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bushfire & ecology

# bushfire protection assessment

Residential Independent Living seniors housing

Lot 21 DP 100643 72 Glendower Street Gilead

for Site Compatibility Certificate

> December 2021 (Ref: 19HOPE002



# **Bushfire Protection Assessment**

Residential care facility and independent living seniors housing \ (Site compatibility certificate)

#### Lot 21 DP 100643 and Lot 3 DP 1007066 72 Glendower Street, Gilead

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# **EXECUTIVE SUMMARY**

A bushfire assessment has been undertaken for a proposed Seniors Living residential development project within Lot 21 DP 100643 located at 72 Glendower Street Gilead. The development proposes similar facilities to the existing Gilead Retirement Village, located within the adjacent Lot 2 DP 1065919.

The RFS identifies Seniors Living development as 'special protection development' and requires a higher level of bushfire protection in order that the elderly or handicapped persons can either reside on site safely for be evacuated from the site safely. As such this bushfire assessment has been undertaken in accordance with the controls and principles identified within *Planning for bushfire protection 2019* published by the NSW Rural Fire Service (RFS).



Figure X1 – Master plan development layout

The determination of asset protection zones has been identified by using an alternate solution approach and modelled using *Flamesol* software to insure radiant heat flux levels do not exceed 10  $K/wm^2$ . The alternate solution proposes a radiant heat shield barrier on the northern and western aspects.

All other bushfire protection measures, as required by PBP 2019, have been considered in reference to the performance standards of PBP 2019 and comply with those standards.

# **GLOSSARY OF TERMS**

APZ	asset protection zone
AS1596	Australian Standard – The storage and handling of LP Gas
AS2419	Australian Standard – Fire hydrant installations
AS3745	Australian Standard – Planning for emergencies in facilities
AS3959	Australian Standard – Construction of buildings in bushfire-prone areas 2009
BAL	bushfire attack level
BSA	bushfire safety authority
DA	development application
EEC	endangered ecological community
EP&A Act	Environmental Planning & Assessment Act 1979
FDI	fire danger index
ha	hectare
IPA	inner protection area
m	metres
NCC	National Construction Code
OPA	outer protection area
PBP	Planning for Bush Fire Protection 2006
RF Act	Rural Fires Act 1997
RMS	Roads and Maritime Services
RFS	NSW Rural Fire Service
SFPP	special fire protection purpose
TSC Act	Threatened Species Conservation Act 1995

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# Introduction

A bushfire assessment has been undertaken for a proposed Seniors Living residential development project within Lot 21 DP 100643 located at 72 Glendower Street Gilead.

The existing Gilead Retirement Village, located at Lot 2 DP 1065919, supports an approved independent living seniors housing and associated support services.

The development proposes similar facilities within Lot 21, asset protection zones and access road – see Figure 1.4 below.

The bushfire assessment has been undertaken in accordance with the controls and principles identified within *Planning for bushfire protection 2019* published by the NSW Rural Fire Service (RFS). The RFS identifies Seniors Living development as 'special protection development' and requires a higher level of bushfire protection in order that the elderly or handicapped persons can either reside on site safely for be evacuated from the site safely.

The determination of asset protection zones has been identified by using an alternate solution approach and modelled using *Flamesol* software to insure radiant heat flux levels do not exceed 10  $K/wm^2$ . The alternate solution proposes a radiant heat shield barrier on the northern and western aspects.



Figure 1.1 - Location plan (Nearmaps)

## 1.1 Aims of the assessment

The aims of the bushfire protection assessment are to:

- respond to the matters raised by the RFS in early 2020
- review the bushfire threat to the landscape
- undertake a bushfire attack assessment in accordance with *PBP*
- provide advice on mitigation measures, including the provision of APZs, construction standards and other specific fire management issues
- review the potential to carry out hazard management over the landscape.



Figure 1.2 – Location plan of affected allotments

## 1.2 Project synopsis

The development proposal is a master plan approach to facilitate the;

- 1. Development of Independent Living Units within the existing Gilead Retirement Village.
- 2. Construction of a new road entry that resolves local traffic issues.
- 3. Create a conservation zone on the retained vegetation with Lot 21.

The development will occur within Lot 21 whilst the existing Gilead Retirement Village, located at Lot 2 DP 1065919, supports an approved independent living seniors housing and associated support services. The landscape within Lot 2 has been mostly cleared arising from past grazing

practices including roads and other allied structures. The land within Lot 21 was previously grazing land and has been subject to regeneration processes since 2002. Figure 1.3 below depicts the vegetation state in 1990.



Figure 1.3 - Aerial photo date 1990

Schedule 1 shows the proposed development and bushfire protection measures, including APZs at a larger scale than Figure 1.4. Land to the east within Lot 19 is owned and managed by Campbelltown City Council and is managed to an APZ standard to protect the urban landscape to the immediate east. Land within Lot 21 has an existing 50m wide APZ approved by DA consent in 2006 - see Figure 1.4 and the darker green colour which occurs in the lower half of Lot 21. The land is zoned Rural RU2 and is grazed by goats similar to the NSW RFS recent hazard action in southwest Sydney.



**Figure 1.4** – development footprint and the new asset protection zone proposed for Lot 21 (*David Benson Architecture*)

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## 1.3 Information collation

To achieve the aims of this report, a review of the information relevant to the property was undertaken prior to the initiation of field surveys. Information sources reviewed include the following:

- Site design plans prepared by *Benson McCormack Architecture* (December 2021)
- Survey 'gradient long sections' prepared by surveyors *JMD & Associates* (October 2020)
- Tree survey prepared by surveyors JMD & Associates (July 2020)
- Fluvial Geomorphology report by *Strategic Environmental & Engineering Consulting* (SEEC) Pty Ltd (July 2020)
- Ecological BDAR (Hayes Environmental (2021)
- Koala Assessment report by (Biolink 2021)
- Koala Occupancy and Habitat by (*Biolink* 2021)
- Campbelltown Local Environmental Plan (2011)
- Planning for Bush Fire Protection 2019 (PBP) (RFS).
- *NearMap* aerial photography (2020)
- Topographical data DLPI of NSW 1:25,000
- Australian Standard Construction of buildings in bushfire-prone areas (AS3959)

Inspections of the proposed development site and surrounds were undertaken by John Travers on many occasions between 2005 and November 2021 to assess the topography, slopes, aspect, drainage, vegetation and adjoining land use.

