



PRE-DA ADVICE SUMMARY

Applicant: Tim Mecham – Building and Environmental Health

Subject: Lot 3//DP1201486 - 650 Burragorang Road (80 Silverdale Road), The Oaks NSW 2570
RFS Ref. PRE-DA20230829000162

Details of the Proposal

☐ SFPP

☒ Residential subdivision 16 Lot Residential Subdivision

☐ Other

Bush Fire Protection Issues Discussed

☒ Application and/or Interpretation of sections of *Planning for Bush Fire Protection* (PBP) 2019

☒ Performance Based Solutions

☒ Qualitative Analysis Classification of vegetation based on Section A1.9 *Exotic Vegetation* in PBP 2019.

☒ Quantitative Analysis Use of radiant heat modelling and short fire run methodology to assess the eastern hazard.

☐ Proposed Redundancies

☐ Strategic Bush Fire Study

☒ Non compliances in relation to Bush Fire Protection Measures

☒ Hazard Assessment Classification of vegetation based on Section A1.9 *Exotic Vegetation* in PBP 2019.

☐ Asset Protection Zones

☒ Access Fire trail access in lieu of a perimeter road.

☐ Construction Standards

☐ Services

☐ Emergency and
Evacuation Planning

Documentation

- ☒ Preliminary Bush Fire Risk Assessment Bush Fire Design Brief prepared by Building and Environmental Health
- ☒ Concept/Detailed Drawings Proposed plans of subdivision within the BFDB
- ☐ Other Documents

Pre DA Advice

- Preliminary review of the information provided indicates that there are no significant site or environmental constraints that warrant deviation from the acceptable solutions for a residential subdivision as detailed in PBP 2019.

In this regard, appropriate justification should be provided to demonstrate compliance of the layout with the performance criteria for the relevant bush fire protection measure as outlined in chapter 5 of PBP 2019, for hazard assessment and access in this instance, based on the bush fire risk profile.

- The following factors need to be considered and appropriately addressed in the bush fire report, when lodged as part of the development application to Council.
 - The use of fuel loads for vegetation classes based on interpretation of Section A1.9 and Table A1.9 (ie remnant classification to use rainforest fuel loads) as part of radiant heat modelling is not acceptable, unless substantiated in terms of presence and extent of the identified species to be deemed as the predominant hazard. The asset protection zones (APZs) applicable to rainforest, by treating the hazard as remnant, can be used as a deemed-to-satisfy solution in accordance with Table A1.12.5 of PBP 2019.
 - Therefore, further supporting evidence should be provided to substantiate the fuel loads used in radiant heat modelling, such as an ecologist's report to verify the predominant vegetation class. Available RFS GIS vegetation mapping categorises the hazard on the eastern aspect as Coastal Valley Grassy Woodland formation.
 - The use of the Short Fire Run methodology to assess the eastern hazard may be considered as part of a performance based solution for the proposed development, however the effects of steep slopes on fire behaviour need to be addressed and substantiated:
 - The implication of the high effective slope being around 30° down slope;
 - The risk and likelihood of the fire reaching the canopy due to steep slopes.
 - The substitution of a perimeter road with a fire trail for a portion of the site is not considered appropriate, unless justified to ensure safety to fire fighters and evacuating residents based on the potential bush fire risk as well as ongoing management and maintenance of the road being assured. As stated in Section 3.4.4 *Fire Trails* in PBP 2019 'A fire trail is not a substitute for a road, nor is it considered an appropriate trade-off for the provision of a perimeter, non-perimeter or property road access requirements'.
- Please note that the pre DA advice is not intended to provide pre approval of bush fire risk assessment to support a development application. The aim of the service is to identify any potential issues in relation to bush fire risk assessment before a formal development application is lodged. The advice issued is preliminary in nature and no detailed assessment of the site or development is undertaken at this stage. The service is not to be used for the purpose of submitting revised information/bush fire engineering brief for further review of the original advice.

Disclaimer

RFS advice is based on information provided and policy and legislative requirements applicable at the time. The advice should be copied into, or referenced in, any subsequent development application.

All efforts are made to identify issues of relevance and likely concern with the preliminary proposal. However, the comments and views in this document are based only on the plans and information submitted for preliminary assessment and discussion at the pre-DA meeting. You are advised that: -

- The views expressed may vary once detailed plans and information are submitted and formally assessed in the development application process, or as a result of issues contained in submissions by interested parties;
- Given the complexity of issues often involved and the limited time for full assessment, no guarantee is given that every issue of relevance will be identified;
- Amending any aspect of the proposal could result in changes which would create a different set of impacts from the original plans and therefore make this advice invalid; and,
- The Pre-DA advice given does not bind Council officers, the elected Council members, or other parties to the DA process.

Submitted by:

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Approved by:

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