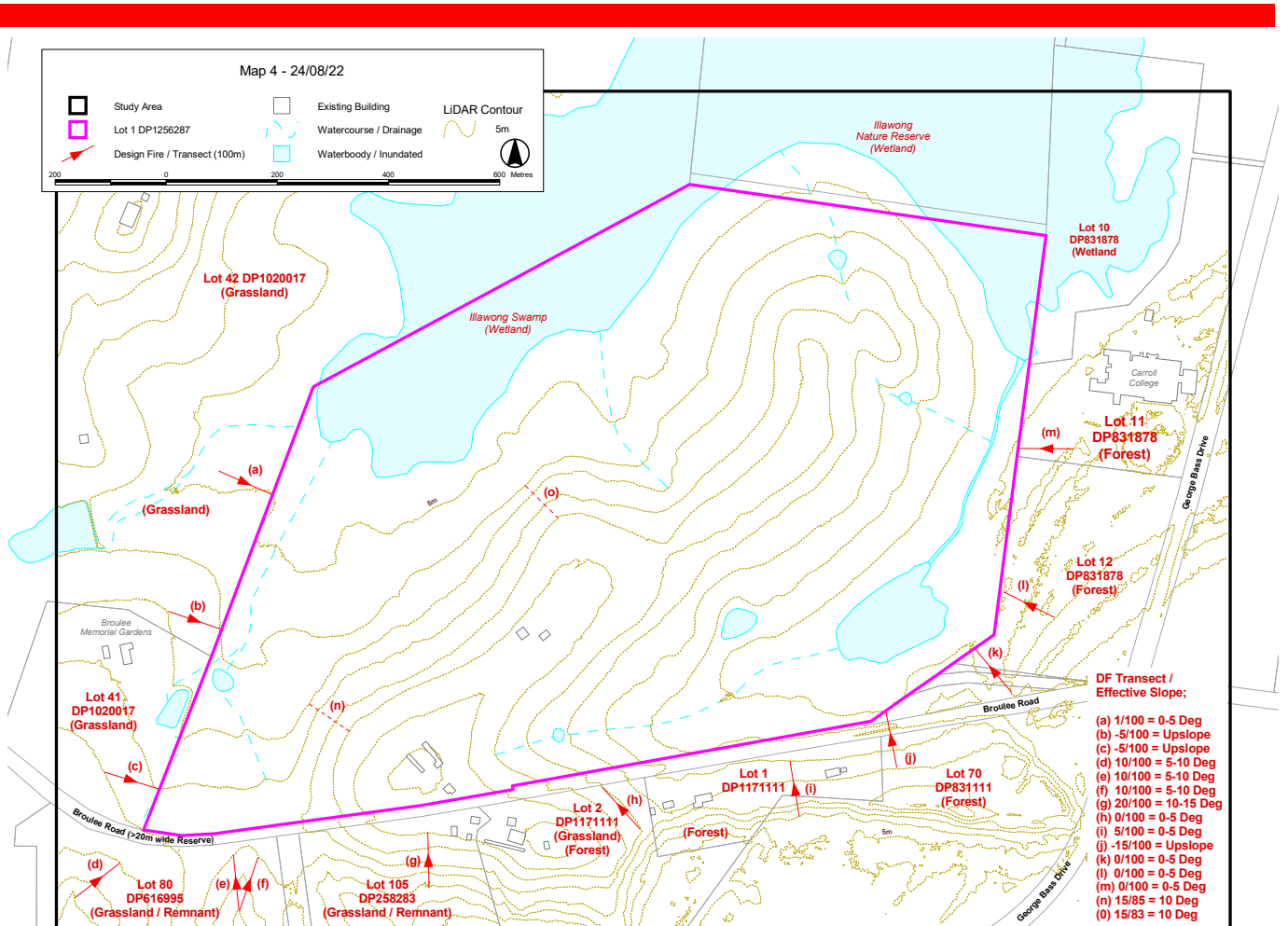
**DISCLAIMER (2):** Any failure to maintain bushfire mitigation or protection measures as identified, recommended, or purported by this report may compromise an insurance policy currently covering any assets, or those of any third party that may be consequentially affected, within the proposed development due to such failure. If not insured, and if seeking insurance, this report may not influence the decision of any insurer not to offer cover.