The identification of existing bushfire measures and a visual appraisal of bushfire hazard and risk were also undertaken.

#### 1.4 Site description

The landscape within Lot 21 is composed of native vegetation over the majority of the western portion and a cleared grass landscape with clumps of trees over the eastern portion – see Figure 1.2 above.

The topography is varying between mostly undulating and relatively steep within the development envelope proposed for the Independent Living Units. The gully will be filled with fill material sourced from the existing development infrastructure works occurring to the south within Lot 2.

Detailed survey has been undertaken by the project surveyor *JMD & Associates* based on the needs of the bushfire assessment. This has included;

- Detailed pick up and numbering of all trees within the proposed APZ.
- Detailed contour survey with on-ground techniques not using Lidar.
- Preparation of survey long sections to derive correct slope accuracy.

#### 1.5 Legislation and planning instruments

#### 1.5.1 Environmental Planning and Assessment Act (EP&A Act)

The proposed development is located on land mapped by Campbelltown City Council as being bushfire prone – see Figure 1.5. This type of development triggers a formal assessment by Council in respect of the RFS policy entitled *Planning for Bush Fire Protection 2019 (PBP)*.



Figure 1.5 – Bushfire prone land map (January 2021)

# 1.5.2 Rural Fires Act 1997 (RF Act)

This type of development is an integrated development under Section 4.46 of the *Environmental Planning & Assessment Act.* 

Section 100B of the *Rural Fires Act 1007 (RF Act)* states that the Commissioner is required to issue a BSA for a special fire protection purpose (SFPP) development when it occurs on bushfire prone land.

#### 1.5.3 Planning for Bush Fire Protection 2019 (PBP)

Bushfire protection planning requires the consideration of the RFS planning document entitled *PBP. PBP* provides planning controls for building in bushfire prone areas as well as guidance on effective bushfire protection measures.

The policy aims to provide for the protection of human life (including fire fighters) and to minimise impacts on property and the environment from the threat of bushfire, while having due regard to development potential, on site amenity and protection of the environment. More specifically, the aims and objectives for all development located on bushfire prone land should:

- 1. afford buildings and their occupants protection from exposure to a bush fire;
- 2. provide for a defendable space to be located around buildings;

- 3. provide appropriate separation between a hazard and buildings which, in combination with other measures, prevent the likely fire spread to buildings;
- 4. ensure that appropriate operational access and egress for emergency service personnel and occupants is available;
- 5. provide for ongoing management and maintenance of BPMs; and
- 6. ensure that utility services are adequate to meet the needs of firefighters.

As the aged care development is a type of development regarded by the RFS as a SFPP development, PBP requires additional objectives to be considered. These include the need to:

- 7. minimise levels of radiant heat, localised smoke and ember attack through increased APZ, building design and siting;
- 8. provide an appropriate operational environment for emergency service personnel during firefighting and emergency management;
- 9. ensure the capacity of existing infrastructure (such as roads and utilities) can accommodate the increase in demand during emergencies as a result of the development; and
- 10. ensure emergency evacuation procedures and management which provides for the special characteristics and needs of occupants.
- 11. The nature of SFPP developments means that occupants may be more vulnerable to bushfire attack for because they may;
  - they may be less aware in relation to bush fire impacts.
  - they may have reduced capacity to evaluate risk and respond adequately to the bush fire threat.
  - they may present operational difficulties for evacuation and or management.
  - they may be more vulnerable to stress and anxiety arising from bush fire threat and smoke.
  - there may be significant communication barriers.
  - supervision during a bush fire may be difficult; and
  - they may be unfamiliar with the area.

In addition, *PBP* outlines the bushfire protection measures required to be assessed for new development in bushfire prone areas. The proposal has been assessed in compliance with the following measures:

- asset protection zones
- building construction and design
- access arrangements
- water supply and utilities
- landscaping, and
- emergency management arrangements.

#### 1.5.4 National Construction Code (NCC) and the Australian Standard AS3959 Construction of buildings in bushfire-prone areas 2009 (AS3959)

The *NCC* outlines objectives, functional statements, performance requirements and deemed to satisfy provisions. In NSW, construction in bushfire prone areas applies to Classes 2, 3, 4 and 9b buildings or a Class 10a associated with Classes 2, 3, 4 & 9b buildings. The construction manual for the deemed to satisfy requirements is the *AS3959*.

#### **1.6** Environmental and cultural constraints

Native vegetation within the study area is commensurate with Cumberland Plain Woodland which is listed within the NSW *BC Act* (2016) as a Critically Endangered Ecological Community. It is also commensurate with Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest which is also listed within the Commonwealth *EPBC Act* (1999) as a Critically Endangered Ecological Community.

Ecological reports have been prepared inclusive of;

- Biodiversity constraints assessment by Travers bushfire & ecology in December 2021
- Biodiversity development assessment report by *Hayes Environmental* in November 2021
- Koala assessment by *Biolink* in June 2021
- Koala occupancy and habitat by *Biolink* in December 2021



To assess the bushfire threat and to determine the required width of an APZ for a development, a review of the elements that comprise the overall threat needs to be completed. *PBP* provides a methodology to determine the size of any APZ that may be required to offset possible bushfire attack. These elements include the potential hazardous landscape that may affect the site and the effective slope within that hazardous vegetation.

#### 2.1 Hazardous fuels

*PBP* guidelines require that bushfire hazards should be calculated for a distance of at least 140m from a proposed building envelope or a property boundary.



