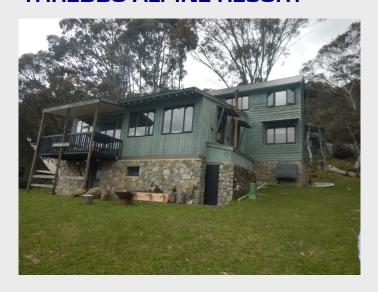


BUSHFIRE ASSESSMENT REPORT

ADDITIONS AND ALTERATIONS FOR THE CONVERSION OF A LODGE INTO THREE (3) SELF CONTAINED APARTMENTS SNOWGUMS LODGE LOT 749, BRINDLE BULL CLOSE THREDBO ALPINE RESORT



JULY 2020 Project: 42-19

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CONTENTS

Glossary

1		oduction	3
	1.1	Purpose	3
	1.2 1.3		3 6
	1.3	Bushille Prone Land	О
2	Legi	slation	8
	2.1	NSW Environmental Planning and Assessment Act 1979 and Rural Fires Act 1997	8
	2.2	Planning for Bushfire Protection 2019	8
3	Met	hodology	9
	3.1	Site Inspection	9
	3.2	Vegetation Communities	9
	3.3	Slope	9
4	Veg	etation Classification and Slope Assessment	10
	4.1	Vegetation & Slope Classification	10
5	Sigr	nificant Environmental Features	12
6	Bus	hfire Assessment	13
	6.1	Special Fire Protection Purpose Developments	13
		6.1.1 Minor Developments in SFPP Developments	13
		6.1.2 Alpine Resorts	13
	6.2	Standards for Bush Fire Protection Measures for Special Fire Protection Purpose Developments	13
		6.2.1 Asset Protection Zones (APZs) and building construction	13
		6.2.2 Access	16
		6.2.3 Services - Water, gas & electricity	17
		6.2.4 Emergency Management Planning	19
7	Con	clusion	22

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/m² 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 additions and alterations to convert a commercial lodge to three (3) self-contained apartments used for tourist accommodation.

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 a property known as 'Snowgums Lodge' located on Brindle Bull Close, Thredbo. The property is legally described as Lot 749 DP 1119757.

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

The purpose of the development is to change the use of the building from a commercial lodge to self-contained apartments used for tourist accommodation.

This will allow for the existing lodge, comprising of four (4) guest bedrooms and the managers quarters to be converted to three (3) self-contained apartments.

This will be facilitated by undertaking additions and expanding the building footprint to the west and to the south-east, whilst retaining the central form of 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 north-west elevation of the lodge



Figure 5: Photo of the north-east elevation of the building from Brindle Bull Close, with the large trees to be removed



Figure 7: Photo of the south-western side of the lodge



Figure 4: Photo of the north-east elevation of the lodge



Figure 6: Photo of the existing car park and northeast side of the building



Figure 8: Photo of the Mountain Tea-tree clump recommended to be removed



Figure 9: Photo of the south-western side of the



Figure 11: Photo of the trees at the front eastern corner to be removed



Figure 10: Photo of the rear south-east side of the lodge



Figure 12: Photo of the Brindle Bull Close, a two way sealed road

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 with the subject site highlighted

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 44 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 44(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 Thredbo Alpine Resort, 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.

3. **METHODOLOGY**

3.1 Site Inspection

A site inspection was undertaken by Dabyne Planning Pty Ltd in July 2020, 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 formations within 140m of the development 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).

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.

Vegetation & Slope Classification 4.1

The vegetation formation to the west and south-west is considered to have the most influence in the event of a bushfire, as illustrated in figure 14 below. This is categorised as 'Forest' vegetation.

