

# **BUSHFIRE ASSESSMENT REPORT**

ALTERATIONS
WINDARRA LODGE
16 PLUM PINE ROAD
SMIGGIN HOLES
KOSCIUSZKO NATIONAL PARK



MARCH 2020 Project: 45-19

# **Dabyne Planning Pty Ltd**

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# **GLOSSARY**

APZ Asset Protection Zone

AS 3959-2009 Australian Standard 3959-2018: Construction of buildings in bushfire

prone areas

**BCA** Building Code of Australia

**BFSA** Bush Fire Safety Authority

**CC** Construction Certificate

**DA** Development Application

**EP&A Act** Environmental Planning Assessment Act, 1979

IPA Inner Protection Area

KNP Kosciuszko National Park

**kW/m**<sup>2</sup> kilowatts per square metre (being a measure of radiant heat)

**PBP** Planning for Bushfire Protection 2019

**RF Act** Rural Fires Act 1997

**RFS** NSW Rural Fire Service

**SFPP** Special Fire Protection Purpose

### 1. INTRODUCTION

### 1.1 Purpose

Dabyne Planning Pty Ltd has been engaged to undertake a Bushfire Assessment Report to accompany a Development Application for external alterations, comprising of repairs and replacement works to an existing club lodge.

The report has been prepared in accordance with Section 4.47 of the Environmental Planning and Assessment Act, 1979 (EP&A Act, 1979), and Section 100B of the NSW Rural Fires Act, 1997 (RF Act, 1997) and based on the published Planning for Bushfire Protection 2019 Guidelines (PBP).

## 1.2 Site Description & Proposal

The application relates to Windarra Lodge, a club lodge located at 16 Plum Pine Road, Smiggin Holes, within Kosciuszko National Park. The site is legally described as Lot 23 DP 756697.

The site comprises an existing club lodge used for tourist accommodation.

The proposal seeks consent to undertake repairs and replacement work including replacement of the existing hardwood timber cladding with bushfire resistant hardwood timber cladding and replacement of timber deck with bushfire resistant hard timber deck. The replacement deck is the same size and configuration as the existing deck.

All of the proposed works are external to the building and within the existing building.

The subject site is illustrated in context with the locality in figures 1 & 2 below:



Figure 1: Context of the site within the locality



Figure 2: Location of the subject site in relation to the immediate locality

The following photos identify the existing lodge and surrounding environment:



Figure 3: Photo of the eastern side of the lodge, including its car park



Figure 4: Photo of the eastern side of the lodge



Figure 5: Photo of the vegetation towards the north



Figure 6: Photo of the northern elevation of the lodge



Figure 7: Photo of the western and northern elevation of the lodge and the deck to be replaced



Figure 8: Photo of the western elevation of the lodge and the deck to be replaced



Figure 9: Photo of the western elevation of the lodge



Figure 10: Photo of the southern elevation of the lodge



Figure 11: Photo of eastern side of the lodge



Figure 12: Photo of the land to the east of the lodge

### 1.3 Bushfire Prone Land

The subject site is located wholly within a buffer area to the bushfire prone vegetation as extracted from the NSW Department of Planning, Industry & Environment Planning Portal website as shown in figure 13 below. The development is therefore subject to S.100B of the NSW Rural Fires Act, 1997.



Figure 13: Bushfire Prone Land map for Windarra Lodge

# 2. LEGISLATION

# 2.1 NSW Environmental Planning and Assessment Act 1979 and Rural Fires Act 1997

As identified above, the subject site is located within a designated bushfire-prone area and as the development is for the purpose of 'tourist accommodation', the development is classed as being for a 'Special Fire Protection Purpose'.

The development application is therefore categorised as an Integrated Development under S.4.46 of the EP&A Act, 1979 and therefore requires a Bushfire Safety Authority from the NSW Rural Fire Service under S.100B of the RF Act, 1997.

Clause 46 of the Rural Fires Regulation 2013 sets out the matters that must be assessed in an application for a Bush Fire Safety Authority including a description of the property, classification of the vegetation, slope assessment, identification of significant environmental features, and details of threatened species and Aboriginal relic or place.