Figure 2.1 – Aerial appraisal of hazards (source: NearMap)

The RFS also requires that the hazardous vegetation be identified correctly when considering using an alternative solution and in that regard the hazardous vegetation to the west and south is classified by OEH as PCT 850 *Grey Box Forest Red Gum woodland on Shale of the southern Cumberland Plain, Sydney Basin Bioregion - Cumberland Plain Woodland.* 

*Ocean Shores to Desert Dunes* (David Keith, 2004) at (Pp 86) advises this community is a *Coastal Valley Grassy Woodand* formation.

The RFS comprehensive fuel descriptor publication (*Comprehensive vegetation fuel loads*) advise the fuels of that community (*Coastal Valley GW*) equate to 10.0 / 18.07 tonnes per hectare.

The tree survey undertaken by the surveyors reveal the trees density is comprised principally of saplings (see Figure 2.2) amongst a dense array of the tall (tree formation) bushy weed namely African Olive (small tree). This weed grows to about 10m and has infested the CPW assemblage and changed its structural formation. The African Olive is now being removed by a specialist bush regeneration firm *Toolijooa*.

Arising from the fact that the vegetation community is in an early regeneration phase formation we have felt uncomfortable about using that vegetation description and associated fuel loads so we have assigned a higher fuel load of 14/24.97 t/ha based on the forest assemblage of *Cumberland dry sclerophyll forest* due to its similar constituent tree species being Forest Red Gum and their occurrence on occasional shale-gravel soils – see Pp 126/127 of *Ocean Shores to Desert Dunes* (David Keith, 2004). This community represents a similar low surface fuel structure equivalent to the natural grassy woodland - but with higher aerial fuels.

#### 2.2 Effective slope

The slope gradient of the hazard vegetation is assessed for a distance of up to 100m. The slope that is best determined as effecting the likely behaviour is the effective slope. A mean average slope may not in all cases provide sufficient information such that an appropriate bushfire behaviour assessment can be determined. To determine the effective slope that could impact the residential structures it was necessary to seek several 'long sections' from the surveyor in order to understand slope characteristics.

Figure 2.2 below indicates the complexity of the contour lines and the variety of elevations and aspects that can have a distinct bearing on determining the bushfire impact.

We sought surveyors assistance and four (4) 'long sections' were prepared by the surveyor – see Figure/s 2.3 - 2.6.

Figure 2.3 indicates the location of the sections and the general pattern of contours that affect those long sections.

- Figure 2.4 depicts the long section gradient for Long Section 1 Northwest.
- Figure 2.5 depicts the long section gradient for Long Section 2 Northwest.
- Figure 2.6 depicts the long section gradient for Long Section 3 West.
- Figure 2.7 depicts the long section gradient for Long Section 4 West.

Aspect	Length of section from surveyor (m)	Height differences in section (m)	Slope gradient (% / deg)
Long Section 1	44.65	146.719 - 144.024 = 2.695	6.04% / 3.45 deg down slope
Long Section 2	75.00	142.587 - 140.40 = 1.437	1.92 % / 1.1 deg down slope
Long Section 3	78.93	128.641 - 136.430 = 7.789	9.87 % / 5.64 deg down slope
Long Section 4	58.55	140.867 - 144.206 = 3.339	5.70 % / 3.26 deg down slope

Table 2.1 - Slope gradient of the Long Sections by the surveyor

#### 2.2.1 Long section calculations

Long section calculations are derived by measuring the slope of the hazard using a surveyor's line which graphically shows the 'slope variations of the slope along a measured chainage'. The long section graphic at Figure 2.2 depicts three (3) rows in the graphic. The bottom row is the chainage measured in metres. The second row (above) is the existing ground level in metres. The upper third row is the (final) design level. We have selected the edge of the APZ that being left of the proposed road on the graph – see Figure 2.3. By reading the curve of the graph you can readily identify the effective slope and then measure that extent by reviewing the chainage under the two end points of the (your) effective slope. Remember not to add the APZ area in that assessment as you are measuring hazard only.



Figure 2.2 – slope gradient for the western aspect



**Figure 2.3** – Location of the four (4) long sections from JMD (surveyors) survey plan (October 2020) Th top red line is Long Section 1 and the remaining Long Sections extends in a southerly direction.











Figure 2.6 – Long Section no 3



Figure 2.7 - Long Section no 4



#### 2.2.1 Additional slope calculations

Two additional slope gradients were derived using *Mecone Mozaic (2021) Lidar data* – see Figure 2.8 & 2.9; and Table 2.2.



Figure 2.8 – North/South line slope assessment from Lot 21 into Lot 3



Figure 2.9 – Northwest slope validation from Building R4 out 101m

Aspect	Length in hazard (m)	Elevation (m)	Calculation of gradient (deg)
North (as per Figure 2.8)	100	152-147.5 = 4.5	2.58 deg <b>upslope</b>
Northwest see Figure 2.9 which represents the northwesterly 50m dimension shown on Figure 2.11 below	140	146-134 = 12.0	4.90 deg down slope

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#### 2.2.1 Site Slope - west to east axis)

The west to east site slope is shown in Figure 2.10 and by the calculation shown - as 6.63 degrees. The north to south site slope is taken in the modelling as zero degrees.





Figure 2.10 - West to east axis of the Site Slope

#### 2.3 Bushfire attack assessment

A fire danger index (FDI) of 100 has been used to calculate bushfire behaviour on the site based on its location within the Greater Sydney region.

Table 2.3 provides a summary of the bushfire attack assessment and the minimum required APZs (i.e. to ensure radiant heat <10  $kWm^2$ ).

The bushfire attack assessment has used an alternative solution approach as calculated by applying Method 2 of AS3959 and permitted by PBP 2019 (Section A1.8) using *Flamesol* radiant heat shield software to determine the required APZ dimensions and radiant heat shield heights for the western and northern aspects.

- The western radiant heat shield is **4.0m** high metal fence see orange coloured line in Figure 2.11.
- The northern radiant heat shield is a **3.2m** high metal fence see black coloured line in Figure 2.11.



