

# Bushfire Assessment Report



# BUSHFIRE ASSESSMENT REPORT

## INDUSTRIAL DEVELOPMENT

### 6 Dudgeons Lane, Bangalow

Prepared for Lighthouse Laundry Services Ltd



## Bushfire Planning Australia

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BPA Reference: 2393 Bangalow

Prepared for Lighthouse Laundry

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## Disclaimer and Limitation

This report is prepared solely for Lighthouse Laundry Services Ltd (the 'Client') for the specific purposes of only for which it is supplied (the 'Purpose'). This report is not for the benefit of any other person; either directly or indirectly and is strictly limited to the purpose and the facts and matters stated in it and will not be used for any other application.

This report is based on the site conditions surveyed at the time the document was prepared. The assessment of the bushfire threat made in this report is made in good faith based on the information available to Bushfire Planning Australia at the time.

The recommendations contained in this report are considered to be minimum standards and they do not guarantee that a building or assets will not be damaged in a bushfire. In the making of these comments and recommendations it should be understood that the focus of this document is to minimise the threat and impact of a bushfire.

Finally, the implementation of the adopted measures and recommendations within this report will contribute to the amelioration of the potential impact of any bushfire upon the development, but they do not and cannot guarantee that the area will not be affected by bushfire at some time.

## Document Status: 2393 - Industrial Development

Version	Status	Purpose	Author	Review Date
1	Draft	Draft for Review	Katrina Mukevski	11 September 2023
2	Draft	Draft for Client Review	Stuart Greville	15 September 2023
3	Final	Final for Submission	Stuart Greville	15 September 2023

## Certification

As the author of this Bushfire Assessment Report (BAR), I certify this BAR provides the detailed information required by the NSW Rural Fire Service under Clause 45 of the Rural Fires Regulation 2022 and Appendix 2 of Planning for Bushfire Protection 2019 in accordance with the requirements of section 4.14 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).



**Stuart Greville**

Accredited Bushfire Practitioner

BPAD-26202



Date: 15 September 2023

In signing the above, I declare the report is true and accurate to the best of my knowledge at the time of issue.

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## Executive Summary

Bushfire Planning Australia (BPA) has been engaged by Lighthouse Laundry Services Ltd (the 'Client') to undertake a Bushfire Assessment Report (BAR) for a proposed commercial laundry facility located 6 Dudgeons Lane, Bangalow, legally known as Lot SP84845.

The proposed scope of works includes a change of use of the existing building from the current macadamia processing facility to a commercial laundry, minor internal works with several new windows and roller doors.

The National Construction Code (NCC) does not provide for any bush fire specific performance requirements for the proposed development; being a development that will facilitate the construction of non-habitable buildings. The general fire safety construction provisions of the NCC are taken as acceptable solutions in this instance.

PBP 2019 refers to the proposed industrial development as 'Other development'. Given the unique features of these developments, compliance with PBP is strongly focused in satisfying the aims and objectives of PBP 2019.

A hazard assessment has been completed and found the study area was exposed to a low bushfire hazard located to the east of the subject site. The predominant vegetation surrounding the site is consistent with a *rainforest*, namely *Sub-tropical Rainforest* vegetation formation as described in the NSW Rural Fire Service document Planning for Bushfire Protection 2019 (PBP 2019). The northern boundary is defined by an unformed Crown road reserve which continues into an open managed paddock. The nearest vegetation was assessed as a low risk due to the landscape and evidence of regular maintenance.

The following recommendations when implemented will reduce the impact of a bushfire to an acceptable level for the proposed industrial (non-habitable) buildings and demonstrate the proposed development is able to comply with PBP 2019:

1. The entire site shall be managed as an Inner Protection Area (IPA) as outlined within Appendix 4 of PBP 2019 and the RFS document *Standards for asset protection zones*;
2. The building shall be connected to a reliable water supply network and that suitable fire hydrants are located throughout the development site that are clearly marked and provided for the purposes of bushfire protection. Fire hydrant spacing, sizing and pressure shall comply with AS2419.1 2005 and Table 5.3c of PBP 2019;
3. Consideration should be given to landscaping and fuel loads on site to decrease potential fire hazards on site; and
4. All hazardous materials to be stored on land within 100m of any designated bushfire prone land shall be stored in a secure enclosure away from the bushfire hazard.

This assessment has been made based on the bushfire hazards observed in and around the site at the time of inspection and production (September 2023).

Should the above recommendations be implemented, the existing bushfire risk should be suitably mitigated to offer an acceptable level of protection to life and property for those persons and assets occupying the site, but they do not and cannot guarantee that the area will not be affected by bushfire at some time.

## Table of Contents

<b>Executive Summary</b> .....	<b>2</b>
<b>Terms and Abbreviations</b> .....	<b>5</b>
<b>1. Introduction</b> .....	<b>6</b>
<b>2. Site Description</b> .....	<b>7</b>
2.1. Bushfire Prone Land .....	9
2.2. Proposed Development .....	11
2.3. Industrial Development .....	12
<b>3. Bushfire Hazard Assessment</b> .....	<b>13</b>
3.1. Vegetation Assessment .....	13
3.1.1. Reliability Assessment .....	13
3.2. Slope Assessment .....	15
3.4. Significant Environmental Features .....	18
3.5. Threatened Species, populations or ecological communities .....	18
3.6. Aboriginal Objects .....	18
3.7. Results .....	18
<b>4. Bush Fire Protection Measures</b> .....	<b>21</b>
4.1. Asset Protection Zones .....	21
4.1.1. Determining the Appropriate Setbacks .....	21
4.2. Access .....	23
4.3. Services - water, electricity and gas .....	23
4.3.1. Water .....	23
4.3.2. Electricity .....	23
4.3.3. Gas .....	23
4.4. Construction Standards - Bushfire Attack Level .....	24
4.5. Landscaping and Vegetation Management .....	25
4.6. Emergency Services .....	26
<b>5. Conclusion and Recommendations</b> .....	<b>27</b>
<b>6. References</b> .....	<b>28</b>



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## Figures

Figure 1: Land Zone Use (Byron LEP 2014).....	7
Figure 2: Site Locality Plan.....	8
Figure 3: Bushfire Prone Land Map (NSW Rural Fire Service 2023).....	10
Figure 4: Plan of Proposed Development .....	11
Figure 5: NSW State Vegetation Type (DPE 2022) .....	14
Figure 6: Digital Elevation Model.....	16
Figure 7: Slope Analysis - LiDAR.....	17
Figure 8: Slope and Vegetation Assessment.....	20
Figure 9: NSW Fire and Rescue - Bangalow .....	26

## Tables

Table 1: Site Details .....	7
Table 2: Slope and Vegetation Assessment results.....	19
Table 3: Recommended Asset Protection Zones .....	22
Table 4: Required BALs .....	24

## Appendices

Appendix A: Proposed Development Layout

Appendix B: AHIMS Search Results

## Terms and Abbreviations

Abbreviation	Meaning
APZ	Asset Protection Zone
AS2419 -2005	Australian Standard – Fire Hydrant Installations
AS3959-2018	Australian Standard – Construction of Buildings in Bush Fire Prone Areas
BAR	Bushfire Assessment Report
BAL	Bushfire attack level
BCA	Building Code of Australia
BC Act	NSW Biodiversity Act 2016
BFPL	Bush Fire Prone Land
BFPLM	Bush Fire Prone Land Map
BMP	Bush Fire Management Plan
BPA	Bush Fire Prone Area (Also Bushfire Prone Land)
BPM	Bush Fire Protection Measures
BSC	Byron Shire Council
DoE	Commonwealth Department of the Environment
DPI Water	NSW Department of Primary Industries – Water
EP&A Act	NSW Environmental Planning and Assessment Act 1979
EPBC Act	Commonwealth Environment Protection and Biodiversity Conservation Act 1999
FDI	Fire Danger Index
FMP	Fuel Management Plan
ha	hectare
IPA	Inner Protection Area
LGA	Local Government Area
NCC	National Construction Code
OPA	Outer Protection Area
OEH	NSW Office of Environment and Heritage
PBP or PBP (2019)	Planning for Bushfire Protection 2019
RF Act	Rural Fires Act 1997
RF Regulation	Rural Fires Regulation
RFS	NSW Rural Fire Service
SFR	Short fire run
TSC Act	NSW Threatened Species Conservation Act 1995 (as repealed)
URA	Urban release area

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## 1. Introduction

Bushfire Planning Australia (BPA) has been engaged by Lighthouse Laundry Services Ltd (the 'Client') to undertake a Bushfire Assessment Report (BAR) for the proposed commercial laundry facility located at 6 Dudgeons Lane, Bangalow, legally known as Lot SP84845.

Section 8.3 of PBP 2019 refers to any type of development that are not residential/ rural residential subdivisions, SFPPs or residential infill development as 'Other development'. The proposed development seeks consent for a change of use from the current macadamia factory to a commercial laundry, predominantly consisting of internal works with some proposed windows and roller doors.

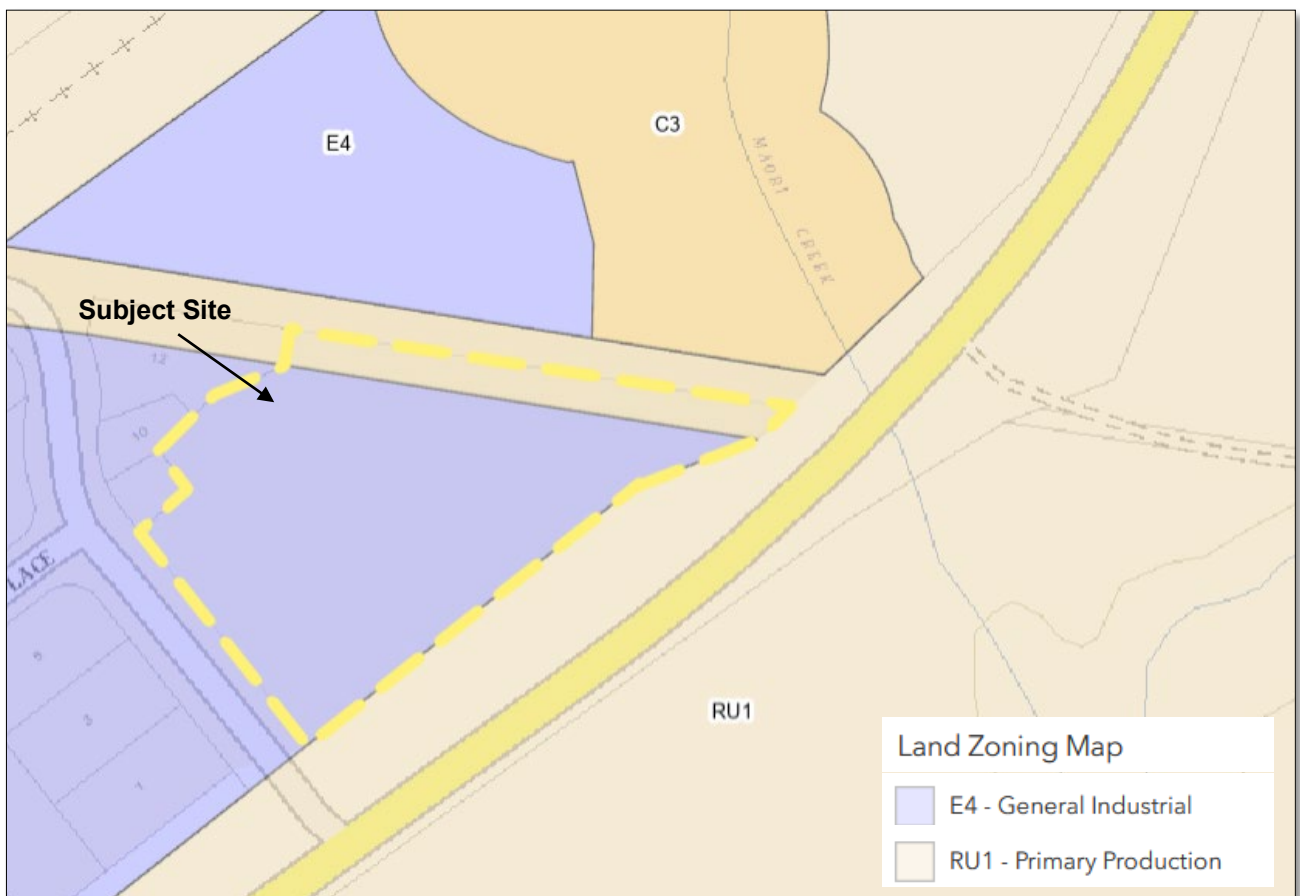
The National Construction Code (NCC) does not provide for any bush fire specific performance requirements for other development, such as the proposed industrial development. The general fire safety construction provisions of the NCC are taken as acceptable solutions in this instance.