Clause 46(1)(g) of the Rural Fires Regulation 2013 specifies that a bushfire assessment for a proposed development must address the following matters:

- (i) the extent to which the development is to provide for setbacks, including asset protection zones,
- (ii) the siting and adequacy of water supplies for fire fighting,
- (iii) the capacity of public roads in the vicinity to handle increased volumes of traffic in the event of a bush fire emergency,
- (iv) whether or not public roads in the vicinity that link with the fire trail network have two-way access,
- (v) the adequacy of arrangements for access to and egress from the development site for the purposes of an emergency response,
- (vi) the adequacy of bush fire maintenance plans and fire emergency procedures for the development site,
- (vii) the construction standards to be used for building elements in the development, and (viii) the adequacy of sprinkler systems and other fire protection measures to be incorporated into the development.'

This Bushfire Assessment Report has been undertaken in accordance with the requirements stipulated above, where considered relevant in context of the proposed development.

# 2.2 Planning for Bushfire Protection 2019

The NSW Rural Fire Service 'Planning for Bushfire Protection, 2019: A Guide for Councils, Planners, Fire Authorities and Developers' applies to the proposed development as it was adopted on the 1 March 2020.

The subject site is located within the Perisher Range Resorts, which is located within the NSW Alpine Resorts as discussed on page 53 of PBP.

Under PBP, a different 1:50 fire weather scenario has been determined for the Alpine Resorts, being FFDI 50.

#### **METHODOLOGY** 3.

#### 3.1 Site Inspection

A site inspection was undertaken by Dabyne Planning Pty Ltd in October 2019, to determine the potential bushfire risks associated with the site. The guidelines for bushfire risk assessment as set out in PBP were used to determine these potential bushfire risks.

#### 3.2 **Vegetation Communities**

The vegetation and plant communities within 140m of the site were determined by undertaking a site inspection and consulting PBP and the vegetation types identified in 'Ocean Shores to Desert Dunes', by Kieth (2004).

The classification under David Keith's 'Ocean Shores to Desert Dunes' (used in PBP) were then converted to the 'Sprect' classifications using Table A3.5.1 in the Appendix 3 Addendum.

This vegetation classification was also informed by consulting the plant community maps identified in the Kosciuszko Resorts Vegetation Assessment 2002, prepared by Ecology Australia, in association with NGH Environmental, for Planning NSW (now Department of Planning & Environment).

#### 3.3 Slope

The slope assessment has been based on the topographical contour lines sourced from the Department of Lands mapping and on-site assessment.

Slope over a distance of at least 100m from the building footprint on the development site towards the vegetation communities that constitute the predominant hazard has been considered.

The gradient that will most significantly influence the fire behaviour will be used for the bush fire attack assessment.

#### **VEGETATION CLASSIFICATION & SLOPE ASSESSMENT** 4.

#### 4.1 **Vegetation & Slope Classification**

The predominant vegetation in and around the subject site and wider resort is Sub-alpine Woodland, which is classified under Keith, 2004 as Grassy woodlands (Woodlands) formation.

The AUSLIG (1990) Pictorial Analysis confirms that the vegetation on site is Woodlands as also converted from Keith below:

David Keith's <i>Ocean Shores to Desert Dunes</i>	AUSLIG (1990) Pictorial Analysis (AS3959-2009)	
Forests (Wet & Dry Sclerophyll)		
Pine Plantations	Forest	
Forested Wetlands		
Woodlands (Grassy, Semi-Arid)	Woodland	
Tall Heath (Scrub)	Same	
Freshwater Wetlands	Scrub	
Short Heath (Open Scrub)	Shrubland	
Arid Shrubland	Mallee/Mulga	
Alpine Complex (Sedgelands)	Tussock Moorland	
Rainforest	Rainforest	
Grassland	Grassland	

This is further supported by the vegetation mapping undertaken by Ecology Australia in 2002, as shown in figure 14 below which shows that the light yellow areas are highly disturbed (no dominant vegetation communities) and that the green (light and dark) vegetation community is Tall Alpine Heath with and without Eucalypts, a Sub-alpine Woodland vegetation community.



Figure 14: Vegetation plan showing the location of vegetation communities in relation to the existing building (map source: NSW Dept of Planning)

The unmanaged native vegetation to the north as illustrated in figure 15 below is considered to have the most influence in the event of a bushfire.



Figure 15: Aerial view demonstrating the location of the vegetation that would have the most influence in the event of a bushfire

The distance of the closest unmanaged vegetation to the north is 15m from the proposed external alterations, with this vegetation located upslope/flat.

#### SIGNIFICANT ENVIRONMENTAL FEATURES 5.

The proposed external alterations are located within the existing building footprint with no impact on native vegetation and therefore an assessment in respect to threatened species, populations, endangered ecological communities or critical habitat is not required to be undertaken. Furthermore an assessment of Aboriginal heritage is also not warranted.