**Figure 2.11** – APZ location; and location of the 3.2m high radiant heat barrier (black line is the northern barrier) and the 4.0 high radiant heat barrier (Orange line is the western barrier) - see Schedule 1 for larger scale plans after page 34)

Long sections (from surveyor)	Aspect	Slope (deg)	Vegetation formation	APZ (metres)	Radiant heat (k/Wm²)	Computer output
1	Northwest	3.45 down	Forest	50	9.38	Table 2.4
2	Northwest	1.11 down	Forest	70	4.92	Table 2.5
3	West	5.64 down	Forest	63	7.51	Table 2.6
4	West	3.26 down	Forest	73	4.94	Table 2.7

See Fig 2.8	North	3.43 <b>up</b>	Forest	38	9.02	Table 2.8
See Fig 2.9	Northwest	2.58 down	Forest	53	8.34	Table 2.9
Similar to Fig	Northwest	3.21 down	Forest	50	9.77	Table 2.10
2.9						

The buildings are at different heights as they rise up the slope - as can be seen at Figure 2.12.

- Building identification numbers are indicated in Figure 2.13.
- The actual upper heights of the buildings are shown in Figure 2.14 and are the 'above the designed finished ground level'.
- Heights of the base for each building are provided on the architects plans for each elevation see Appendix 1; and note on each plan bottom left the RL for that number which indicates the ground level height in metres. The base elevation of H1 building is 144.70 whilst the base elevation for R3 & R4 is 147.80.
- Each level has a finished height difference of approx' 3.0m.

162.90m
169.50m
176.30m
168.40m

- The modelled 'receiver elevation' of R3 & R4 is taken from the top of the building which is shown on Figure 2.14.
- The height of R3 & R4 above edge of the hazard is calculated as 169.50m minus 144.70m = 24.80m.
- The height of H1 (radiant heat shield barrier) is 162.90m minus 144.70m = 18.2m.

Therefore, for modelling purposes the radiant heat shield barrier is 18.2m shielding a building which is 24.80m at roof level located on a generalised slope of 7 degrees. Buildings R3 & R4 are therefore 6.60m higher in elevation than B1.



Figure 2.12 – location of the buildings up the slope (from west to east)



Figure 2.13 – numbering of each building



Figure 2.14 – elevation (in metres) above ground for each roof height

#### Table 2.4 – Section 1, West aspect modelled output

Radiant heat flux affection upon SPD structures as shown in Figure 2.11 based on 50m APZ and utilising a **3.2m** radiant heat barrier Hazard slope gradient of 3.45° and site slope of 0°.



Calculated December 17, 2021, 10:17 am (RHBc v.1.4)

Section 1- Northwest

Radiant Heat Barrier calculator - AS3959-2018				
Inputs		Outputs		
Fire Danger Index	100	Rate of spread	2.13 km/h	
Vegetation classification	Forest	Flame length	16.85 m	
Understorey fuel load	14 t/ha	Flame angle	77 •	
Total fuel load	24.97 t/ha	Panel height	16.41 m	
Vegetation height	n/a	Elevation of receiver	8.199999999999999 m	
Effective slope	3.45 °	Effective barrier height	4 m	
Site slope	0 °	Fire intensity	27,499 kW/m	
Distance to vegetation	50 m	Transmissivity	0.78	
Flame width	100 m	Viewfactor	0.1394	
Windspeed	n/a	Radiant heat flux	12.16 kW/m²	
Heat of combustion	18,600 kJ/kg	Viewfactor of barrier	0.0318	
Flame temperature	1,200 K	Adjusted viewfactor	0.1075	
Actual barrier height	4 m	Adjusted radiant heat flux	9.3800000000001 kW/m²	
		Bushfire Attack Level	BAL-12.5	

Rate of Spread - Mcarthur, 1973 & Noble et al., 1980

Flame length - NSW Rural Fire Service, 2001 & Noble et al., 1980

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

#### Table 2.5 – Section 2, West aspect modelled output

Radiant heat flux affection upon SPD structures as shown in Figure 2.11 based on 70m APZ and utilising a **3.2m** radiant heat barrier Hazard slope gradient of 1.1° and site slope of 0°.



Calculated December 17, 2021, 12:45 pm (RHBc v.1.4)

Section 2 - Western aspect

Radiant Heat Barrier calculator - AS3959-2018				
Inputs		Outputs		
Fire Danger Index 100		Rate of spread	3.23 km/h	
Vegetation classification	Forest	Flame length	25.25 m	
Understorey fuel load	25 t/ha	Flame angle	74 °	
Total fuel load	35 t/ha	Panel height	24.27 m	
Vegetation height	n/a	Elevation of receiver	12.13 m	
Effective slope	1.11 °	Effective barrier height	4 m	
Site slope	0 °	Fire intensity	58,568 kW/m	
Distance to vegetation	70 m	Transmissivity	0.759	
Flame width	100 m	Viewfactor	0.1281	
Windspeed	n/a	Radiant heat flux	10.86 kW/m²	
Heat of combustion	18,600 kJ/kg	Viewfactor of barrier	0.0191	
Flame temperature	1,200 K	Adjusted viewfactor	0.109	
Actual barrier height	4 m	Adjusted radiant heat flux	9.24 kW/m²	
		Bushfire Attack Level	BAL-12.5	

Rate of Spread - Mcarthur, 1973 & Noble et al., 1980

Flame length - NSW Rural Fire Service, 2001 & Noble et al., 1980

Elevation of receiver - Douglas & Tan, 2005

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#### Table 2.6 – Section 3, West aspect modelled output

Radiant heat flux affection upon SPD structures as shown in Figure 2.11 based on 63m APZ, radiant heat barrier of **4.0m** hazard slope of 5.64° and site slope of 7°.



