



NSW RURAL FIRE SERVICE



ATT Graham Towers
Team Leader - Southern Region
Department of Planning and Environment
PO Box 5475
Wollongong NSW 2500

CC ATT Nathan Farnell
The General Manager
Eurobodalla Shire Council
PO Box 99
MORUYA NSW 2537

Your Ref: E13.7173
Our Ref: LEP/0044 & R18/875

25 June 2019

Dear Graham

Post exhibition NSW RFS comments - Eurobodalla Planning Proposal (Rural Lands and Other Matters) Amendments to Eurobodalla LEP 2012

The New South Wales Rural Fire Service (NSW RFS) is responsible for providing communities with bush fire protection. This is partly achieved through our legislative role in the NSW planning system (including strategic planning and development control) as well as our broader work in community resilience and as the lead combat agency for bush fire fighting in NSW.

With regard to the Eurobodalla Planning Proposal (Rural Lands and Other Matters) Amendments to Eurobodalla LEP 2012, the NSW RFS has consulted with Council throughout the preparation of the Draft Rural Lands Strategy, and subsequent Planning Proposal, as outlined below:

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NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

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- Letter dated 4 December 2015 on Draft ESC Rural Land Strategy
- Letter dated 12 July 2016 on Draft Planning Proposal Rural Land Strategy
- Multi day site inspection held from the 27-30 September 2016 including attendance from the Department of Planning and Environment (DoPE), Office of Environment and Heritage (OEH) and Council.
- Letter dated 28 June 2018 on the exhibition of the Eurobodalla Planning Proposal (Rural Lands and Other Matters) Planning Proposal
- Meeting held 4 February 2019 with (DoPE), Local Member Andrew Constance, Council's General Manager and Director of Planning to discuss specific sites and concerns raised in previous correspondence
- Meeting held 6 February 2019 with Council to discuss specific sites and concerns raised in previous correspondence
- Meeting held 21 May 2019 with DoPE, Local Member Andrew Constance and Council's Mayor and Director of Planning
- Letter dated 31 May 2019 outlining the NSW RFS amended comments pertaining to areas within Item 5 of the planning proposal. This included an attached table clearly outlining the constraints and future required bush fire protection measures for a number of areas within the planning proposal.
- Meeting held 12 June 2019 with DoPE, OEH to discuss specific sites and areas of concern.

As previously advised, the NSW RFS prepared a table in relation to Item 5 of the Planning Proposal. This table outlined the bush fire considerations applicable to future development specific to each 'Area'.

Council was advised in our letter dated 31 May 2019 that the comments contained in our table applied only where increased densities were proposed. Council responded via email dated 11 June 2019 identifying that a number of areas were not subject to any increased density.

It is important to note that the attached table from the NSW RFS, outlining our comments on the sites within Item 5 of the Planning Proposal, was prepared in consideration of the following:

- It was Council's clear preference that the matters raised by the NSW RFS for a significant number of sites, be dealt with through the subsequent development assessment process, and not through the strategic planning/rezoning phase of the process.
- The information provided by Council did not clearly identify which specific sites were subject to increased densities within their nominated 'Area', as such the NSW RFS proceeded to use the information submitted to determine to the best of its ability where increased densities are proposed and commented accordingly. There is scope for this assumption to be incorrect.
- Council's advice that specific sites were not subject to increased densities as they had (i) an existing dwelling or (ii) an existing dwelling entitlement, were accepted by the NSW RFS. The NSW RFS assumes that sites referenced as having an existing dwelling are lawful dwellings. Similarly, the Council's advice that sites have dwelling entitlements were accepted as it is the role of the approval authority (DoPE) to satisfy itself that Council's advice is accurate.

The attached table identifies where areas/sites are known to require particular development outcomes, including additional bush fire protection measures, as part of any future development. This is provided to assist Council in ensuring that a suitable level of bush fire protection is afforded to future residents and fire fighters in their role as approval authority.

The NSW RFS recommends the additional bush fire protection measures outlined in the table are made known to current/future land owners and developers, via a suitable mechanism (i.e. Development Control Plan). This is to ensure they are aware of bush fire considerations and requirements associated with future residential/rural residential occupation of the land.

The NSW RFS advises Council that there remains a small number of sites, identified in the attached table, where the level of bush fire risk combined with the lack of adequate infrastructure has resulted in the sites being considered inappropriate for residential/rural residential occupation of the land.

As demonstrated above, the NSW RFS is committed to working through this Planning Proposal to achieve the best possible outcome for the community and our fire fighters. In this regard the significant majority of the Planning Proposal is supported by the NSW RFS.

For any enquiries regarding this correspondence or to discuss the matters raised in this letter further please contact Martha Dotter on (02) 4472 0600.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Jeff Lucas', with a stylized, cursive script.