#### **BUSHFIRE ASSESSMENT** 6.

#### 6.1 Special Fire Protection Purpose Developments

### 6.1.1 Minor Development in SFPP Facilities

In accordance with Section 6.5 of PBP, minor non-structural works such as the replacement of cladding, balustrades and structural foundations 'do not have any influence on potential bush fire impacts and the bush fire protection of the building. For this reason, the NSW RFS does not consider that a BFSA is necessary for the development types listed above. Wherever applicable, the building elements concerned will need to comply with the requirements of AS 3959 or NASH Standard under the NCC'.

Given that these types of works do not have any influence on potential bush fire impacts and do not require a BFSA, then they should not be subject to the Integrated Development provisions of the EP&A Act, 1979 and therefore not require a BFSA under S.100B of the Rural Fires Act, 1997.

### 6.1.2 Alpine Resorts

The specific objectives that apply to SFPP infill development in the alpine resort areas are as follows:

- provide an appropriate defendable space;
- provide a better bush fire protection outcome for existing structures (e.g. via ember protection measures);
- ensure new building work complies with the construction standards set out in AS *3959*:
- to ensure ongoing management and maintenance responsibilities are in place where APZs are proposed outside of the sub lease or leasehold area;
- written consent from the land managers is provided for all proposed works outside of the sub lease or leasehold area;
- proposed APZs outside of the sub lease or leasehold area are supported by a suitable legal mechanism to ensure APZs are managed under a binding legal agreement in perpetuity;
- ensure building design and construction standards enhance the chances of occupant and building survival; and
- provide safe emergency evacuation procedures.

Any additional construction requirements should be commensurate with the following:

- the scope of the proposed works, including any increase in size and footprint of the building;
- any additional capacity for the accommodation of guests and/or staff on site; and
- the cost associated with the proposed upgrade of any building.

The NSW RFS has an expectation that a better bush fire outcome is achieved where new development is proposed in association with existing facilities.

The proposed repairs and replacement of the timber deck and cladding with bushfire resistant timber will result in a better bush fire outcome.

### 6.2 Standards for Bush Fire Protection Measures for Special Fire **Protection Purpose Developments**

## 6.2.1 Asset Protection Zones (APZs) and building construction

Intent of measures: to provide sufficient space for fire fighters and other emergency services personnel, ensuring radiant heat levels permit operations under critical conditions of radiant heat, smoke and embers, while supporting or evacuating occupants.

An assessment of the proposal in accordance with the performance criteria and acceptable solutions for APZs and construction for SFPP development in accordance with Table 6.8a has been provided below.

APZs:			
Performance Criteria The intent may be achieved where:	Acceptable Solutions	Can Comply?	Comments
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.	Х	See discussion below.
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 provided in	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;	х	See discussion below.
perpetuity.	<ul> <li>APZ are wholly within the boundaries of the development site; and</li> </ul>	Х	See discussion below.
	other structures located within the APZ need to be located further than 6m from the refuge building.	N/A	No other structure proposed.
VARIATIONS:			No variations have been afforded to the Alpine Resorts.
Landscaping:			
> landscaping is designed and managed to minimise flame	landscaping is in accordance with Appendix 4; and	N/A	Not applicable.
contact and radiant heat to buildings, and the potential for wind-driven embers to cause ignitions.	fencing is constructed in accordance with section 7.6.	N/A	No fencing is proposed.
Construction Standards	:		

> the proposed building can	a construction level of BAL-12.5	<b>√</b>	The proposed repairs and
withstand bush fire attack in	under AS 3959 or NASH Standard		replacement works can achieve
the form of wind, embers,	and section 7.5 of PBP is applied.		compliance with BAL-12.5.
radiant heat and flame			
contact.			

### APZ:

The minimum APZ for Sub-Alpine Woodland with an effective slope of Up slopes and flat is 67m to the predominant vegetation formation to the north.