#### Calculated December 17, 2021, 12:36 pm (RHBc v.1.4)

Section 3 Radiant Heat Barrier calculator - AS3959-2018 Inputs Outputs Fire Danger Index 100 Rate of spread 2.47 km/h Vegetation classification Forest Flame length 19.1 m Understorey fuel load 14 t/ha Flame angle 84 ° Total fuel load 24.97 t/ha Panel height 18.99 m Elevation of receiver Vegetation height 1.76 m n/a Effective slope 5.63 ° Effective barrier height 4 m 70 Site slope Fire intensity 31,963 kW/m Distance to vegetation 63 m Transmissivity 0,763 Flame width 100 m Viewfactor 0.1108 Windspeed Radiant heat flux 9.449999999999999 kW/m2 n/a Heat of combustion Viewfactor of barrier 18,600 kJ/kg 0.0228 Adjusted viewfactor 0.0879999999999999999 Flame temperature 1,200 K Actual barrier height Adjusted radiant heat flux 7.51 kW/m<sup>2</sup> 4 m Bushfire Attack Level BAL-12.5

Rate of Spread - Mcarthur, 1973 & Noble et al., 1980

Flame length - NSW Rural Fire Service, 2001 & Noble et al., 1980

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan. 2005

#### Table 2.7 – Section 4, Western aspect modelled output

Radiant heat flux affection upon SPD structures as shown in Figure 2.11 based on 45m APZ and utilising a **4.0m** radiant heat barrier from the Building B1. Hazard slope gradient of 3.26° and site slope of 7°.



Calculated December 17, 2021, 12:48 pm (RHBc v.1.4)

Section 4 - West

Radiant Heat Barrier calculator - AS3959-2018				
Inputs		Outputs		
Fire Danger Index	100	Rate of spread	2.1 km/h	
Vegetation classification	Forest	Flame length	16.67 m	
Understorey fuel load	14 t/ha	Flame angle	87 °	
Total fuel load	24.97 t/ha	Panel height	16.64 m	
Vegetation height	n/a	Elevation of receiver	<mark>0 m</mark>	
Effective slope	3.26 °	Effective barrier height	4 m	
Site slope	7 °	Fire intensity	27,141 kW/m	
Distance to vegetation	73 m	Transmissivity	0.753	
Flame width	100 m	Viewfactor	0.077	
Windspeed	n/a	Radiant heat flux	6.48 kW/m²	
Heat of combustion	18,600 kJ/kg	Viewfactor of barrier	0.0182	
Flame temperature	1,200 K	Adjusted viewfactor	0.0587	
Actual barrier height	4 m	Adjusted radiant heat flux	4.94 kW/m²	
		Bushfire Attack Level	BAL-12.5	

Rate of Spread - Mcarthur, 1973 & Noble et al., 1980

Flame length - NSW Rural Fire Service, 2001 & Noble et al., 1980

Elevation of receiver - Douglas & Tan, 2005

#### Table 2.8 – Section 5, Northern aspect modelled output

Radiant heat flux affection upon SPD structures as shown in Figure 2.11 based on 38m APZ and utilising a **3.2m** radiant heat wall. Hazard slope gradient of -3.33° and site slope of 0°.



Calculated December 17, 2021, 4:00 pm (RHBc v.1.4)

#### Northern aspect

Radiant Heat Barrier calculator - AS3959-2018				
Inputs		Outputs		
Fire Danger Index	100	Rate of spread	1.33 km/h	
Vegetation classification	Forest	Flame length	11.67 m	
Understorey fuel load	14 t/ha	Flame angle	79 °	
Total fuel load	24.97 t/ha	Panel height	11.46 m	
Vegetation height	n/a	Elevation of receiver	5.73 m	
Effective slope	-3.33 °	Effective barrier height	3.2 m	
Site slope	0 °	Fire intensity	17,224 kW/m	
Distance to vegetation	38 m	Transmissivity	0.799	
Flame width	100 m	Viewfactor	0.1379	
Windspeed	n/a	Radiant heat flux	12.32 kW/m²	
Heat of combustion	18,600 kJ/kg	Viewfactor of barrier	0.0368	
Flame temperature	1,200 K	Adjusted viewfactor	0.101	
Actual barrier height	3.2 m	Adjusted radiant heat flux	9.02 kW/m²	
		Bushfire Attack Level	BAL-12.5	

Rate of Spread - Mcarthur, 1973 & Noble et al., 1980

Flame length - NSW Rural Fire Service, 2001 & Noble et al., 1980

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

#### Table 2.9 – Section 6, Northwestern aspect modelled output

Radiant heat flux affection upon SPD structures as shown in Figure 2.11 based on 50m APZ and utilising a **3.2m** radiant heat wall. Hazard slope gradient of 2.58° and site slope of 7°.



Calculated December 17, 2021, 4:09 pm (RHBc v.1.4)

Northwest

Radiant Heat Barrier calculator - AS3959-2018				
Inputs		Outputs		
Fire Danger Index	100	Rate of spread	2 km/h	
Vegetation classification	Forest	Flame length	16.04 m	
Understorey fuel load	14 t/ha	Flame angle	85 °	
Total fuel load	24.97 t/ha	Panel height	15.98 m	
Vegetation height	n/a	Elevation of receiver	1.48 m	
Effective slope	2.58 °	Effective barrier height	3.2 m	
Site slope	7 °	Fire intensity	25,897 kW/m	
Distance to vegetation	53 m	Transmissivity	0.775	
Flame width	100 m	Viewfactor	0.1199	
Windspeed	n/a	Radiant heat flux	10.38 kW/m²	
Heat of combustion	18,600 kJ/kg	Viewfactor of barrier	0.0235	
Flame temperature	1,200 K	Adjusted viewfactor	0.0964	
Actual barrier height	3.2 m	Adjusted radiant heat flux	8.34 kW/m²	
		Bushfire Attack Level	BAL-12.5	

Rate of Spread - Mcarthur, 1973 & Noble et al., 1980

Flame length - NSW Rural Fire Service, 2001 & Noble et al., 1980

Elevation of receiver - Douglas & Tan, 2005



# Specific Protection Issues

## 3.1 Asset protection zones

*PBP* dictates that the subsequent extent of bushfire attack that can potentially emanate from a bushfire must not exceed a radiant heat flux of  $10kW/m^2$  for SFPP developments. This rating assists in determining the size of the APZ in compliance with Appendix 2 of *PBP* to provide the necessary defendable space between hazardous vegetation and a building. Table 3.1 outlines the proposal's compliance with the performance criteria for APZs.