Nevertheless, in order to demonstrate the proposed industrial development is able to satisfy the aims and objectives of PBP 2019, this BAR was completed to determine the bushfire hazard that has the potential to threaten the proposed development. Based on this assessment, a series of bushfire protection measures that will provide for an increased level of protection on property and life from the threat of bushfire have been recommended; thereby satisfying the aims and objectives of Planning for Bushfire Protection 2019 (PBP 2019).

## 2. Site Description

**Table 1: Site Details**

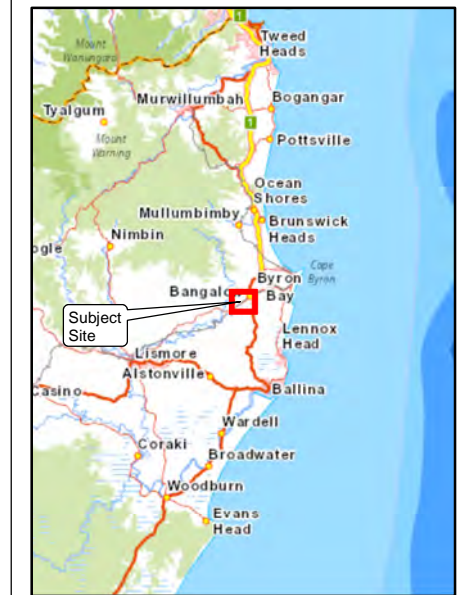
<b>Address</b>	6 Dudgeons Lane, Bangalow
<b>Title</b>	Lot SP84845
<b>LGA</b>	Byron Shire Council
<b>Site Area</b>	9,683m <sup>2</sup>
<b>Land Use Zone</b>	E4 General Industrial and RU1 Primary Production
<b>Context</b>	<p>The site is located on the northern corner of the intersection of Dudgeons Lane and Lismore Road and is currently operating as a macadamia processing facility. The site currently contains multiple large sheds and a large, cleared area providing road access and parking.</p> <p>There is a large tree in the western corner and managed grass in the eastern corner of the site. Vegetation exists to the north and east of the site, whilst existing industrial properties exist to the south and west.</p>
<b>Topography</b>	The site is generally flat with a slope increasing along the southern boundary and the eastern corner of the site.
<b>Fire Danger Index</b>	The site lies within a local government area with a Fire Danger Index (FDI) rating of 80.



**Figure 1: Land Zone Use (Byron LEP 2014)**

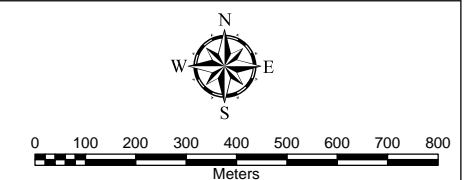
Figure 2

# Site Location



- Subject Site
- 100m Buffer
- 140m Buffer

SOURCE:  
Cadastral Boundary: NSW Department of Finance,  
Services and Innovation 2023  
Basemap: © Department of Customer Service  
2020

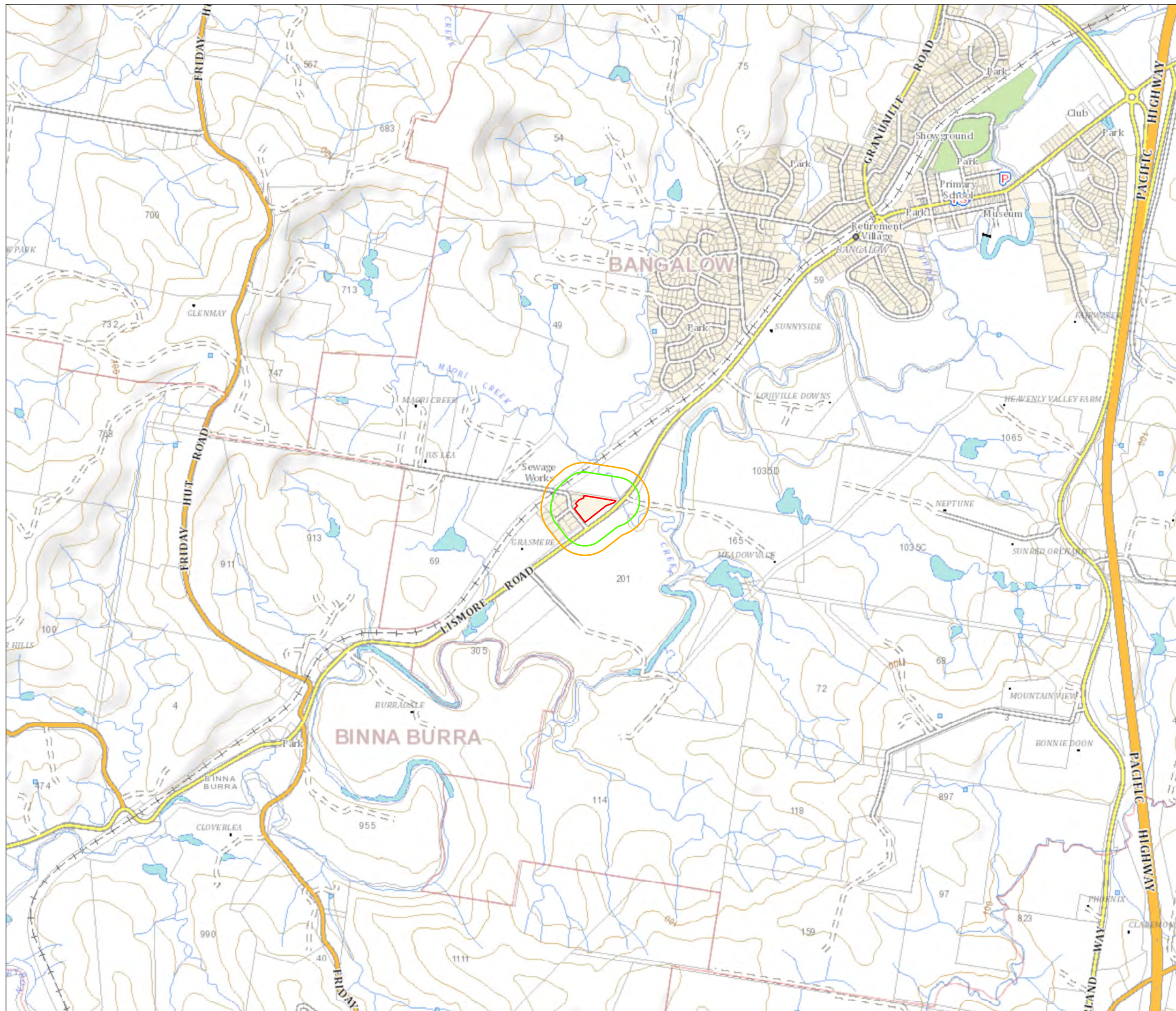


A3 Scale: 1:15,000

File:2393-Bangalow-Fig1-SiteLocation-230911 Date: 11/09/2023

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## 2.1. Bushfire Prone Land

Bushfire activity is prevalent in landscapes that carry fuel and the two predominant bushfire types are grassland and forest fires. Factors such as topographic characteristics and quantity of fuel loads influence the intensity and spread of fire. The scale of a bushfire hazard is tailored to the characteristics of the hazard, the size and characteristics of the affected population, types of land use exposed to bushfire, predicted development growth pressures and other factors affecting bushfire risk.

**Figure 3** demonstrates the site is mapped as Vegetation Buffer bushfire prone land along the north-western, northern, and eastern boundaries. The remainder of the site is not mapped as bushfire prone land.








There is a narrow corridor of Vegetation Buffer immediately surrounding the entire site which transitions to Vegetation Category 3 within and beyond 140m in all directions of the site except to the south-west. To the south-west of the site, separated by Dudgeons Lane, are existing industrial properties that are not identified as bushfire prone land.

Additionally, there is isolated portions of Vegetation Category 2 bushfire prone land to the north-west and east within 140m of the site, the latter being the primary bushfire hazard.

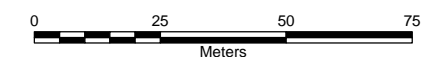
Figure 3

# NSW Bush Fire Prone Land



-  Subject Site
-  100m Buffer
-  140m Buffer
- Bushfire Prone Land**
  -  Vegetation Category 1
  -  Vegetation Category 2
  -  Vegetation Category 3
  -  Buffer

SOURCE:  
Cadastral Boundary: NSW Department of Finance,  
Services and Innovation 2023  
NSW Bush Fire Prone Land: NSW Rural Fire Service  
2023  
Aerial photo: NearMap 20/08/23



A3 Scale: 1:1,500

File:2393-Bangalow-Fig2-BFPL-230911 Date: 11/09/2023

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## 2.3. Industrial Development

Section 8.3 of PBP 2019 provides specific advice for developments that are not residential subdivision, special fire protection purposes (SFPPs) or residential infill. The proposed development is limited to Class 5-8 and 10 buildings of the National Construction Code: Building Code of Australia (NCC). These classes of buildings include factories, warehouses, offices and other industrial facilities. Residential development and habitable buildings are not permissible on the subject site.

The general aims and objectives of PBP 2019 apply in relation to matters such as access, water and services, emergency planning and landscaping/ vegetation management. However, it is prudent that a suitable package of bushfire protection measures be proposed commensurate with the assessed level of risk of the future development. Accordingly, this BAR will recommend areas cleared of vegetation are maintained at the hazard interface to ensure defensible space is provided for firefighting purposes.

Notwithstanding the available bushfire protection measures outlined in PBP 2019, the NCC does not provide for any bushfire specific performance requirements for industrial (non-habitable buildings) and as such Australian Standard *AS3959-2018 Construction of buildings in bushfire prone areas* (AS3959-2018) does not apply as a set of deemed-to-satisfy provisions. However, the following objectives apply in relation to access, water and services, and emergency and evacuation planning:

- ❑ To provide safe access to/from the public road system for firefighters providing property protection during a bush fire and for occupant egress for evacuation;
- ❑ To provide suitable emergency and evacuation (and relocation) arrangements for occupants of the development;
- ❑ To provide adequate services of water for the protection of buildings during and after the passage of bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building; and
- ❑ Consideration of storage and hazardous materials away from the hazard wherever possible.

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## 3. Bushfire Hazard Assessment

### 3.1. Vegetation Assessment

Vegetation classification over the site and surrounding area has been carried out as follows:

- ❑ Historical series of aerial photograph interpretation to map the vegetation classification and extent (Nearmap 2012-2023);
- ❑ Reference to NSW State Vegetation Type NSW Department of Planning, Industry and Environment 2022 (**Figure 5**); and
- ❑ Review of Byron Shire Council Web Map – Vegetation Communities.

In accordance with PBP 2019, an assessment of the vegetation over a distance of 140m in all directions from the site was undertaken. Vegetation that may be considered a bushfire hazard was identified in all directions from the development footprint. The vegetation classification is based on Appendix 1 of PBP 2019. The inconsistencies between the mapping sources listed above was quantified during the site inspection and compared to the Keith Vegetation Formations.

#### 3.1.1. Reliability Assessment







Although the bushfire prone land mapping is intended to be regularly updated, land use and vegetation cover that contribute to bushfire hazards are subject to change. A reliability assessment was undertaken for the subject site and all land within 140m. In this instance the bushfire prone land mapping is mostly consistent with existing vegetation, namely the vegetation within 140m surrounding the site.

A site inspection has not been completed as the site and proposed use does not present a high risk, and the desktop assessment found evidence the surrounding landscape was also of lower risk.