Jeff Lucas

Director Planning and Environment Services

Item 5 - Amend Zoning and Minimum Lot Size Maps – As amended by NSW RFS dated 25 June 2019 resulting from additional information provided by Eurobodalla Council on the 11 June 2019.

Column A	Column B	Column C	Column D	Column E	Column F
Area	Zone	Proposed Minimum lot size	Potential increase in lots and dwellings	RFS comment	RFS Identified Constraints and Required Bush Fire Protection Measures
1. Kings Hwy, Murrenengenberg	RU1	200ha	Nil	No objection – no increased density	No comment
1a. Kings Hwy, Currowan	RU1	40ha	Nil	No objection – no increased density	No comment
2. Nelligen Creek Rd, West Nelligen	RU1	40ha	3 lots and 3 dwellings	No objection – subject to future development satisfying any constraints identified in Column F.	- Lot 29//1058243 (Kings Highway Nelligen), Access required via Nelligen Creek Road to the south and not via forestry trails to the north. - Lot 10//871181 (28 Nelligen Creek Road) access via Nelligen Creek road. - Lot 20//755908 (351 Nelligen Creek Road) Dwelling requires 10KW APZs and BAL 29 construction to shelter onsite and to be built in close proximity to the access servicing the site.
3. Old Bolaro Road (south), West Nelligen	RU4	10ha	1 lot and 3 dwellings	No objection – subject to future development complying with Planning for Bushfire Protection	No Comment

Column A	Column B	Column C	Column D	Column E	Column F
Area	Zone	Proposed Minimum lot size	Potential increase in lots and dwellings	RFS comment	RFS Identified Constraints and Required Bush Fire Protection Measures
3a. Old Bolaro Road (central), West Nelligen	RU4	5ha	1 lot and 5 dwellings	No objection – subject to future development satisfying any constraints identified in Column F.	- Lot 28//1058243 (86 Allards Lane Nelligen) Access via Allards Lane and future dwelling/subdivision to provide for future dwellings to be located north of paper road bisecting the lot, which runs east/west. - Lot 8//1240100, Old Bolaro Road Nelligen – 3 part split lot) future dwelling/subdivision to provide for future dwellings to be in northern most located split lot or portion of split lot located east of Old Bolaro Road to ensure adequate APZs can be achieved within the site. - Lot 35//1077080 (59 Old Bolaro Road Nelligen) Future dwelling/subdivision to provide for future dwelling to be located north of paper road bisecting the lot, which runs east/west.
4. Currowan, Benandarah and East Lynne	RU1	40ha	4 lots and 6 dwellings	4 (north) Objection retained – see comments in Column F	4 (north) - Lots in the northern portion of Area 4 (Donovan Creek Road) and not within close proximity of the Princess Highway to the east are not considered appropriate for increased density. Including Lot 1//6635327 - Areas in the northern portion of Area 4 (Wild Pig Road) and not within the large cleared areas along the Clyde River are not considered appropriate for increased density. Including lots 1//789278 and 1//619285.

Column A	Column B	Column C	Column D	Column E	Column F
Area	Zone	Proposed Minimum lot size	Potential increase in lots and dwellings	RFS comment	RFS Identified Constraints and Required Bush Fire Protection Measures
				Updated RFS response: No Objection – see comments in Column F	Updated RFS response: Following further advice from Eurobodalla Council received by RFS on 11 June 2019 that all lots have existing dwellings and provide for no further subdivision – objection removed. Notwithstanding, it is noted that future development in this location will likely require additional bush fire protection measures to those outlined in the acceptable solution pathway of Planning for Bush Fire Protection.
				4 (south) No objection – subject to future development satisfying any constraints identified in Column F	4 (south) Dwellings requires 10KW APZs to shelter onsite and BAL 29 construction and to be built in close proximity to the public road servicing the lots.
4a. Princes Hwy, Benandarah	RU4	40ha	1 lot and 3 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Lot 16//755904 (144 Durras Drive Benandarah) Dwelling requires access via existing cleared areas.
4b. South Durras	RU1	40ha	Nil	No objection – no increased density	No comment
4c. Maloneys Beach	RU1	100ha	Nil	No objection – no increased density	No comment

Column A	Column B	Column C	Column D	Column E	Column F
Area	Zone	Proposed Minimum lot size	Potential increase in lots and dwellings	RFS comment	RFS Identified Constraints and Required Bush Fire Protection Measures
5. West Batemans Bay	RU1	40ha	Nil	No objection – no increased density	No comment
6. North and West Mogo	RU4	20ha	7 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to the public road.
6a. Goba Lane, Mogo	RU1	40ha	Nil	No objection – no increased density	No comment
7a. George Bass Drive (East), Malua Bay	E4	10ha	1 dwelling	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to the public road.
7b. George Bass Drive (West), Malua Bay	RU1	40ha	1 lot and 2 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to George Bass Drive.