Performance criteria	Acceptable solutions	Complies
radiant heat levels of greater than 10kW/m² (calculated at 1200K) will not be experienced on any part of the building.	the building is provided with an APZ in accordance with Table A1.12.1 in Appendix 1	Complies using the RFS approved alternative solution approach Method 2 (as outlined within AS3959) for the western and southern aspects.
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	Complies
APZs are managed and maintained to prevent the spread of fire to the building	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;	Complies
the APZ is provided in perpetuity	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	

## Table 3.1 – Performance criteria for asset protection zones (PBP guidelines pg. 19)

#### Development within the APZ

Other development is permissible <u>within</u> the proposed asset protection zones as shown on Figure 3.1 but only where that development is allied to ILU's such as;

- Infrastructure Car parks, roads, water pump devices, electrical substations, dams, detention basins ect'.
- Functional allied assets garages, sheds, car ports, storage facilities but only when they are >6m from a dwelling.
- Other development such as management facilities (office).



Figure 3.1 - location of APZ's

Where other forms of development are required then they are considered by the RFS in PBP as Other Development (refer to PBP section 8 on page 73 and onwards);

Arising from the fact that Special Protection Developments, such as being proposed within Lot 21, are subject to the largest APZ dimensions prescribed by PBP then it follows that other forms of development are permitted to could occur - simply because – those types of development require less distance to the hazard.

For example, where a special protection development may require a 60m APZ it is the case that a normal residential dwelling would only require an APZ dimension between 24-29m from the same forest vegetation community (when on a level slope).

The reason is simple. The Special Protection Development uses a much tougher formulae to determine the APZ dimension as compared to a residential dwelling. Equally, a commercial development would require a much reduced APZ dimension then the dwelling because there is no overnight accommodation permitted in commercial facilities – so the risk is less and evacuation is simpler.

Then there is the building construction requirements. In terms of building construction, the Special Protection Development must be constructed to BAL 12.5 of *AS3959 construction of buildings in bushfire prone areas*, whilst a residential dwelling can be constructed to a higher classification such as BAL 29 or even BAL 40 or BAL FZ if there is no subdivision involved.

Therefore, in conclusion, the APZ for the proposed ILU development in Lot 21 may have a combination of other development types within the proposed APZ – as long as those APZ dimensions are complying to PBP from either a *deemed to satisfy* approach or a *performance based solution* approach.

#### 3.2 Building protection

Building construction will accord with BAL 12.5 of AS3959 of AS3959.

#### 3.3 Hazard management

Hazard management will occur within Lot 21, Lot 2 and in Council's existing APZ managed land to the east (Lot 19) in accord with;

- PBP 2019 Appendix 4 and
- Standards for Asset Protection Zones (RFS, 2019)

Works will be undertaken by staff or contractors on a rotational basis in accord with a formal bushfire management plan for the whole of Lot 21.

#### 3.4 Access

Access will comply with PBP 2019 Table 6.8.2.

The internal road (6m) layout provides recirculation routes from the 8m wide perimeter road – see Figure 3.1 which creates a new access and egress road. Internal roads are dead end due to slope at the northern end of the rod sections. Arising from the passive land use being proposed external parking on the 8m wide perimeter road is not required. Table 3.2 provides detail regarding vehicular access required by the RFS.



Figure 3.1 – Access design

#### Table 3.2 – Performance criteria for vehicular access (PBP guidelines pg. 57)

*Intent of measures:* to provide safe operational access for emergency services personnel in suppressing a bush fire, while residents are accessing or egressing an area.

Performance criteria	Acceptable solutions to RFS	Compliance comments
	SFPP access roads are two-wheel drive, all-weather roads	Complies

Performance criteria	Acceptable solutions to RFS	Compliance comments
Firefiahting vehicles are provided		
with safe, all-weather access to structures and hazard vegetation	access is provided to all structures	Complies
	access roads must provide suitable turning areas in accordance with Appendix 3; and	Complies
	one way only public access roads are no less than 3.5 metres wide and have designated parking bays with hydrants located outside of these areas to ensure accessibility to reticulated water for fire suppression.	Complies
	traffic management devices are constructed to not prohibit access by emergency services vehicles	Complies
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.	Complies
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	Complies
	hydrants are provided in accordance with the relevant clauses of AS2419.1:2005; 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	Complies
perimeter access roads are designed to allow safe access and egress for firefighting vehicles while occupants are evacuating as well as providing a safe operational environment for emergency service personnel during firefighting and emergency management on the interface	there are two-way sealed roads; minimum 8m carriageway width kerb to kerb; parking is provided outside of the carriageway width; hydrants are to be located clear of parking areas; there are through roads, and these are linked to the internal road system at an interval of no greater than 500m; curves of roads have a minimum inner radius of 6m; the maximum grade road is 15 degrees and average grade of not more than 10 degrees; the road crossfall does not exceed 3 degrees; and a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided.	Complies
non-perimeter access roads are designed to allow safe access and egress for firefighting vehicles while occupants are evacuating	minimum 5.5m carriageway width kerb to kerb; parking is provided outside of the carriageway width; hydrants are located clear of parking areas; there are through roads, and these are linked to the	Complies

Performance criteria	Acceptable solutions to RFS	Compliance comments
	internal road system at an interval of no greater than 500m;	
	curves of roads have a minimum inner radius of 6m;	
	the maximum grade road is 15 degrees and average grade of not more than 10 degrees; the road crossfall does not exceed 3 degrees;	
	a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided	

#### 3.5 Water supplies

Town reticulated water supply is available to the proposed development in the form of an underground reticulated water system. Table 3.3 outlines the proposal's compliance with the performance criteria for reticulated water supply.