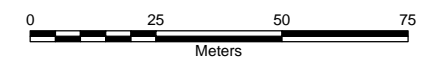
Figure 5

# NSW State Vegetation Type (Class)



-  Subject Site
-  100m Buffer
-  140m Buffer
- Vegetation Class**
-  Coastal Swamp Forests
-  Subtropical Rainforests
-  Not native vegetation

SOURCE:  
Cadastral Boundary: NSW Department of Finance,  
Services and Innovation 2023  
NSW Vegetation Type: NSW Department of  
Planning, Industry and Environment 2022  
Aerial photo: NearMap 20/08/23



A3 Scale: 1:1,500

File: 2393-Bangalow-Fig3-Vegetation-NSW-SVT-230911 Date: 11/09/2023

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## 3.2. Slope Assessment

The slope assessment was undertaken as follows:

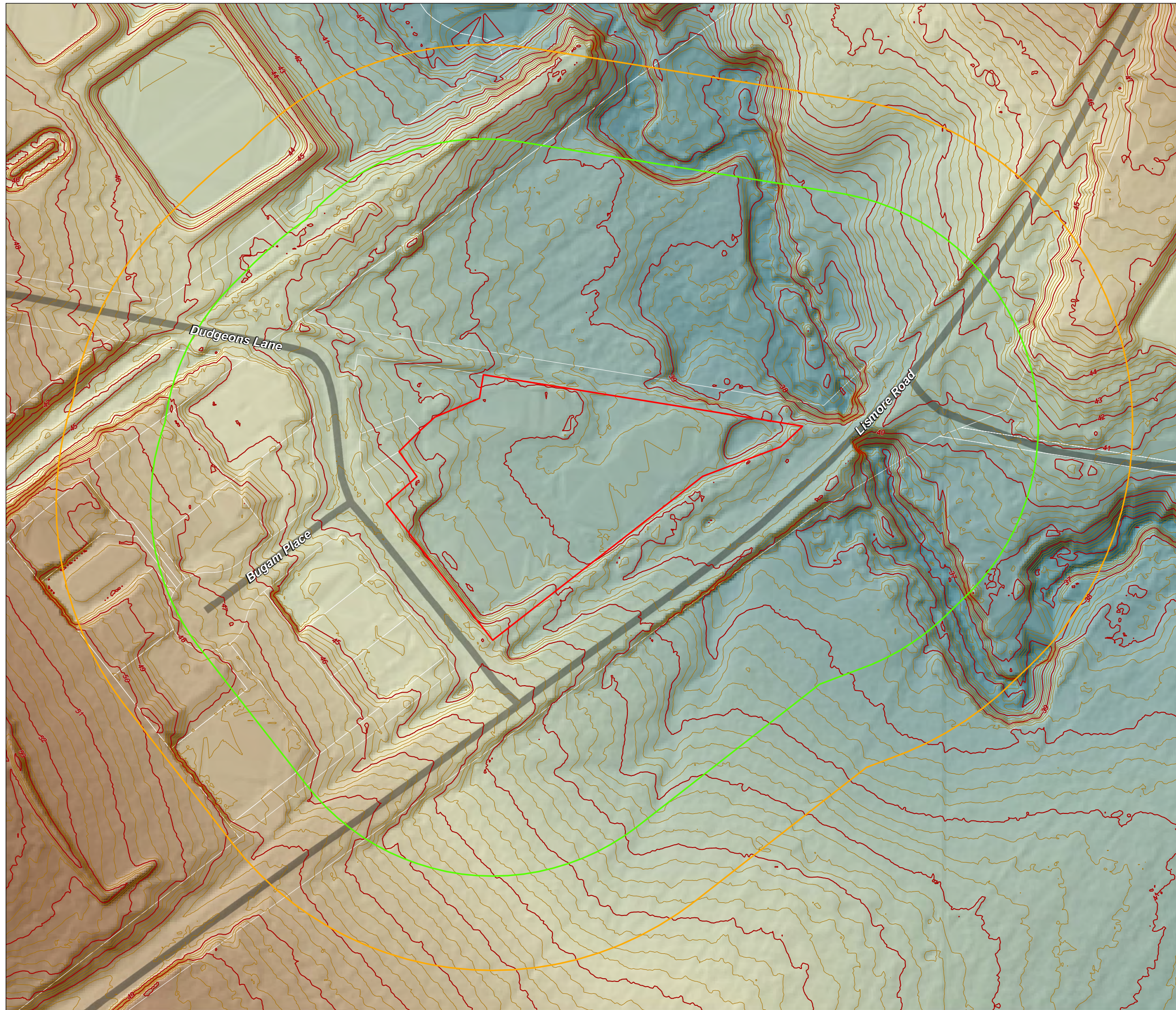
- ❑ Review of LiDAR point cloud data – including DEM (NSW LPI); and
- ❑ Detail survey of existing contours.







An assessment of the slope over a distance of 100m in the hazard direction from the site boundary was undertaken. The effective slope was then calculated under the classified vegetation where there was a fire run greater than 50m. The topography of the site has been evaluated to identify both the average slope and by identifying the maximum slope present. These values help determine the level of gradient which will most significantly influence the fire behaviour of the site.

The effective slope in all directions is shown in **Figure 6** and **Figure 7** and **Table 2**.

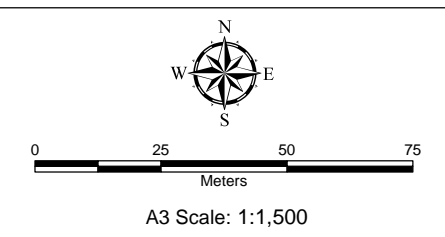
The final bushfire hazard assessment defining vegetation classifications and effective slope is shown in **Figure 8**.

Figure 6  
**Digital  
Elevation  
Model**



-  Subject Site
-  100m Buffer
-  140m Buffer
-  Contour (1m)
-  Contour (0.25m)
- Elevation (AHD)**
-  High : 54m  
Low : 36m

SOURCE:  
Cadastral Boundary: NSW Department of Finance,  
Services and Innovation 2023  
Surface analysis: Derived from Ballina 1m  
resolution LiDAR: © Department Finance, Services  
and Innovation 2010



File:2393-Bangalow-Fig4-DEM-230911 Date: 11/09/2023









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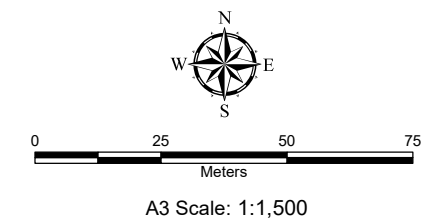
Figure 7

# Slope Analysis: LiDAR



-  Subject Site
-  100m Buffer
-  140m Buffer
- Slope**
-  0° - 5°
-  5° - 10°
-  10° - 15°
-  15° - 20°
-  >20°

SOURCE:  
Cadastral Boundary: NSW Department of Finance,  
Services and Innovation 2023  
Aerial Photo: Nearmap 20/08/2023  
Surface analysis: Derived from Ballina 1m  
resolution LiDAR: © Department Finance, Services  
and Innovation 2010



File:2393-Bangalow-Fig5-SlopeLiDAR-230911 Date: 11/09/2023

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### 3.4. Significant Environmental Features

There are no known environmental features of significance within the development footprint or the balance of the site. The development footprint is wholly located within that part of the site that is predominantly cleared.

### 3.5. Threatened Species, populations or ecological communities

The area of the site to be affected by the proposed development has been identified to minimise impact on any threatened species, population or EEC. All bushfire mitigation measures; including APZs have considered the existing and potential biodiversity values to minimise impact where possible.

### 3.6. Aboriginal Objects

A search of the AHIMS database (results contained in **Appendix B**) revealed there are no Aboriginal sites or places recorded in or near the subject site.

### 3.7. Results

All vegetation identified within the current Bush Fire Prone Land map was assessed to determine the severity of the potential bushfire hazard.

There is evidence the existing vegetation within the property to north of the site is frequently managed by the landowner. The subject site is separated from this property by an unformed public road which is partially (and informally) used as a car park by the existing tenants. The portion of the road reserve directly adjoining the subject buildings is formed as car park and also provides access around the subject site. The BAR has classed the land as a low threat hazard and excluded for the purposes of PBP 2019. The balance of the road reserve is being maintained by the adjoining landowner as part of the overall property maintenance schedule (eg, mowing/ slashing the grass). It is acknowledged that the continued maintenance of the potential *grassland* cannot be guaranteed, however the overall risk of the vegetation is considered a low threat as the grassland is managed in minimal fuel conditions.

Vegetation identified as a *rainforest*, specifically a *Sub-tropical Rainforest* exists to the north-west, east and south-west within 140m of the site, all isolated in nature. The *Sub-tropical Rainforest* that exists to the north-west and south-west transitions from managed and / or cleared lands. The *Sub-tropical Rainforest* that exists to the east is separated by Lismore Road and is identified as the primary bushfire hazard.

The remainder of the land to the south, south-west and west of the site is either managed or consists of existing industrial properties, both of which are not considered for the purposes of PBP 2019.

Overall, the findings of the bushfire assessment concluded that the subject site is exposed to a low bushfire hazard. The results of the Bushfire Hazard Assessment are presented in **Table 2** and **Figure 8**.

**Table 2: Slope and Vegetation Assessment results**

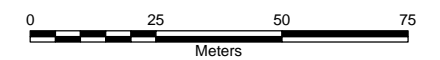
Transect	Vegetation or Other Infrastructure	Vegetation Classification (PBP 2019)	Slope
T1 North	Regularly managed land located to the north of the site and separated by a partially unformed public road	Excluded (Low-threat vegetation)	-0.3° Upslope
T2 North	Regularly managed land located to the north of the site and separated by a partially unformed public road	Excluded (Low-threat vegetation)	0.5° Downslope
T3 North	Unformed public road to the edge of an isolated Camphor Laurel (exotic vegetation)	Excluded (Low-threat vegetation)	5.2° Downslope
T4 North	Isolated Camphor Laurel (exotic vegetation) that is considered low-threat vegetation	Excluded (Low-threat vegetation)	1.0° Downslope
T5 On-site	Managed land from the eastern corner of the existing building to the north-eastern boundary	Excluded (Low-threat vegetation)	1.5° Downslope
T6 East	Eastern corner of the existing building to the edge of the primary bushfire hazard, separated by Lismore Road	Excluded (Low-threat vegetation)	1.4° Downslope

Figure 8  
**Slope &  
Vegetation  
Assessment**



- |                    |  |
|--------------------|--|
| Subject Site       | New Concrete Slab                          |
| Contour (1m)       | Warehouse Conversion                       |
| Contour (0.25m)    | <b>Vegetation Class</b>                    |
| 100m Buffer        | Coastal Swamp Forests                      |
| 140m Buffer        | Subtropical Rainforest >50% exotic species |
| RL                 | Low threat vegetation                      |
| Downslope transect | Not native vegetation                      |
| Upslope transect   |  |
| Approved Parking   |  |

SOURCE:  
Cadastral Boundary: NSW Department of Finance, Services and Innovation 2023  
Vegetation: BPA 2023  
Aerial photo: NearMap 20/08/23  
Surface analysis: Derived from Ballina 1m resolution LiDAR: © Department Finance, Services and Innovation 2010



A3 Scale: 1:1,500

File:2393-Bangalow-Fig6-SlopeVeg-230914

Date: 14/09/2023

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## 4. Bush Fire Protection Measures

Planning for Bushfire Protection (PBP 2019) refers to the proposed industrial development as 'Other development'. In order to comply with PBP, the development should:

- Note the range of available Bush Fire Protection Measures (BFPMs);
- Satisfy the aims and objectives of PBP 2019;
- Consider any matters listed for the specific purpose; and
- Propose an appropriate combination of BFPMs.

Additional provisions relevant to 'other development' detailed in PBP 2019 state that in order to comply with PBP 2019, the following conditions must be met:

- Satisfy the aims and objectives of PBP outlined in Chapter 1;
- Consider any issues listed for the specific purpose for the development; and
- Propose an appropriate combination of BFPMs.

This BAR has adopted the methodology to determine the appropriate BFPMs detailed in PBP 2019. As part of the BAR, the recommended BFPMs demonstrate the aims and objectives of PBP 2019 are able to be satisfied; including the matters considered by the RFS necessary to protect persons, property and the environment from the danger that may arise from a bushfire.