This is in accordance with Table A1.12.1 in PBP, 2019, as provided below:

**Table A1.12.1** Minimum distances for APZs - SFPP developments (≤10kW/m², 1200K)

	EFFECTIVE SLOPE				
KEITH VEGETATION FORMATION	Up slopes and flat	>0*-5*	>5*-10*	>10*-15*	>15*-20*
	Distance	(m) from the ass	et to the predom	inant vegetation f	ormation
Rainforest	38	47	57	69	81
Forest (wet and dry sclerophyll) including Coastal Swamp Forest, Pine Plantations and Sub-Alpine Woodland	67	79	93	100	100
Grassy and Semi-Arid Woodland (including Mallee)	42	50	60	72	85
Forested Wetland (excluding Coastal Swamp Forest)	34	42	51	62	73
Tall Heath	50	56	61	67	72
Short Heath	33	37	41	45	49
Arid-Shrublands (acacia and chenopod)	24	27	30	34	37
Freshwater Wetlands	19	22	25	28	30
Grassland	36	40	45	50	55

Unlike PBP, 2006 where the Alpine Resorts were exempt from providing a minimum distance for APZ's, PBP 2019 includes the above table with no exemption or variation afforded.

The existing lodge is not able to comply with A1.12.1 with a 67m APZ not able to be achieved.

In fact, most if not all buildings within the Perisher Range Resorts would unlikely to be able to achieve compliance with Table A1.12.1.

As the proposal is for only repairs and replacement works that are considered to be minor works to an SFPP development, compliance with table A1.12.1 is not considered necessary.

### This is because:

- > Minor non-structural works such as the replacement of cladding, balustrades and structural foundations 'do not have any influence on potential bush fire impacts and the bush fire protection of the building'in accordance with Section 6.5 of PBP.
- > The proposed repairs and replacement works will result in a better bushfire risk outcome, achieving the objectives for the Alpine Resorts under Section 6.6 of PBP.

### 6.2.2 Access

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.

An assessment of the proposal in accordance with the performance criteria and acceptable solutions for APZs and construction for SFPP development in accordance with Table 6.8b has been provided below.

Access:			
Performance Criteria The intent may be achieved where:	Acceptable Solutions	Can Comply?	Comments
Firefighting vehicles are provided with safe, all-weather access to structures	SFPP access roads are two-wheel drive, all-weather roads;	<b>√</b>	Access road is two-wheel drive and all-weather, when not impeded by snow.
and hazard vegetation.	> access is provided to all structures;	N/A	Not relevant to the proposed works.
	> traffic management devices are constructed to not prohibit access by emergency services vehicles;	N/A	Not relevant to the proposed works.
	> access roads must provide suitable turning areas in accordance with Appendix 3; and	N/A	Not relevant to the proposed works.
	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.	N/A	Not relevant to the proposed works.
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.	N/A	Not relevant to the proposed works.
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;	N/A	Not relevant to the proposed works.
	hydrants are provided in accordance with the relevant clauses of AS 2419.1:2005; and	N/A	Not relevant to the proposed works.
	there is suitable access for a Category 1 fire appliances to within 4m of the static water supply where no reticulated supply is available.	N/A	Not relevant to the proposed works.

### 6.2.3 Services - Water, gas & electricity

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.

An assessment of the proposal in accordance with the performance criteria and acceptable solutions for APZs and construction for SFPP development in accordance with Table 6.8c has been provided below.

Performance Criteria The intent may be achieved where:	Acceptable Solutions	Can Comply?	Comments
an adequate water supply for firefighting purposes is installed and maintained.	> reticulated water is to be provided to the development, where available; or	<b>√</b>	Reticulated water is available.
	a 10,000 litres minimum static water supply for firefighting purposes is provided for each occupied building where no reticulated water is available.	N/A	Not applicable.
water supplies are located at regular intervals.  the water supply is accessible	fire hydrant spacing, design and sizing comply with the relevant clauses of AS 2419.1:2005;	N/A	Not relevant to the proposed works.
and reliable for firefighting operations.	<ul> <li>hydrants are not located within any road carriageway; and</li> </ul>	N/A	Not relevant to the proposed works
oper asions.	reticulated water supply to SFPPs uses a ring main system for areas with perimeter roads.	N/A	Not relevant to the proposed works
Flows and pressure are appropriate.	fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2005	N/A	Not relevant to the proposed works
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.	N/A	Not relevant to the proposed works
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;	N/A	Not applicable.
	ball valve and pipes are adequate for water flow and are metal;	N/A	Not applicable.
	supply pipes from tank to ball valve have the same bore size to ensure flow volume;	N/A	Not applicable.
	underground tanks have an access hole of 200mm to allow tankers to refill direct from the tank;	N/A	Not applicable.