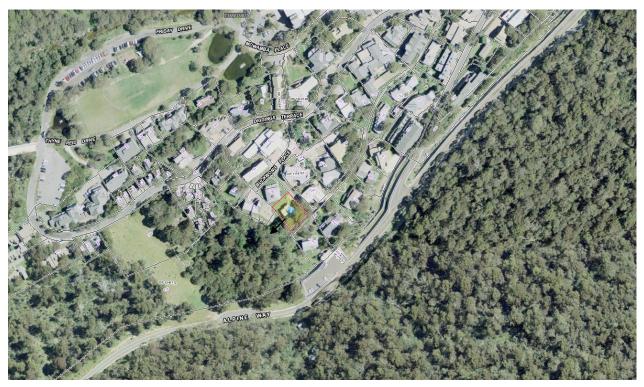


Figure 14: Aerial view demonstrating the location of the vegetation that would have the most influence in the event of a bushfire

In context with the mapped bushfire prone vegetation, the map below illustrated the location of the development site.



Figure 15: Location of the site in relation to the mapped bushfire prone vegetation

SIGNIFICANT ENVIRONMENTAL FEATURES 5.

The proposed additions and alterations will require the removal of native Eucalypts and this report also recommends the removal of a clump of Mountain Tea-trees to the south-west of the development, to provide a greater APZ.

This has been assessed by an Accredited Ecologist as being acceptable.

BUSHFIRE ASSESSMENT 6.

6.1 Special Fire Protection Purpose Developments

6.1.1 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 development will result in a significant improvement to the bushfire risk outcome for the development and site, by way of:

- Removal of seven [7] large trees directly adjacent to the existing building, some within 2m of the building.
- Recommended removal of a clump of Mountain Tea-trees to the south-west of the building to provide a larger APZ.
- Upgrade of a building with currently minimal construction standards under any BAL under AS 3959, including replacement of timber cladding.
- New development to comply with the recommended BAL-29 under AS 3959, including use of non-combustible cladding.

Standards for Bush Fire Protection Measures for Special Fire 6.2 **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.	 APZ are wholly within the boundaries of the development site; and 	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:					
managed to minimise flame	Iandscaping is in accordance with Appendix 4; and	√	Complies.		
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	✓	The proposed development works
withstand bush fire attack in	under AS 3959 or NASH Standard		are recommended to achieve
the form of wind, embers,	and section 7.5 of PBP is applied.		compliance with BAL-29, as
radiant heat and flame			discussed below.
contact.			

APZ:

The minimum APZ for Forest vegetation with an effective slope of Up slopes and flat is 67m to the predominant vegetation formation to the west/south-west.

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.

Neither the existing lodge nor the proposed additions are able to comply with A1.12.1 with a 67m APZ not able to be achieved.

In fact, most if not all buildings located outside of the village core of the Thredbo Alpine Resort would not be able to achieve compliance with Table A1.12.1.

Notwithstanding this, the proposed development can provide an improved defendable space as part of an improved and larger APZ by way of removing seven (7) large trees directly adjacent to the existing building, some within 2m of the building.

Furthermore, this report recommends the removal of a clump of Mountain Tea-trees to the south-west of the building to provide a larger APZ. These impacts have been assessed by an Accredited Ecologist and are considered acceptable as outlined in the SEE.

The provision of an APZ to the west/south-west of the site is consistent with the Thredbo Bush Fire Preparation Map, with an extract provided below.

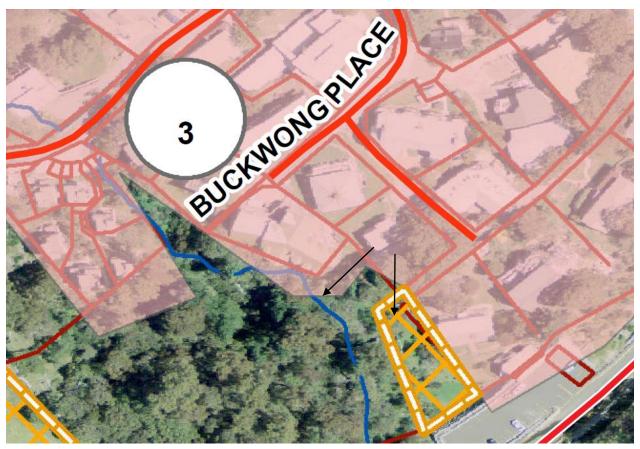


Figure 16: Thredbo Bush Fire Preparation Map in relation to the subject site

Furthermore, a Bushfire Attack Level (BAL) greater than the BAL12.5 required under Table 6.8a can be achieved in accordance with Table A1.12.7.