### 4.1. Asset Protection Zones

An APZ is an area surrounding a development that is managed to reduce the bushfire hazard to an acceptable level to mitigate the risk to life and property. The required width of the APZ varies with slope and the type of hazard.

#### 4.1.1. Determining the Appropriate Setbacks

PBP 2019 does not explicitly require the proposed industrial development to provide an APZ in accordance with Appendix 1 of PBP 2019. Notwithstanding, the provision of access and defensible space is provided by the service roads. As the site lies within the Byron Shire LGA, it is assessed under a FDI rating of 80, consideration has been given to the type of hazard including the average slope and also the steepest slope.

Refer to **Table 3** confirming there are no APZ requirements given the existing and surrounding lands are considered low threat vegetation.

**Table 3: Recommended Asset Protection Zones**

<b>Transect</b>	<b>Vegetation Classification (PBP 2019)</b>	<b>Slope</b>	<b>APZ Table A1.12.3</b>
T1 North	Excluded (Low-threat vegetation)	-0.3° Upslope	N/A
T2 North	Excluded (Low-threat vegetation)	0.5° Downslope	N/A
T3 North	Excluded (Low-threat vegetation)	5.2° Downslope	N/A
T4 North	Excluded (Low-threat vegetation)	1.0° Downslope	N/A
T5 On-site	Excluded (Low-threat vegetation)	1.5° Downslope	N/A
T6 East	Excluded (Low-threat vegetation)	1.4° Downslope	N/A

## 4.2. Access

In the unlikely event of a serious bushfire, it will be essential to ensure that adequate ingress / egress and the provision of defensible space are afforded in the development layout. The following design specifications detailed in PBP 2019 are relevant to the proposed development:

- ❑ be two-wheel drive all weather roads;
- ❑ be through roads, but if unavoidable then dead ends should be not more than 200 metres in length, incorporate a minimum 12 metres turning circle (either in cul-de-sac or T-head formation) and should be clearly sign posted as dead ends;
- ❑ the capacity of road surfaces is sufficient to carry fully loaded fire fighting vehicles (approximately 15 tonnes for areas with reticulated water, 28 tonnes for all other areas);
- ❑ non perimeter roads comply with table – Road widths for Category 1 Tanker;
- ❑ curves of roads (other than perimeter roads) are a minimum inner radius of 6 metres and minimal in number, to allow for rapid access and egress;
- ❑ maximum grade for sealed roads do not exceed 12.5°;
- ❑ have a minimum vertical clearance to a height of four metres at all times;
- ❑ parking bays are a minimum of 2.6 metres wide from kerb edge to road pavement. No services or hydrants are located within the parking bays.

Primary access will continue to be provided by Dudgeons Lane. In an emergency, access to the site could also be provided from Lismore Road (east) and the unformed public road (north). These access points will remain as part of the proposed development and will enable firefighters to access the site whilst occupants are evacuating the site or any of the buildings.

The existing access arrangements satisfy the requirements PBP 2019. Refer to **Appendix 1** for proposed development showing access.

## 4.3. Services - water, electricity and gas

### 4.3.1. Water

Fire hydrant spacing, sizing and pressure should comply with AS 2419.1:2005. Hydrants are not to be located within any road carriageway.

All buildings within the proposed development will be connected to a reticulated water supply and an existing fire hydrant is located within 70m of the building.

### 4.3.2. Electricity

All electricity services will continue to be supplied by overhead transmission lines.

### 4.3.3. Gas

It is proposed LPG gas tanks will be installed at the mid-section of the site's eastern boundary. The new gas cylinders will be installed and maintained according to the requirements of the relevant authorities and AS 1596:2014. It is expected that the location of gas services will not lead to ignition of surrounding bushland or the fabric of buildings.

#### 4.4. Construction Standards - Bushfire Attack Level

The proposed land use zone permits a variety of non-habitable buildings included bulky goods premises, general industries, warehouses and distribution centres. The NCC does not provide for any bushfire specific performance requirements for these particular classes of buildings. As such, AS3959-2018 are not considered as a set of deemed-to-satisfy provisions. However, compliance with AS3959-2018 and the NASH standard may be considered when meeting the aims and objectives of PBP 2019 – for future industrial buildings.

The determinations of the appropriate bushfire attack level (BAL) is based on the maximum potential radiant heat exposure. BALs are based upon parameters such as weather modelling, fire-line intensity, flame length calculations, as well as vegetation and fuel load analysis. The determination of the BAL is derived by assessing the:

- Relevant FDI = 80;
- Flame temperature = 1090K;
- Slope = *mostly flat*;
- Vegetation classification = *Rainforest*; and
- Building location.

The BALs for each transect have been calculated and provided in **Table 4**.

There are no major alteration and additions to the existing buildings. Minor maintenance work to existing doorways and window openings will be undertaken, however the fabric of the existing buildings will remain unaltered.

**Table 4: Required BALs**

Transect/ Aspect	Vegetation Classification (PBP 2019)	Slope	APZ (Table A1.12.3)	Distance from Hazard	Bushfire Attack Level (BAL)
North, South & West	Excluded (Low Threat vegetation / managed land)	Various	<b>N/A</b>	N/A	BAL-LOW

## 4.5. Landscaping and Vegetation Management

The design and management of the landscaped areas in the vicinity of buildings have the potential to improve the chances of survival of people and buildings. Generally landscaping in and around a bushfire hazard should consider the following:

- Priority given to retaining species that have a low flammability;
- Priority given to retaining species which do not drop much litter in the bushfire season and which do not drop litter that persists as ground fuel in the bush fire season;
- Priority given to retaining smooth barked species over stringy bark; and
- Create discontinuous or gaps in the vegetation to slow down or break the progress of fire towards the dwellings.

Landscaping should give due regard to fire retardant plants and ensure that fuel loads do not accumulate as a result of the selected plant varieties.

The principles of landscaping for bushfire protection aim to:

- Prevent flame impingement on buildings;
- Provide a defensible space for property protection;
- Reduce fire spread;
- Deflect and filter embers;
- Provide shelter from radiant heat; and
- Reduce wind speed.

Plants that are less flammable have the following features;

- High moisture content;
- High levels of salt;
- Low volatile oil content of leaves;
- Smooth barks without 'ribbons' hanging from branches or trunks; and
- Dense crown and elevated branches.

Avoiding understorey planting and regular trimming of the lower limbs of trees also assists in reducing fire penetration into the canopy. Rainforests species such as Syzygium and figs are preferred to species with high fine fuel and/or oil content.

Trees with loose, fibrous or stringy bark should be avoided. These trees can easily ignite and encourage ground fire to spread up to, and then through the crown of trees.

Careful thought must be given to the type and physical location of any proposed site landscaping. Inappropriately selected and positioned vegetation has the potential to 'replace' any previously removed fuel load.

Bearing in mind the desired aesthetic and environment sought by site landscaping, some basic principles have been recommended to help minimise the chance of such works contributing to the potential hazard on site.

Whilst it is recognised that fire-retardant plant species are not always the most aesthetically pleasing choice for site landscaping, the need for adequate protection of life and property requires that a suitable balance between visual and safety concerns be considered.

It is reiterated again that it is essential that any landscaped areas and surrounds are subject to ongoing fuel management and reduction to ensure that fine fuels do not build up.

## 4.6. Emergency Services

There is a NSW Fire & Rescue Station located at 56 Byron Bay Road, Bangalow, approximately 2.2kms or 3 minutes drive away from the site (**Figure 9**). This station would likely be the first responder in an emergency.

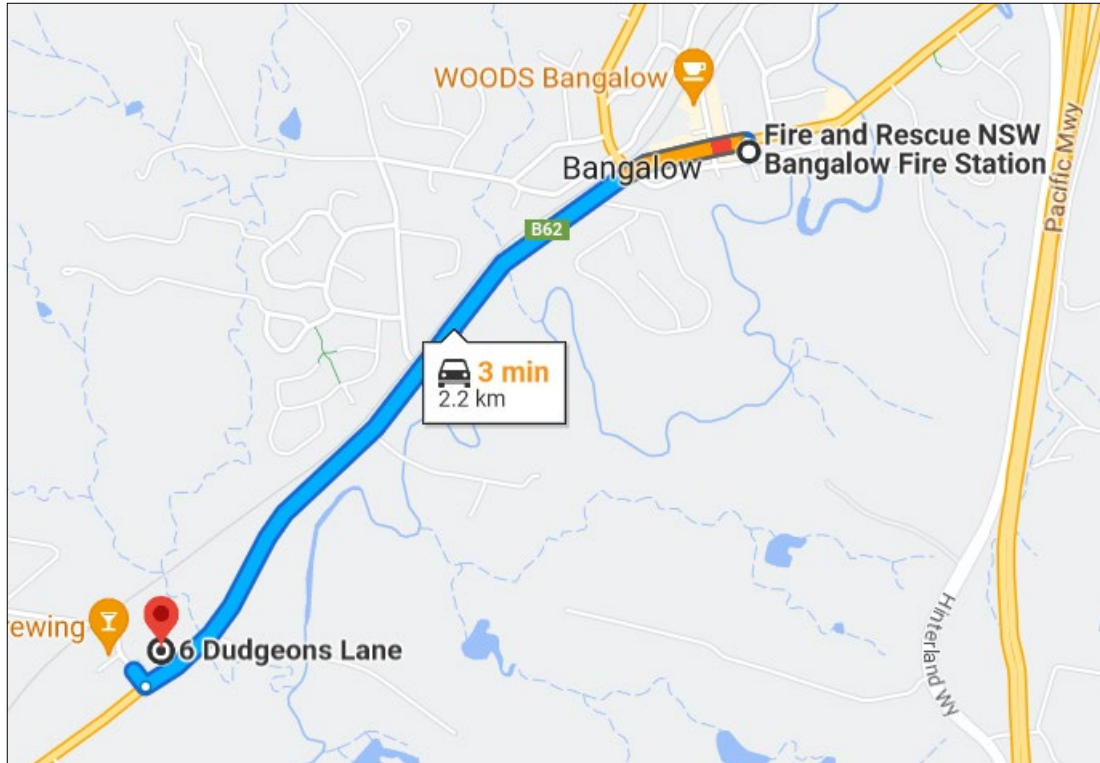


Figure 9: NSW Fire and Rescue - Bangalow

## 5. Conclusion and Recommendations

Bushfire Planning Australia has been engaged by Lighthouse Laundry Services Ltd to undertake a Bushfire Assessment Report for the proposed commercial laundry facility to operate within an existing industrial building 6 Dudgeons Lane, Bangalow.

The proposed scope of works includes a change of use of the existing building from the current macadamia processing facility to a commercial laundry, including minor internal works with several new windows and roller doors.

The National Construction Code (NCC) does not provide for any bush fire specific performance requirements for the proposed development; being a development that will facilitate the construction of non-habitable buildings. The general fire safety construction provisions of the NCC are taken as acceptable solutions in this instance.

PBP 2019 refers to the proposed industrial development as 'Other development'. Given the unique features of these developments, compliance with PBP is strongly focused in satisfying the aims and objectives of PBP 2019.

A hazard assessment has been completed and found the study area was exposed to a low bushfire hazard located to the east of the subject site. The predominant vegetation surrounding the site is consistent with a *rainforest*, namely *Sub-tropical Rainforest* vegetation formation as described in the NSW Rural Fire Service document Planning for Bushfire Protection 2019 (PBP 2019). The northern boundary is defined by an unformed Crown road reserve which continues into an open managed paddock. The nearest vegetation was assessed as a low risk due to the landscape and evidence of regular maintenance.

The following recommendations when implemented will reduce the impact of a bushfire to an acceptable level for the proposed industrial (non-habitable) buildings and demonstrate the proposed development is able to comply with PBP 2019:

1. The entire site shall be managed as an Inner Protection Area (IPA) as outlined within Appendix 4 of PBP 2019 and the RFS document *Standards for asset protection zones*;
2. The building shall be connected to a reliable water supply network and that suitable fire hydrants are located throughout the development site that are clearly marked and provided for the purposes of bushfire protection. Fire hydrant spacing, sizing and pressure shall comply with AS2419.1 2005 and Table 5.3c of PBP 2019;
3. Consideration should be given to landscaping and fuel loads on site to decrease potential fire hazards on site; and
4. All hazardous materials to be stored on land within 100m of any designated bushfire prone land shall be stored in a secure enclosure away from the bushfire hazard.