	> a hardened ground surface for truck access is supplied within 4m of the access hole;	N/A	Not applicable.
	> above-ground tanks are manufactured from concrete or metal;	N/A	Not applicable.
	raised tanks have their stands constructed from non-combustible material or bush fire-resisting timber (see Appendix F AS 3959);	N/A	Not applicable.
	<ul><li>unobstructed access is provided at all times;</li></ul>	N/A	Not applicable.
	> tanks on the hazard side of a building are provided with adequate shielding for the protection of firefighters; and	N/A	Not applicable.
	<ul><li>underground tanks are clearly marked,</li></ul>	N/A	Not applicable.
	all exposed water pipes external to the building are metal, including any fittings;	N/A	Not applicable.
	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 shall be 19mm internal diameter; and	N/A	Not applicable.
	➤ fire hose reels are constructed in accordance with AS/NZS 1221:1997 Fire hose reels, and installed in accordance with the relevant clauses of AS 2441:2005 Installation of fire hose reels.	N/A	Not applicable.
Electricity Services:			
location of electricity services limits the possibility of ignition	<ul> <li>where practicable, electrical transmission lines are underground;</li> </ul>	<b>√</b>	Electricity supply is provided underground.

of surrounding bush land or the fabric of buildings.  Gas Services:	<ul> <li>where overhead, electrical transmission lines are proposed as follow:         <ul> <li>lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas; and</li> <li>no part of a tree is closer to a power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines.</li> </ul> </li> </ul>	N/A	Not applicable.
location and design of gas services will not lead to ignition of surrounding bushland or the fabric of buildings.	reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used;	N/A	Not relevant to the proposed works
	> all fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side;	N/A	Not relevant to the proposed works
	<ul> <li>connections to and from gas cylinders are metal;</li> </ul>	N/A	Not relevant to the proposed works
	if gas cylinders need to be kept close to the building, safety valves are directed away from the building and at least 2m away from any combustible material, so they do not act as a catalyst to combustion;	N/A	Not relevant to the proposed works
	> polymer-sheathed flexible gas supply lines to gas meters adjacent to buildings are not to be used; and	N/A	Not relevant to the proposed works
	above-ground gas service pipes external to the building are metal, including and up to any outlets.	N/A	Not relevant to the proposed works

# 6.2.4 Emergency Management Planning

Intent of measures: to provide suitable emergency and evacuation arrangements for occupants of SFPP developments.

Emergency Management:				
Performance Criteria	Acceptable Solutions	Can	Comments	
The intent may be achieved where:		Comply?		

➤ a Bush Fire Emergency  Management and Evacuation  Plan is prepared.	<ul> <li>➤ Bush Fire Emergency Management and Evacuation Plan is prepared consistent with the:         <ul> <li>The NSW RFS document: A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan;</li> <li>NSW RFS Schools Program Guide;</li> <li>Australian Standard AS 3745:2010 Planning for emergencies in facilities; and</li> <li>Australian Standard AS 4083:2010 Planning for emergencies – Health care facilities (where applicable).</li> </ul> </li> <li>➤ the Bush Fire Emergency Management and Evacuation Plan should include planning for the early</li> </ul>	N/A	Individual Bush Fire Emergency Management and Evacuation Plans for each lodge is not a practical or a logical requirement.  To have over 150 lodges having individual evacuation plans, with occupants going to all different locations is not considered appropriate.  Resort or locality based Evacuation Plans prepared/implemented by NPWS would be a much more practical and safer outcome.
appropriate and adequate management arrangements are established for consultation and implementation of the Bush Fire Emergency Management and Evacuation Plan.	relocation of occupants.  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.	N/A	Not relevant to the proposed works  Not relevant to the proposed works

## 7. CONCLUSION

As identified above, the proposed development comprises of repairs and replacement works.

According to PBP, 2019 minor non-structural works such as the replacement of cladding, balustrades and structural foundations do not have any influence on potential bush fire impacts and the bush fire protection of the building. For this reason, the NSW RFS does not consider that a BFSA is necessary for this type of development.

Contrary to the provisions under PBP, 2019, the exemptions afforded under clause 45 of the Rural Fires Regulations, 2013 were not amended as part of the implementation of the implementation of PBP, 2019 on the 1 March 2020. Therefore, a BFSA may still to be required for minor developments comprising of repairs and replacement works to a SFPP development, contrary to PBP, 2019.

In accordance with the specific provisions for the Alpine Resorts, the NSW RFS has an expectation that a better bush fire outcome is achieved where new development is proposed in association with existing facilities.

The proposed repairs and replacement of the timber deck and cladding with bushfire resistant timber will result in a better bush fire outcome, which therefore achieves the objectives as set out for the Alpine Resorts.

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