#### Table 3.3 – Performance criteria for reticulated water supplies (PBP guidelines pg. 59)

**Intent of measures:** to provide adequate services of water 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 a building.

Performance criteria	Acceptable solutions	Complies
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	Complies
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	Complies
flows and pressure are appropriate	fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2005	Can be a condition of consent
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	Can be a condition of consent
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;	Can be a condition of consent

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);	
unchatry at a groups is previded at all times.	
unobstructed access is provided at an times,	
with adequate shielding for the protection of	
firefighters: and	
Jirejighters, und	
underground tanks are clearly marked	
tanks on the hazard side of a building are	
provided with adequate shielding for the	
protection of firefighters:	
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	
snall be 19mm internal diameter; and <b>fire hose reels are</b>	
constructed in accordance with AS/NZS 1221:1997, and	
installed in accordance with the relevant clauses of AS	
2441:2005	

#### 3.6 Gas

Table 3.4 outlines the required performance criteria for the proposal's gas supply.

Performance criteria	Acceptable solutions Complies	
Location of gas services will not lead to the ignition of surrounding bushland land or the fabric of buildings.	Reticulated or bottled gas bottles are to be installed and maintained in accordance with AS1596 and the requirements of relevant authorities. Metal piping is to be used.	Can be made a condition of consent.

## Table 3.4 – Performance criteria for gas supplies (PBP guidelines pg. 60)

All fixed gas cylinders are to be kept clear of flammable materials and located on the non-hazard side of the development.	Can be r condition consent.	made	a of
If gas cylinders are to be kept close to the building the release valves must be directed away from the building and away from any combustible material, so that they do not act as a catalyst to combustion.	Can be r condition consent.	made	a of
Polymer sheathed flexible gas supply lines to gas meters adjacent to buildings are not to be used.	Can be r condition consent.	made	a of

# 3.7 Electricity

Table 3.5 outlines the required performance criteria for the proposal's gas supply.

Performance criteria	Acceptable solutions	Complies
location of electricity	where practicable, electrical transmission lines are	
services limits the	underground;	
possibility of ignition of		
surrounding bush land or	where overhead, electrical transmission lines are proposed	Yes
the fabric of buildings.	as follow:	
	<ul> <li>lines are installed with short pole spacing (30m),</li> </ul>	
	• unless crossing guilles, gorges or riparian areas;	
	and	
	no part of a tree is closer to a power line than the distance	Yes
	set out in accordance with the specifications in ISSC3	
	Guideline for Managing Vegetation Near Power Lines.	
location and design of	reticulated or bottled gas is installed and maintained in	Can be made a
gas services will not lead	accordance with AS/NZS 1596:2014 and the requirements	condition of
to ignition of	of relevant authorities, and metal piping is used;	consent
the fabric of buildings	all fixed aas culinders are kent clear of all flammable	
the jubile of buildings	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	
	away not act as a catalyst to combustion:	
	polymer-sheathed flexible gas supply lines to gas meters	
	adjacent to buildings are not to be used;	
	above-ground gas service pipes external to the building are	
	material, so they do	

Table 3.5 – Performance criteria for gas supplies (PBP guidelines pg. 60)

## 3.8 Emergency and evacuation planning

Table 3.6 outlines the required performance criteria for the proposal's emergency procedures

Performance criteria	Acceptable solutions	Complies
A Bush Fire Emergency Management and Evacuation Plan is prepared	Bush Fire Emergency Management and Evacuation Plan is prepared consistent with the: The NSW RFS document: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; NSW RFS Schools Program Guide; Australian Standard AS 3745:2010 Planning for emergencies in facilities; and Australian Standard AS 4083:2010 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.	can be made a condition of consent.
appropriate and adequate management arrangements are established for consultation and implementation of the Bush Fire Emergency Management and Evacuation Plan	an Emergency Planning Committee is established to consult with residents (and their families in the case of aged care accommodation and schools) and staff in developing and implementing 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	can be made a condition of consent.

## Table 3.6 – Performance criteria for emergency and evacuation planning

#### (PBP guidelines pg.60)



## 4.1 Conclusion

A bushfire assessment has been undertaken for the development project within Lot 21 in accordance with the controls and principles identified within *Planning for bushfire protection 2019*. The development proposal is a master plan approach to facilitate the development of Independent Living Units and the construction of roads to service the zone.

The development will occur within Lot 21 adjacent to the existing Gilead Retirement Village, located at Lot 2 DP 1065919, supports an approved independent living seniors housing and associated support services.

The assessment has been determined using an alternate solution by modelling the bushfire threat using *Flamesol* software. The relevant results, as shown on Table 2.3 herein, indicate the proposed asset protection zones provide the required level of defendable space in order to achieve less than  $10 \ kWm^2$  impact upon the residential structures; as required by PBP 2019.

All other bushfire protection measures, as required by PBP 2019, have been considered in reference to the performance standards of PBP 2019 and fully comply with those standards.

The following recommendations should be made conditions of development consent.

#### 4.2 Recommendations

**Recommendation 1** – At the commencement of building works and in perpetuity the APZ, as depicted in Schedule 1 – Bushfire Protection Measures prepared by *Travers bushfire & ecology* ref: 19HOPE002, dated 29/11/21, shall be managed as an inner protection area (IPA) as outlined within Appendix 4 of *Planning for Bush Fire Protection 2019*.

**Recommendation 2** – A minimum 3.2m high radiant heat shield made of non-combustible materials shall be constructed within 1m of the northern property boundary; whilst a 4.0m high radiant heat shield made of non-combustible materials shall be constructed on the western APZ boundary to the physical extent as shown on Schedule 1 of the *Travers bushfire & ecology* plan dated 30 September 2020.

**Recommendation 3** – The provision of water, electricity and gas shall comply with Section 6.8.3 of *PBP 2019.* 

**Recommendation 4** – The proposed perimeter access road on the northern and western aspect shall be constructed to 8.0m in width as per PBP 2019. Parking space, if required, would be additional space to the 8m width.