This assessment has been made based on the bushfire hazards observed in and around the site at the time of inspection and production (September 2023).

Should the above recommendations be implemented, the existing bushfire risk should be suitably mitigated to offer an acceptable level of protection to life and property for those persons and assets occupying the site, but they do not and cannot guarantee that the area will not be affected by bushfire at some time.

---

## 6. References

- ❑ NSW Rural Fire Service (2005). *Standards for Asset Protection Zones*. NSW Rural Fire Service.
- ❑ NSW Rural Fire Service (2019). *Planning for Bushfire Protection – A Guide for Councils, Planners, Fire Authorities, Developers and Home Owners*.
- ❑ Ramsay, GC and Dawkins, D (1993). *Building in Bushfire-prone Areas – Information and Advice*. CSIRO and Standards Australia.
- ❑ Rural Fires and Environmental Assessment Legislation Amendment Act 2002.
- ❑ Standards Australia (2018). *AS 3959 – 2018: Construction of Buildings in Bushfire-prone Areas*.

---

## Appendix A: Proposed Development Layout

# MICHAEL SPITERI ARCHITECTURAL DRAFTING

www.michaelspiteridrafting.squarespace.com

michaelspiteri66@bigpond.com

ph. 0417 713033

MAY 2023

JOB NO. 23.14

## PROJECT DETAILS

PROPOSED FACTORY / WAREHOUSE  
CONVERSION

LOT 4 SP 84845

LOT 4 DUDGEONS LANE. BANGALOW

## CLIENT DETAILS



WHITE BOX ENTERPRISES

COMPLYING DEVELOPMENT

## CONTENTS

SITE PLAN.....	01
LOT 2 FLOOR PLAN.....	02
LOT 4 FLOOR PLAN.....	03
ELEVATIONS 1.....	04
ELEVATIONS 2.....	05
SECTION & NOTES.....	06
SCOPE OF WORKS.....	07

## STANDARD NOTES:

ALL CONSTRUCTION WILL COMPLY WITH THE BUILDING CODE OF AUSTRALIA

DO NOT SCALE FROM DRAWING

ENSURE ALL BUILDING CONSTRUCTION WITHIN EXISTING BUILDING FOOTPRINT.

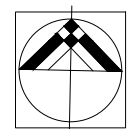
CHECK FOR UNDERGROUND OBSTACLES PRIOR TO CONSTRUCTION

CONFIRM DIMENSIONS AND RELEVANT INFORMATION ON SITE BEFORE COMMENCING WORK.

DRAWINGS TO BE READ IN CONJUNCTION ENGINEERING DRAWINGS.



## LOCALITY PLAN



COMPLYING DEVELOPMENT



Beacon LAUNDRY

**PROPOSAL ONLY** DATE 13.7.23  
NOT FOR CONSTRUCTION PURPOSES

NOTE:  
ALL NEW WORKS TO BE WITHIN  
FOOTPRINT OF EXISTING BUILDING

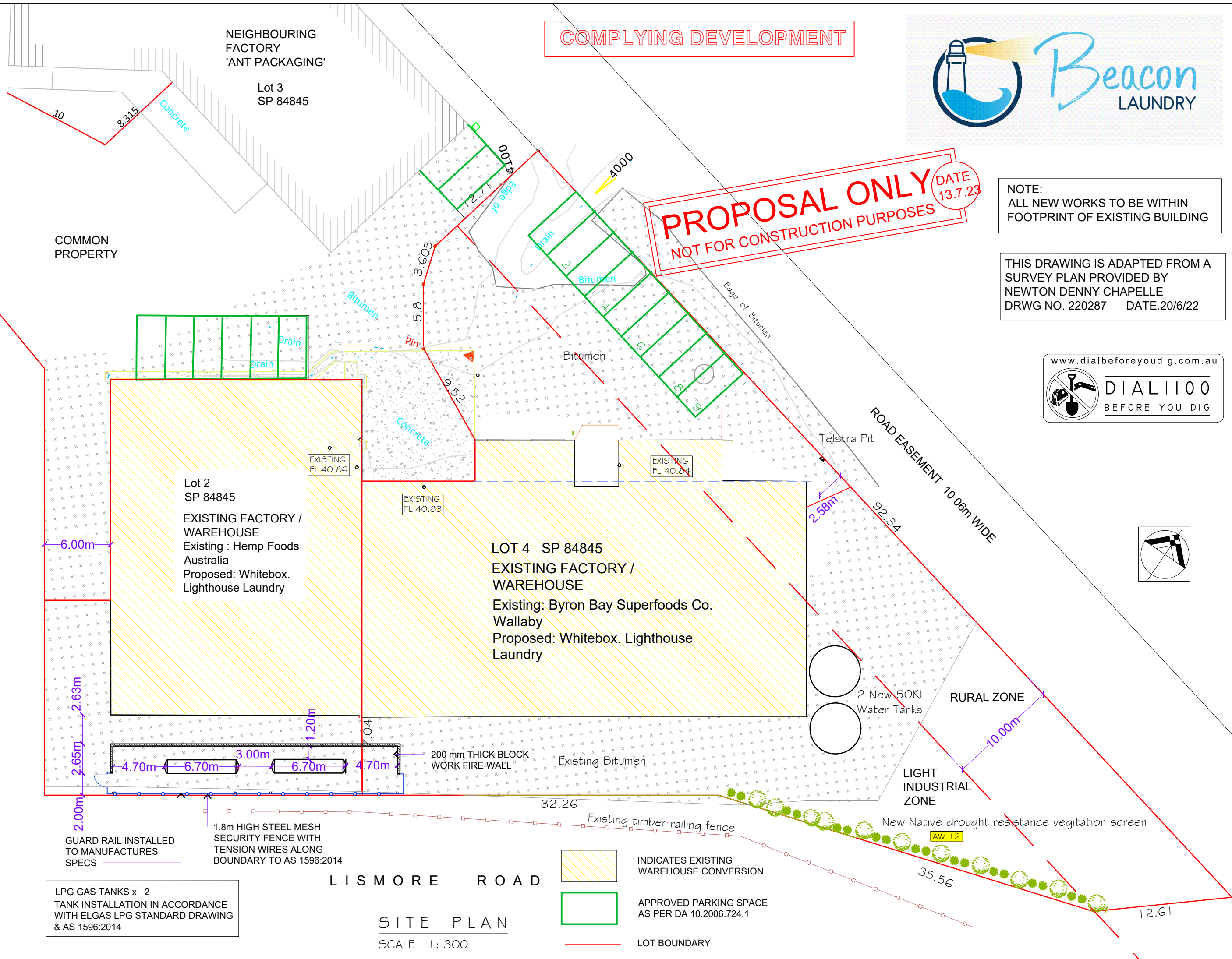
THIS DRAWING IS ADAPTED FROM A  
SURVEY PLAN PROVIDED BY  
NEWTON DENNY CHAPELLE  
DRWG NO. 220287 DATE.20/6/22



MICHAEL SPITERI ARCHITECTURAL DRAFTING  
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michaelspiteri66@bigpond.com  
ph. 0417 713033

SITE PLAN  
Scale : 1:300 @ A3  
Drwg No: 23.14.01  
Rev   
Date: MAY 2023

EXISTING FACTORY CONVERSION  
LOT 4 DUDGEONS LANE, BANGALOW  
for WHITE BOX ENTERPRISES



Lot 2 SP 84845  
EXISTING FACTORY / WAREHOUSE  
Existing : Hemp Foods Australia  
Proposed: Whitebox. Lighthouse Laundry

LOT 4 SP 84845  
EXISTING FACTORY / WAREHOUSE  
Existing: Byron Bay Superfoods Co. Wallaby  
Proposed: Whitebox. Lighthouse Laundry