With the removal of vegetation, an APZ of 15m to the west/south-west can be achieved, thus requiring a BAL-29 construction standard.

With the current building having no compliance with any BAL under AS 3959, this represents a significant improvement to the bushfire risk outcome for the development.

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	Acceptable Solutions	Can	Comments				
The intent may be achieved where:		Comply?					
> firefighting vehicles are	> SFPP access roads are two-wheel	\checkmark	Access road is two-wheel drive				
provided with safe, all-	drive, all-weather roads;		and all-weather.				
weather access to structures	> access is provided to all structures;	N/A	Not relevant to the proposed				
and hazard vegetation.			works.				

	raffic 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.

Water Supply:							
Performance Criteria	Acceptable Solutions	Can	Comments				
The intent may be achieved where:		Comply?					
an adequate water supply for	reticulated water is to be provided	\checkmark	Reticulated water is available.				
firefighting purposes is	to the development, where						
installed and maintained.	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.	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.	 hydrants are not located within any road carriageway; and reticulated water supply to SFPPs 	N/A N/A	Not relevant to the proposed works Not relevant to the proposed
	uses a ring main system for areas with perimeter roads.	•	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.
	> unobstructed access is provided at all times;	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.

	underground tanks are clearly marked,	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:			
limits the possibility of ignition	> where practicable, electrical transmission lines are underground;	✓	Electricity supply is provided underground.
of surrounding bush land or the fabric of buildings.	 where overhead, electrical transmission lines are proposed as follow: lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas; and no part of a tree is closer to a 	N/A	Not applicable.
	power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines.		
Gas Services:			
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;	√	Can comply if relevant, to be conditioned.
	all fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side;	✓	Can comply if relevant, to be conditioned.
	> connections to and from gas cylinders are metal;	✓	Can comply if relevant, to be conditioned.

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;	√	Can comply if relevant, to be conditioned.
polymer-sheathed flexible gas supply lines to gas meters adjacent to buildings are not to be used; and	√	Can comply if relevant, to be conditioned.
above-ground gas service pipes external to the building are metal, including and up to any outlets.	✓	Can comply if relevant, to be conditioned.

6.2.4 Emergency Management Planning

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

Performance Criteria The intent may be achieved where:	Acceptable Solutions	Can Comply?	Comments
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. 		Thredbo Alpine Resort has a village wide Bush Fire Emergency Management and Evacuation Plan.
appropriate and adequate management arrangements are established for consultation and implementation of the Bush Fire Emergency Management	➤ 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	N/A	Not relevant to the proposed works

and Evacuation Plan.	> detailed plans of all emergency	N/A	Not relevant to the proposed
	assembly areas including on site and		works
	off-site arrangements as stated in		
	AS 3745:2010 are clearly displayed,		
	and an annually emergency		
	evacuation is conducted.		

7. CONCLUSION

The proposed development will result in a substantial upgrade to the existing lodge, converting it to three (3) self-contained apartments with the same bed capacity and therefore no increase in overall accommodation capacity.

This provides an opportunity to upgrade the building with regard to bushfire risk, with the current building achieving minimal compliance for any BAL construction standard, particularly with timber cladding.

The proposed development will result in a significant improvement to the bushfire risk outcome for the development and site, by way of:

- Removal of seven [7] large trees directly adjacent to the existing building, some within 2m of the building.
- Recommended removal of a clump of Mountain Tea-trees to the south-west of the building to provide a larger APZ.
- Upgrade of a building with currently minimal construction standards under any BAL under AS 3959, including replacement of timber cladding.
- New development to comply with the recommended BAL-29 under AS 3959, including use of non-combustible cladding.

This will allow for the development to achieve the following objectives as set out for the Alpine Resorts.

- Provide an improved defendable space.
- Provide a better bush fire protection outcome.
- Ensure new building work complies with the construction standards set out in AS
- Ensure building design and construction standards enhance the chances of occupant and building survival.

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