**Recommendation 5** – Internal road access can be constructed to 5.5m wide as provided by PBP 2019. Parking spaces, should they be required on the roadway, would require additional road width.

**Recommendation 6** – The existing Bush Fire Emergency Management and Evacuation Plan shall be amended to deal with the development; and also be prepared or amended to be consistent with *Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan December 2014* and *Australian Standard AS3745 2010 Planning for Emergencies in Facilities.* 

**Recommendation 7** – The proposed buildings shall comply with Sections 3 and 5 (BAL 12.5) Australian Standard AS3959-2018 Construction of buildings in bush fire-prone areas or NASH Standard (1.7.14 updated) National Standard Steel Framed Construction in Bushfire Areas – 2014 as appropriate and section A3.7 Addendum Appendix 3 of Planning for Bush Fire Protection 2019.

#### REFERENCES

- Australian Building Codes Board (2019) *National Construction Code* Class 1 and Class 10 Buildings Housing Provisions Volume 2
- Chan, K.W. (2001) The suitability of the use of various treated timbers for building constructions in bushfire prone areas. Warrington Fire Research
- Councils of Standards Australia AS3959 (2009) Australian Standard Construction of buildings in bushfire-prone areas
- Keith, David (2004) Ocean Shores to Desert Dunes The Native Vegetation of New South Wales and the ACT. The Department of Environment and Climate Change
- Rural Fire Service (2006) Planning for bushfire protection a guide for councils, planners, fire authorities and developers. NSW Rural Fire Service

Rural Fire Service (2006) - Bushfire Attack Software on RFS web site

Tan, B., Midgley, S., Douglas, G. and Short (2004) - A methodology for assessing bushfire attack. RFS Development Control Service

# Plan of Bushfire Protection Measures S1





# 4.0\_CONCEPTUAL SITE PLANNING

LOT 21 MOUNT GILEAD ESTATE DECEMBER 2021























# 4.11 PEDESTRIAN ACCESS PLAN



ACCESS TO AND FROM EXISTING CLUBHOUSE

ACCESS FROM EXISTING MOUNT GILEAD ESTATE STREET NETWORK







# 4.14 BUILDING SEPERATION



**BUILDING SEPERATION PLAN** 1:1000 @ A3





# 4.15 SITE SECTIONS AA + BB



R1	
	ROOF
	LEVEL 3 o
	LEVEL 2 o
	LEVEL 1 o
	GROUND
	LOWER 1 o
	LOWER 2 o
	LOWER 3 o
	BASEMENT 1 o
	BASEMENT 2 o



# Surveyors long sections





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SECTION 1

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Client: AUSTRALIAN RETIREMENT HOLDINGS	Ratio (A3) : 1:400 NATURAL		John M. Daly & As A.B.N. 880	sociates PTY LTD 51977989	Project :	LOT 21 IN DP
Origin of Levels :	Date of Survey : 13/7/2020	JND	Surveying Engineering Project Management Licensed Water Service Co ordi	nators		SECTION 1
	Designed By : T.H.	Development Consultants	32 Iolanthe Street	PH. (02) 4625 5055 FAX (02) 4628 2013		econom i
Datum : AHD	Approved : T.H. 22/7/2020		CAMPBELLTOWN N.S.W. 2560	email: admin@jmd.com.au	Locality : GILEAD	L.G.A. : CAMPBELLTOWN



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ISSUE C\_15-02-2021\_SHEET NUMBERING UPDATED ISSUE B\_26-10-2020\_SECTION REMOVED, SECTION 2 ADDED & REGISTER UPDATED ISSUE A\_16-10-2020\_SHEET ADDED

Client: AUSTRALIAN RETIREMENT HOLDINGS	Ratio (A3) : 1:400 NATURAL			
Origin of Levels :	Date of Survey : 13/7/2020			
	Designed By : T.H.			
Datum : AHD	Approved : T.H. 22/7/2020			



John M. Daly & As A.B.N. 880!	sociates PTY LTD 51977989	Project :	LOT 21 IN DP10
Surveying Engineering Project Management Licensed Water Service Co ordir 32 Iolanthe Street	nators PH. (02) 4625 5055 FAX (02) 4628 2013		SECTION 2
P.O. BOX 25 CAMPBELLTOWN N.S.W. 2560	email: admin@jmd.com.au	Locality : GILEAD	L.G.A. : CAMPBELLTOWN

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SECTION 4

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Client: AUSTRALIAN RETIREMENT HOLDINGS	Ratio (A3) : 1:400 NATURAL			
Origin of Levels :	Date of Survey : 13/7/2020			
	Designed By : T.H.			
Datum : AHD	Approved : T.H. 22/7/2020			



John M. Daly & Associates PTY LTD A.B.N. 88051977989		Project :	LOT 21 IN DP1
Surveying Engineering Project Management Licensed Water Service Co ordin 32 Iolanthe Street	nators PH. (02) 4625 5055 FAX (02) 4628 2013		SECTION 4
P.O. BOX 25 CAMPBELLTOWN N.S.W. 2560	email: admin@jmd.com.au	Locality : GILEAD	L.G.A. : CAMPBELLTOWN



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CHAINAGE	-68.271	-60	-45	- 30	- - -	-0.946	0	7.088	9.889	14.23	18.964	19.972	21.372	21.989	26.729	30	32.185	33.081	35.097	45		47.58 51.366

SECTION 5

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ISSUE A\_15-02-2021\_SHEET ADDED

Client: AUSTRALIAN RETIREMENT HOLDINGS Ratio (A3) : 1:400 NATURAL Date of Survey : 13/7/2020 Origin of Levels : Designed By : T.H. Approved : T.H. 15/02/2021 Datum : AHD



John M. Daly & As A.B.N. 880	sociates PTY LTD 51977989	Project :	LOT 21 IN DP1
Surveying Engineering Project Management Licensed Water Service Co ordin 32 Iolanthe Street	nators PH. (02) 4625 5055 FAX (02) 4628 2013		SECTION 5
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