NEIGHBOURING FACTORY 'ANT PACKAGING'  
Lot 3 SP 84845

COMMON PROPERTY

LPG GAS TANKS x 2  
TANK INSTALLATION IN ACCORDANCE WITH ELGAS LPG STANDARD DRAWING & AS 1596:2014

1.8m HIGH STEEL MESH SECURITY FENCE WITH TENSION WIRES ALONG BOUNDARY TO AS 1596:2014

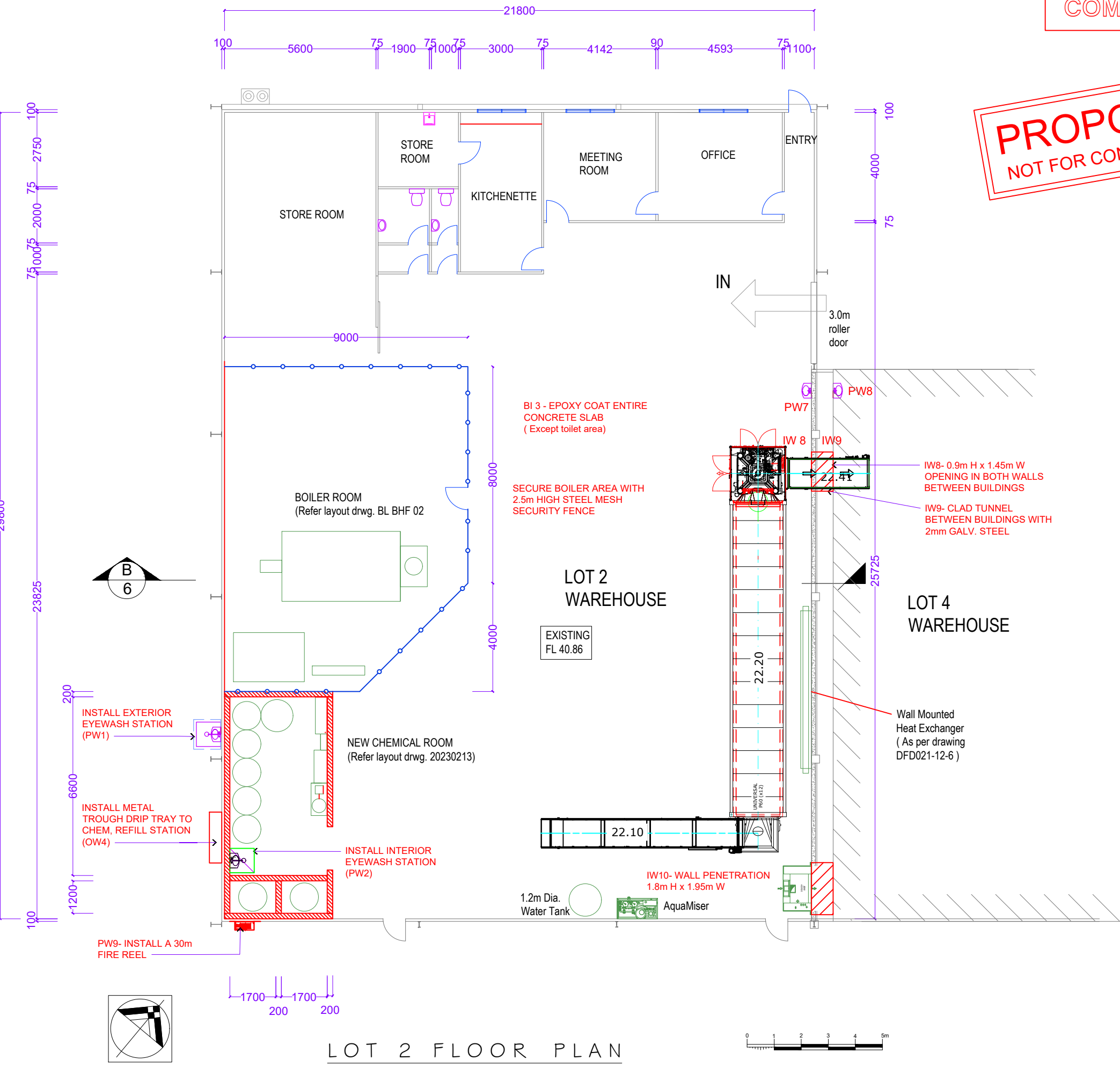
L I S M O R E R O A D

S I T E P L A N

SCALE 1 : 300

- INDICATES EXISTING WAREHOUSE CONVERSION
- APPROVED PARKING SPACE AS PER DA 10.2006.724.1
- LOT BOUNDARY

1 of 6



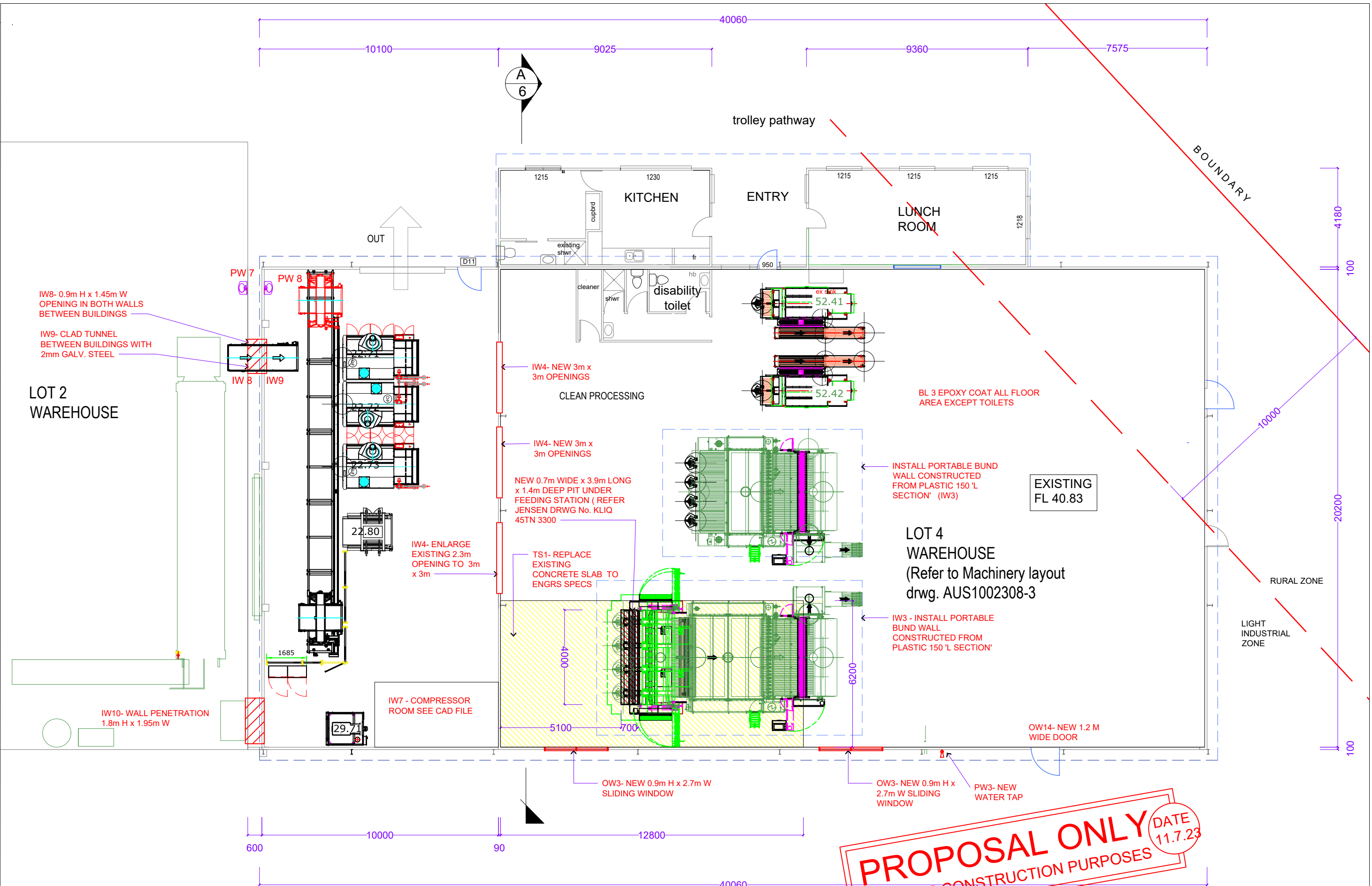
COMPLYING DEVELOPMENT

**PROPOSAL ONLY** DATE 13.7.23  
 NOT FOR CONSTRUCTION PURPOSES

NOTE:  
 ALL DIMENSIONS TO BE  
 CONFIRMED ON SITE PRIOR TO  
 CONSTRUCTION

LOT 2 FLOOR PLAN





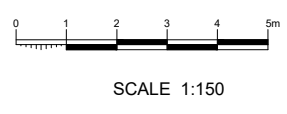
IW8- 0.9m H x 1.45m W  
OPENING IN BOTH WALLS  
BETWEEN BUILDINGS

IW9- CLAD TUNNEL  
BETWEEN BUILDINGS WITH  
2mm GALV. STEEL

LOT 2  
WAREHOUSE

IW10- WALL PENETRATION  
1.8m H x 1.95m W

- INDICATES NEW CONCRETE SLAB TO ENGRS SPECS
- EXISTING WALL
- NEW 90 TIMBER STUD WALL
- NEW INSULATED PANEL WALL

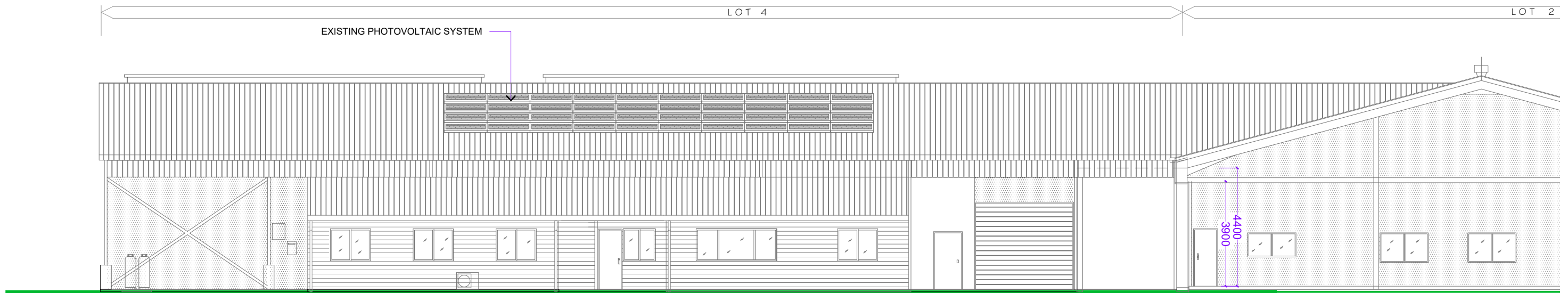


**PROPOSAL ONLY** DATE 11.7.23  
NOT FOR CONSTRUCTION PURPOSES

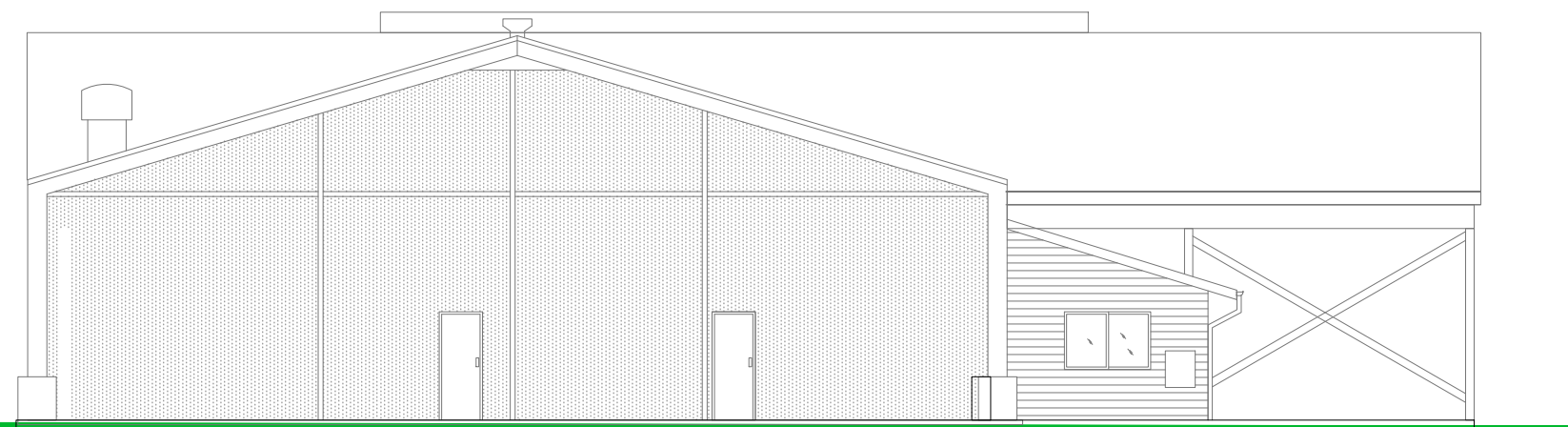
LOT 4 FLOOR PLAN

COMPLYING DEVELOPMENT

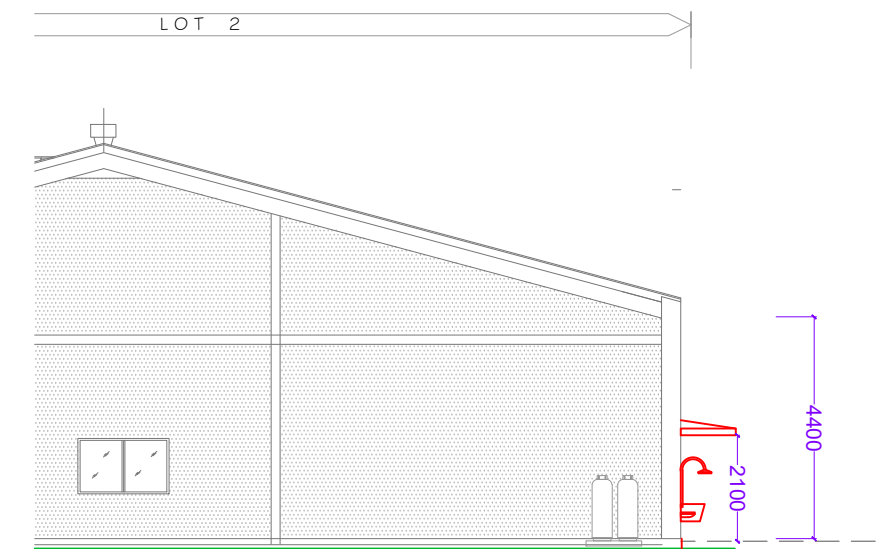




NORTH WEST ELEVATION



NORTH EAST ELEVATION



NORTH WEST ELEVATION (cont..)