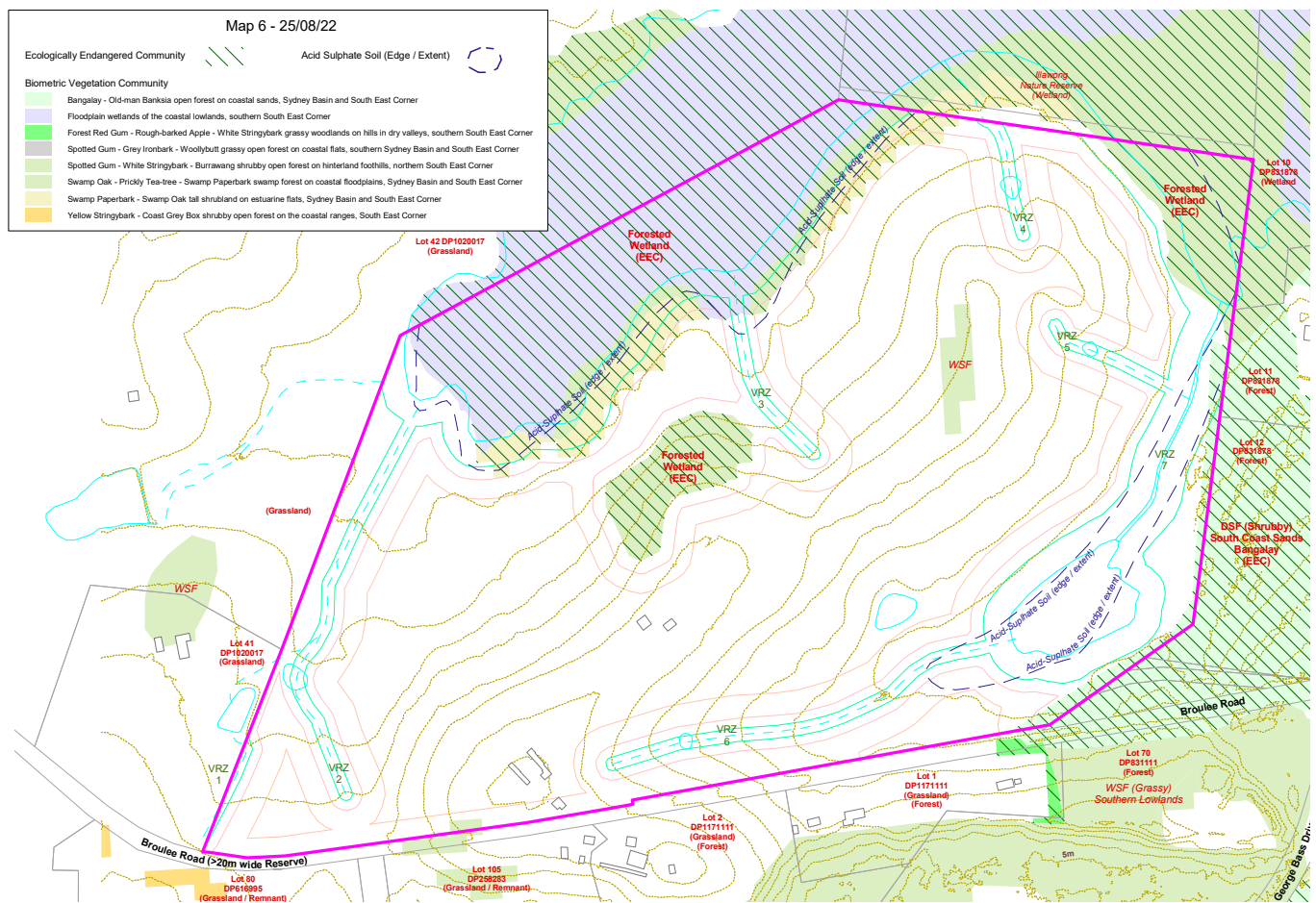


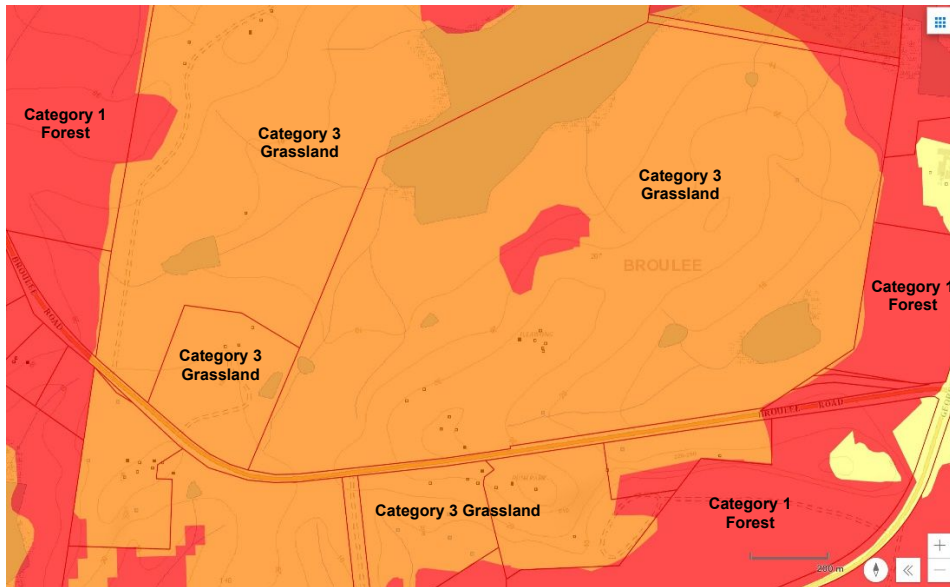




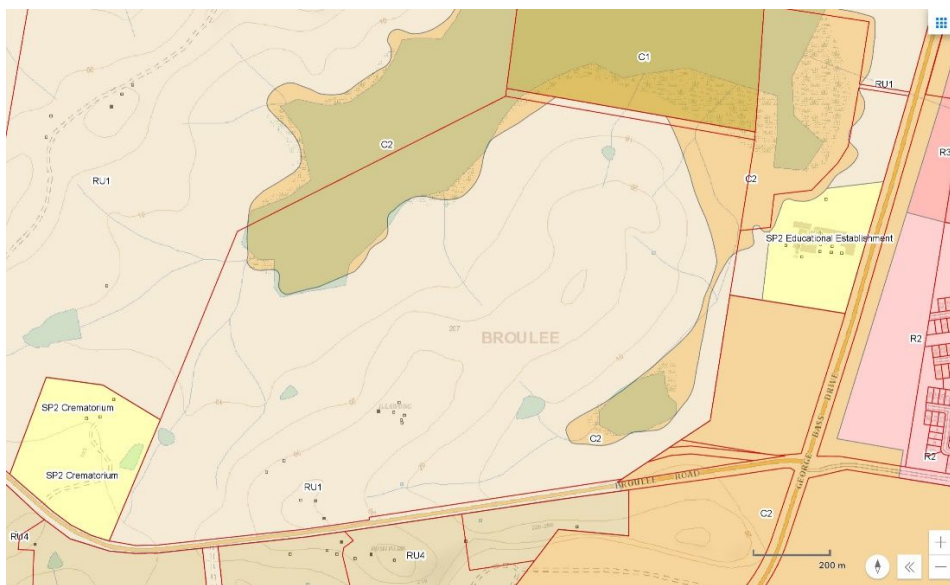




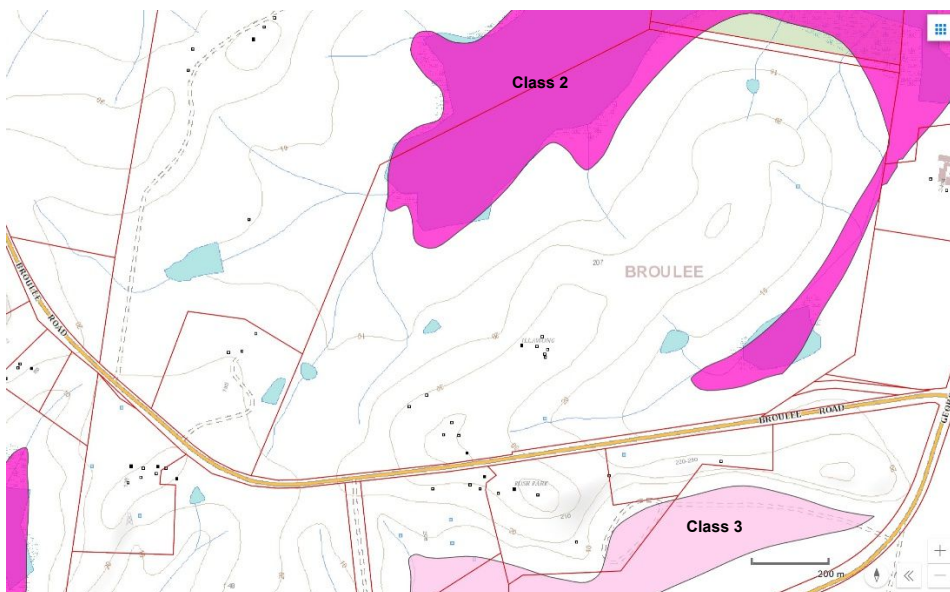




Bush Fire Prone Land Mapping  
 Courtesy: [ePlanning Spatial Viewer \(nsw.gov.au\)](https://ePlanning.SpatialViewer.nsw.gov.au)



LEP Zoning  
 Courtesy: [ePlanning Spatial Viewer \(nsw.gov.au\)](https://ePlanning.SpatialViewer.nsw.gov.au)



Acid-Sulphate Soil Mapping  
 Courtesy: [ePlanning Spatial Viewer \(nsw.gov.au\)](https://ePlanning.SpatialViewer.nsw.gov.au)