**PROPOSAL ONLY** DATE 11.7.23  
 NOT FOR CONSTRUCTION PURPOSES

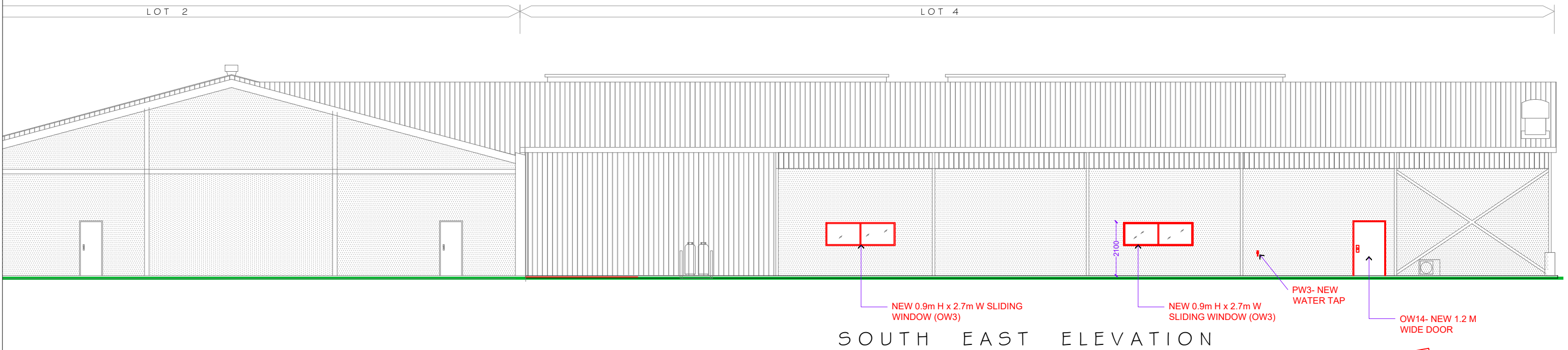
**COMPLYING DEVELOPMENT**



EXISTING FACTORY CONVERSION  
 LOT 4 DUDGEONS LANE. BANGALOW  
 for WHITE BOX ENTERPRISES

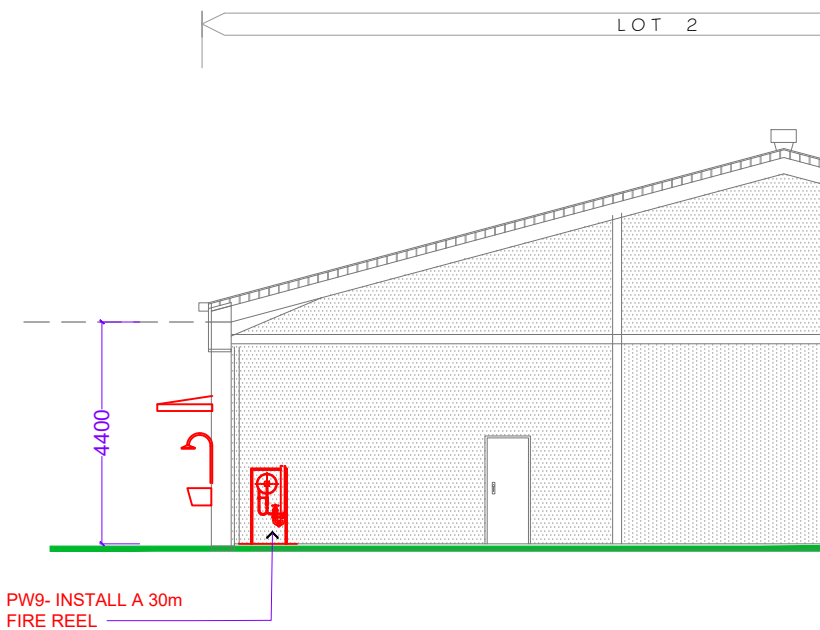
ELEVATIONS 1  
 Scale : 1:150 @ A3  
 Drwg No: 23.14.04  
 Rev  4 of 7  
 Date: MAY 2023



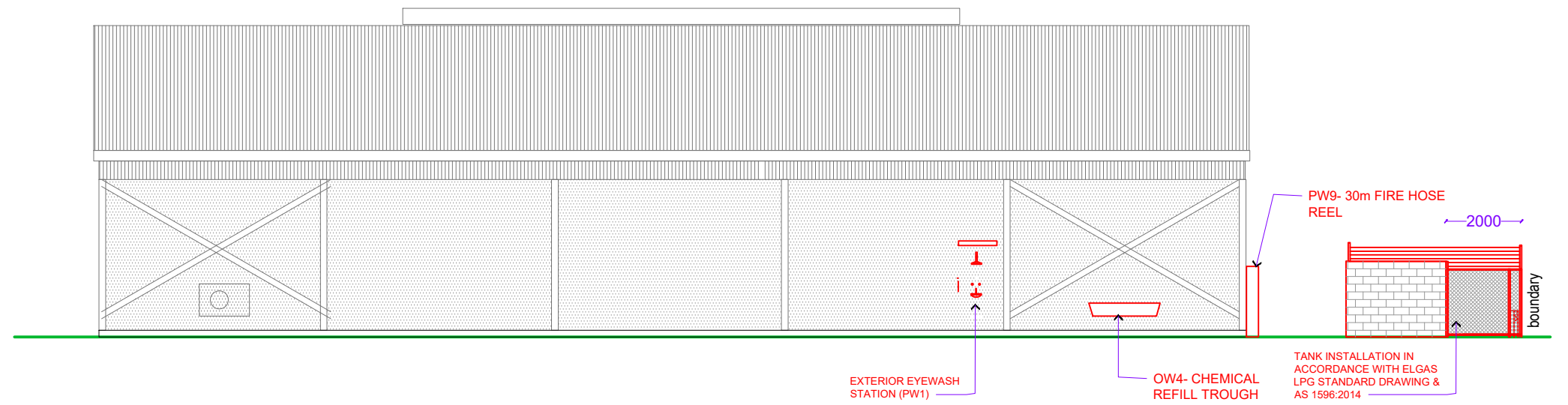


SOUTH EAST ELEVATION

**PROPOSAL ONLY** DATE 13.7.23  
 NOT FOR CONSTRUCTION PURPOSES



SOUTH EAST ELEVATION ..(cont)



SOUTH WEST ELEVATION

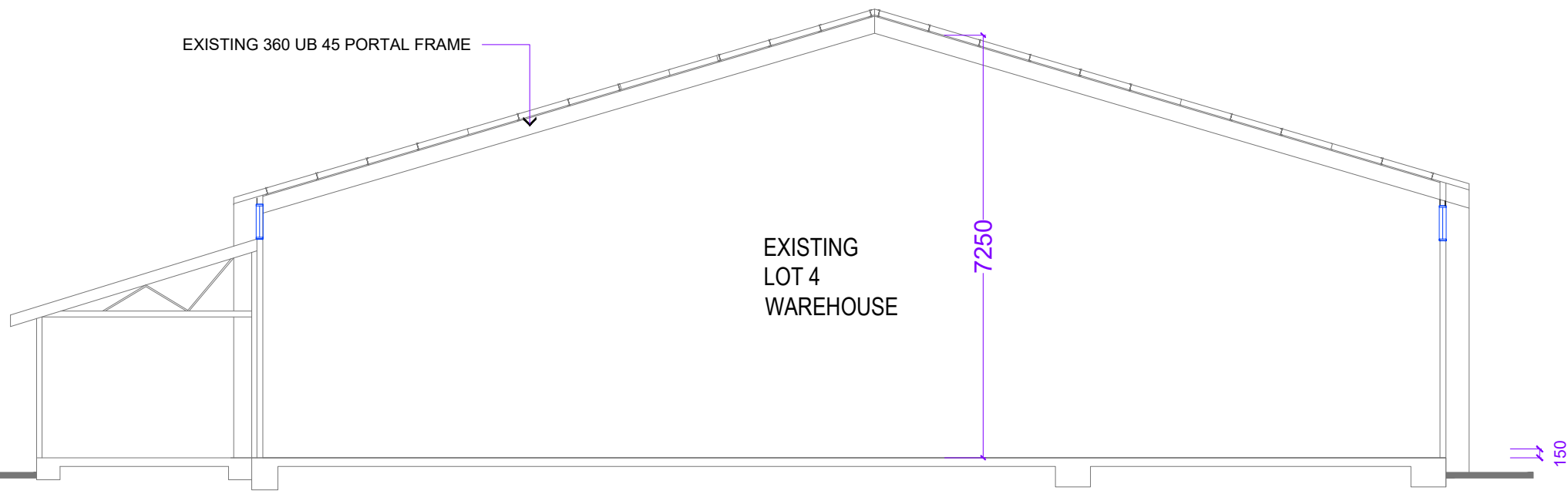
COMPLYING DEVELOPMENT

EXISTING FACTORY CONVERSION  
 LOT 4 DUDGEONS LANE. BANGALOW  
 for WHITE BOX ENTERPRISES

ELEVATION 2  
 Scale : 1:150 @ A3  
 Drwg No: 23.14.05  
 Rev  5 of 7  
 Date: MAY 2023

**MICHAEL SPITERI ARCHITECTURAL DRAFTING**  
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 ph. 0417 713033

EXISTING 360 UB 45 PORTAL FRAME



EXISTING  
LOT 4  
WAREHOUSE

7250

150

SECTION

A

03

SCALE 1.100

**PROPOSAL ONLY** DATE 13.7.23  
 NOT FOR CONSTRUCTION PURPOSES

**NOTES**

ALL WORKS TO COMPLY WITH BUILDING CODE OF AUSTRALIA 2019, BE IN ACCORDANCE WITH RELEVANT AUSTRALIAN STANDARDS AND LOCAL COUNCIL REGULATIONS / APPROVALS

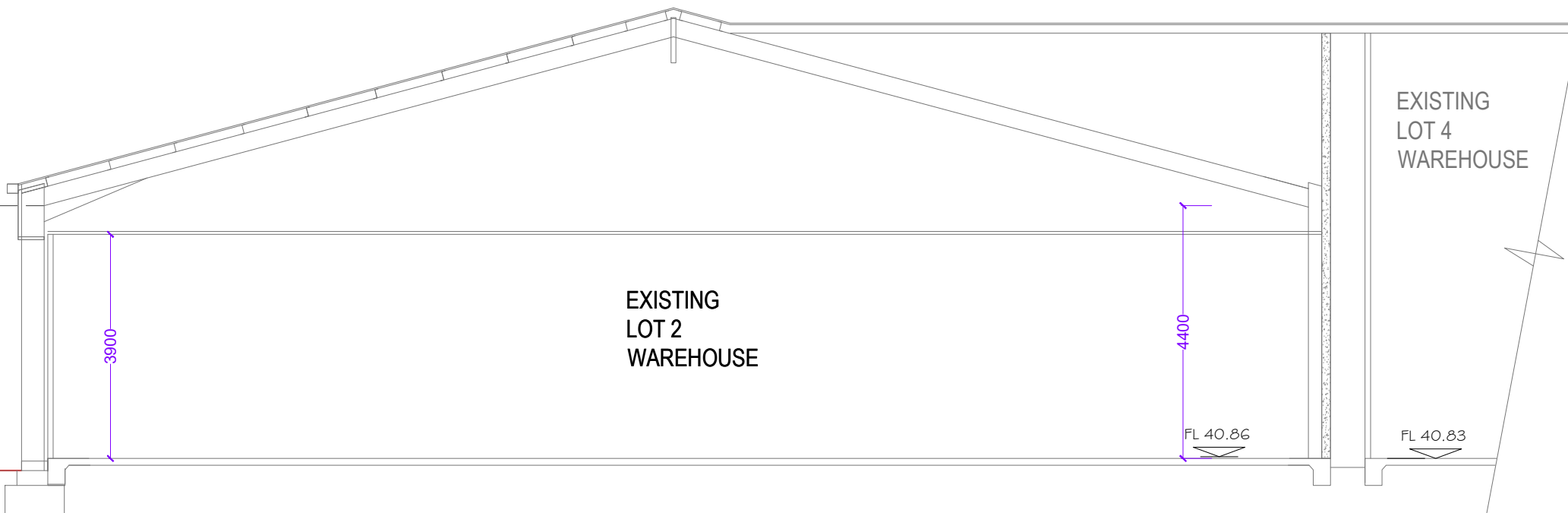
- AS 1684 TIMBER FRAMING CODE
- AS 3740 WATERPROOFING OF WET AREAS
- AS 2047 WINDOWS IN BUILDINGS
- PHOTOELECTRIC SMOKE DETECTORS IN ACCORDANCE WITH BCA 2019 VOLUME 1 CLAUSE E2 . SPEC E2.2 CLAUSE 3 TO AS3786-2014.
- ALL VERANDAHS AT LEVELS GREATER THAN 1000 MM TO HAVE HANDRAIL ASSEMBLIES IN ACCORDANCE WITH BCA 3.9.1 & 3.9.2
- INSULATION INSTALLED IN ACCORDANCE WITH BCA PART 3.12.1.1
- FLOORS, WALLS & CEILINGS TO BE OF, OR COVERED BY MATERIALS THAT COMPLY WITH BCA CLAUSE C1.10; SPEC. C1.10 & C1.10a
- ALL DOOR HANDLES TO COMPLY WITH BCA VOL 1 CLAUSE D2.21
- ALL GLAZING AS1288-2006 & AS2047-1999. BCA PART J2
- DISABILITY ACCESS, FACILITIES AND CIRCULATION SPACE IN ACCORDANCE WITH PART D3 OF THE BCA & AS1428.1 & AS1428.4
- ALL EXITS & PATHS OF TRAVEL TO AN EXIT FROM ANY POINT WILL COMPLY WITH CI D1.6 OF THE BCA

ALL DIMENSIONS TO BE VERIFIED BY BUILDER/ CLIENT PRIOR TO SETOUT, ORDERING OR FABRICATION OF NEW MATERIALS

CHECK FOR UNDERGROUND OBSTACLES PRIOR TO CONSTRUCTION

DO NOT SCALE FROM DRAWING

ENSURE ALL NEW CONSTRUCTION WITHIN BUILDING ENVELOPE



EXISTING  
LOT 2  
WAREHOUSE

EXISTING  
LOT 4  
WAREHOUSE

4400

3900

4400

FL 40.86

FL 40.83

SECTION

B

02

SCALE 1.100

**COMPLYING DEVELOPMENT**

## SCOPE OF WORKS

Building	Plan	Item	Trade	Scope
Lot 2 & 4	Complying Development Plan	AW12	Landscaper	Plant native drought resistant species of shrubs/bushes along the entire inside of the wooden fence on the southern side of Lot 4 and Lot 2, to allow for a visual barrier to grow up to about 4 metres in height.
Lot 2 & 4	Complying Development Plan	BL3	Epoxy Company	Prepare the slabs as required and epoxy all floors as marked on plans in colour TBC, with a flat/smooth non-textured surface.
Lot 4	Complying Development Plan	DM1	Concreter	Cut up and remove existing insulated concrete slab in Cold Store (6,200 x 6,000 mm) and Dry Goods Store area (6,825 x 6,200 mm) in preparation for new more robust slab to go in.
Lot 2 & 4	Complying Development Plan	IW10	Carpenter	Cut a 1,800mm H x 1,950 mm W opening in the two walls separating the two buildings (Lot 2 and Lot 4) to connect them/bridge the 600mm void with a "tunnel", to allow for the installation of the barrier washer.
Lot 2 & 4	Complying Development Plan	IW11	Carpenter	Clad the tunnel between the two buildings (IW10) with 2mm galvanised steel and level out/resurface floor to make sure trolleys can access the exit door of the barrier washer to empty washed laundry.
Lot 4	Complying Development Plan	IW2	Concreter	Cut out and excavate and construct a concrete pit under the 2-roll ironer as per specs from the laundry machinery supplier (L 3,900 x W 700 x D 1,400 mm). Seal the concrete surface of the pit with epoxy paint (colour to be nominated), to protect line from contact with the concrete walls. Ensure the concrete is sealed from water ingress.
Lot 4	Complying Development Plan	IW3	Carpenter	Design, supply and install a semi-portable bund around the 2-roll ironer and the 1-roll ironer. E.g. a plastic L-beam screwed/glued to the floor and sealed from water ingress in both directions, to protect machines from future flooding events. Height of bund must be 150mm.
Lot 4	Complying Development Plan	IW4	Carpenter	Remove existing sliding door in the existing wall separating the dryer room from the flatworks area, and widen the opening from its current 2,300 mm to 3,000 mm (minimum 2,700 mm required for Jensen's equipment), and cut two new openings in the fridge panel wall as per the drawings to match the same dimensions (3,000mm W, and 3,000 mm H), and trim all the cut edges on all three door ways nicely.
Lot 2	Complying Development Plan	IW5	Block Layer	Supply and build a chemical room with a block wall and internal vessel bunds as per chemical supplier's specifications. All surfaces internally in the bunds need to be sealed as per chemical supplier's specifications (TBC).
Lot 2	Complying Development Plan	IW6	Carpenter	Supply and install a 2.5m high chain link fence, with a lockable chain link fence door in it, to close off the boiler area from unauthorised access.
Lot 2	Complying Development Plan	IW7	Carpenter	Design and build a compressor room by reusing the demounted fridge panels and reusing a door from the demolition (from items DM2 and DM7) (specifications of size of room to be provided).
Lot 2 & 4	Complying Development Plan	IW8	Concreter	Cut a 900mm H x 1,450 mm W opening in the two walls separating the two buildings (Lot 2 and Lot 4) to connect them/bridge the 600mm void with a "tunnel", to allow for the laundry conveyor to be installed connecting the two buildings.
Lot 2 & 4	Complying Development Plan	IW9	Carpenter	Clad the tunnel between the two buildings (IW8) with 2mm galvanised steel.
Lot 2 & 4	Complying Development Plan	OW13	Block Layer	Supply and build a 4-hour fire rated core filled block wall as per ELGAS specs, around the two LPG tanks along the southern wall of the buildings.
Lot 4	Complying Development Plan	OW14	Carpenter	Supply and install a 1,200 mm wide door for trolley entry on the eastern side of the southern wall.
Lot 4	Complying Development Plan	OW3	Carpenter	Supply two (2) off x fixed-slider windows, H 900mm x W 2,700 mm, and install in the southern fridge panel wall as shown on plan. Assess and advice if the window frame can sit directly in the fridge panel wall or if structural support is required.
Lot 4	Complying Development Plan	OW7	Structural steel worker	Supply and install armco guard rails around the pad as per ELGAS' specs.
Lot 2	Complying Development Plan	PW1	Plumber	Supply and install an eye wash station externally towards the southern end of the western wall of the building (Lot 2) in proximity to the chemical onloading station (refer to item OW4), as shown on plan.
Lot 2	Complying Development Plan	PW2	Plumber	Supply and install an eye wash station in the chemical room (refer to item IW5).
Lot 4	Complying Development Plan	PW3	Plumber	Supply and install a water hose tap towards the eastern end of the southern side of the building as shown on plan.
Lot 2	Complying Development Plan	PW6 (OW4)	Plumber	Connect the metal trough drip tray (OW4) underneath the chemical refill station (supplied and installed by others) to trade waste.
Lot 2	Complying Development Plan	PW7	Plumber	Supply and install a handwash sink with "hip start" on the barrier wall between the two buildings, close to the loading dock roller door on the soiled side of the laundry.
Lot 4	Complying Development Plan	PW8	Plumber	Supply and install a handwash sink with "hip start" on the barrier wall between the two buildings (to mirror/align with PW7), close to the loading dock roller door on the clean side of the laundry.
Lot 2	Complying Development Plan	PW9	Plumber	Supply and install a 30m fire house reel in the South eastern corner of Lot 2, to cover the LPG tank area.
Lot 4	Complying Development Plan	TS1	Concreter	Re-concrete the Cold Store area (6,200 x 6,000 mm) and Dry Goods Store area (6,825 x 6,200 mm) where the concrete has been removed under demolition work (item DM1). Improved slab should match existing surrounding slab in load capabilities.

PROPOSAL ONLY DATE 13.7.23  
 NOT FOR CONSTRUCTION PURPOSES



COMPLYING DEVELOPMENT

### SCOPE OF WORKS

Scale : NA  
 Drwg No: 23.14.07  
 Rev  7 of 7  
 Date: MAY2023

**EXISTING FACTORY CONVERSION  
 LOT 4 DUDGEONS LANE. BANGALOW  
 for WHITE BOX ENTERPRISES**



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## Appendix B: AHIMS Search Results

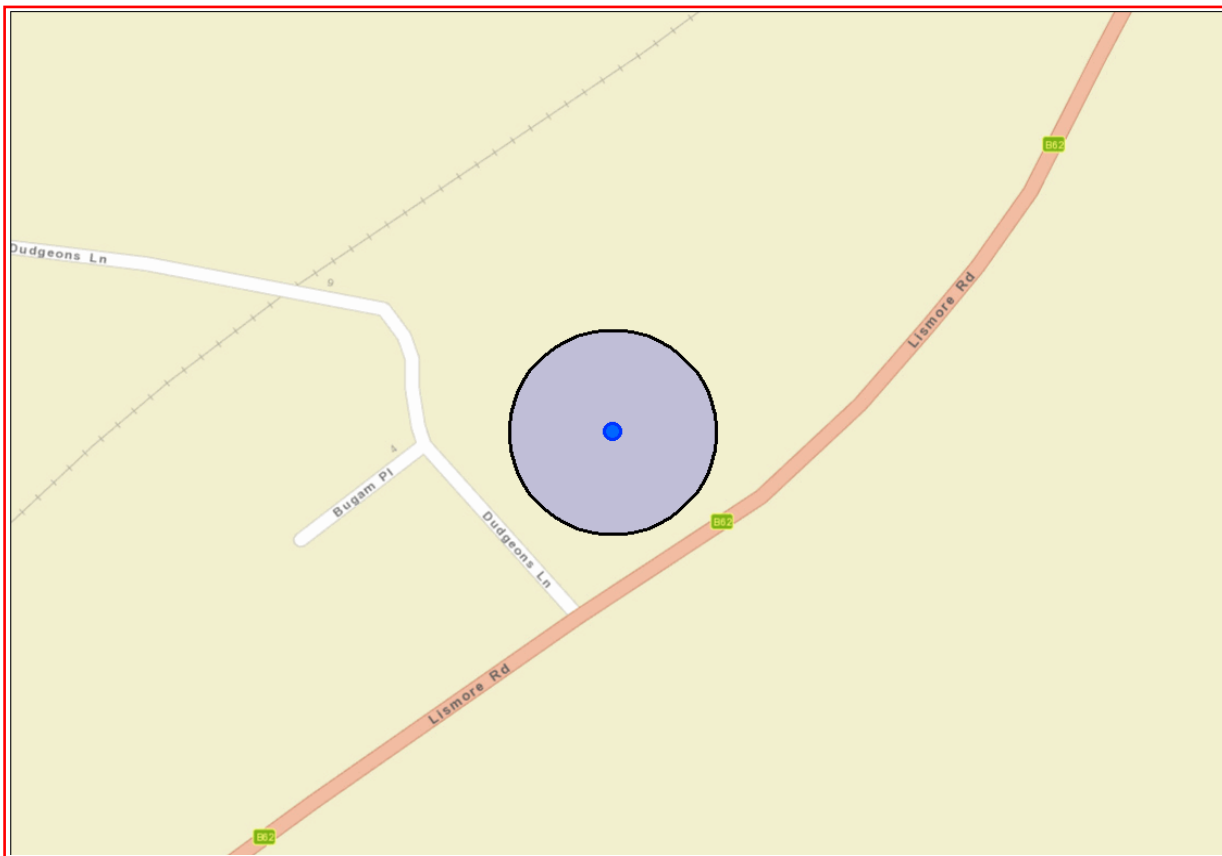
Katrina Greville  
21 Costata Crescent  
Adamstown New South Wales 2289  
Attention: Katrina Greville  
Email: klmukevski@bigpond.com

Date: 14 September 2023

Dear Sir or Madam:

**AHIMS Web Service search for the following area at Address : 6 DUDGEONS LANE BANGALOW 2479 with a Buffer of 50 meters, conducted by Katrina Greville on 14 September 2023.**

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

<b>0</b>	<b>Aboriginal sites are recorded in or near the above location.</b>
<b>0</b>	<b>Aboriginal places have been declared in or near the above location. *</b>

### **If your search shows Aboriginal sites or places what should you do?**

- You must do an extensive search if AHIMS has shown that there are Aboriginal sites or places recorded in the search area.
- If you are checking AHIMS as a part of your due diligence, refer to the next steps of the Due Diligence Code of practice.
- You can get further information about Aboriginal places by looking at the gazettal notice that declared it. Aboriginal places gazetted after 2001 are available on the [NSW Government Gazette \(https://www.legislation.nsw.gov.au/gazette\)](https://www.legislation.nsw.gov.au/gazette) website. Gazettal notices published prior to 2001 can be obtained from Heritage NSW upon request

### **Important information about your AHIMS search**

- The information derived from the AHIMS search is only to be used for the purpose for which it was requested. It is not to be made available to the public.
- AHIMS records information about Aboriginal sites that have been provided to Heritage NSW and Aboriginal places that have been declared by the Minister;
- Information recorded on AHIMS may vary in its accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in these recordings,
- Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain Aboriginal sites which are not recorded on AHIMS.
- Aboriginal objects are protected under the National Parks and Wildlife Act 1974 even if they are not recorded as a site on AHIMS.
- This search can form part of your due diligence and remains valid for 12 months.