Column A	Column B	Column C	Column D	Column E	Column F
Area	Zone	Proposed Minimum lot size	Potential increase in lots and dwellings	RFS comment	RFS Identified Constraints and Required Bush Fire Protection Measures
8. Dunns Creek Road (North), Woodlands	RU4	20ha	6 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to Dunns Creek road.
8a. Tomakin Rd and Dunns Creek Rd (South), Woodlands	RU4	10ha	1 lot and 2 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to the Tomakin Road/Dunns Creek Road.
8b. Tomakin Road, Mogo	RU4	20ha	3 lots and 3 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	- Lot 2//1002045, Lot 2//716598 Future dwellings to be located within close proximity to the Tomakin road.
9. South Mogo	RU1	40ha	1 lot and 2 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	- Lot 1//875990, Future dwellings to be located within close proximity to the public road.

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
9a. Maulbrooks Road, Mogo	RU4	10ha	1 dwelling	No objection – subject to the comments provided in column F and future development satisfying any constraints identified in Column F	- Lot 26//755963 (416 Maulbrooks Road, Mogo) Council advises Lot 26 already has a dwelling entitlement, if correct No Objection. If Lot 26 gains a dwelling entitlement/subdivision potential through this process then the RFS objects as RFS has concerns this lot is not suitable for residential development. - Lot 53//755963 (332 Maulbrooks Road Jeremadra) requires legal and practical access across privately owned property off Maulbrooks Road, Dwelling requires 10KW APZs to shelter onsite and BAL 29 construction.
10. Jeremadra Grove and Goldfields Drive, Jeremadra	RU4	10ha	7 lots and 7 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to the public road. Dwelling/subdivision of lots below will require a performance solution to comply with Planning for Bush Fire Protection: - Lot 3//248634 (Princes Highway Jeremadra) - Lot 40//792157 (25 Old Mossy Point Road Jeremadra). - Lot 6//DP248634 (54 JEREMADRA GROVE), JEREMADRA 2536 - Lot 7//DP248634(111 GOLDFIELDS DRIVE), JEREMADRA 2536 - Lot 8//DP248634 (26 JEREMADRA GROVE), JEREMADRA 2536

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
					- Lot 9//DP248634 (109 OLD MOSSY POINT ROAD), JEREMADRA 2536 - Lot 41//DP792157 (2 OLD MOSSY POINT ROAD), JEREMADRA 2536
10a. Springwater Road, Jeremadra and George Bass Drive, Broulee	RU1	40ha	1 lot and 3 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to the public road. Below listed lots require a performance solution to comply with Planning for Bush Fire Protection: - Lot 544//DP736015 (1511 SPRINGWATER ROAD, JEREMADRA 2536) - 1//DP63437 (238 OLD MOSSY POINT ROAD, JEREMADRA 2536) - Lot 16//DP1158098 (SPRINGWATER ROAD, JEREMADRA) 2536
11. Broulee Road, Broulee	RU4	10ha	2 lots and 3 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to Broulee road.

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
11a. Broulee Road, Bimbie and Broulee	RU1	100ha	1 lot and 3 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to Broulee Road, Princes Highway and George Bass Drive.
12. Tomakin, Rosedale and Guerilla Bay	RU1	40ha	Nil	No objection – no increased density	No comment
12a. George Bass Drive, Mossy Point	E4 and E2	1000m ² (E4)	19 lots and 20 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to Public access road.
13. Clouts Road, Mogendaoura	RU1	100ha	2 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to provide 10KW APZs for onsite refuge.

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
14. Hawdons Road, Mogendoura	RU1	40ha	4 lots and 6 dwellings	No objection to – subject to future development satisfying any constraints identified in Column F	Future dwellings of below listed lots to be located within close proximity to Larrys Mountain Road in the north east - Lot 2//DP1226774 (377-379 LARRYS MOUNTAIN ROAD, MOGENDOURA 2537) Future dwellings of below listed lots to provide 10KW APZs for onsite refuge - Lot 852//DP839121 (377-379 LARRYS MOUNTAIN ROAD, MOGENDOURA 2537) The site is heavily constrained, and subdivision of this site into 5 lots should be via a cluster subdivision where dwellings were restricted to the far south east of the site, which would still require additional APZs and perimeter roads. - Lot 1//DP194794 (244 HAWDONS ROAD, MOGENDOURA 2537)
15. North Moruya	RU1*	100ha*	Nil	No objection – no increased density	No comment

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
16. East - Malabar Drive and Percy David Drive, 16. West - Meadows Road	RU4	10ha	6 lots and 7 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	East Future dwellings to be located within close proximity to Malabar Drive/ Percy Davis Drive and where accessed via Bushland Drive, a 10KW APZs for onsite refuge and BAL 29. West Future dwellings off Maulbrooks Road (off Larrys Mountain Rd) and Meadows Road to be located in close proximity to Maulbrooks Rd/Meadows Rd and provide a 10KW APZ for onsite refuge and BAL 29 construction.
17. East Moruya	RU1*	40ha*	5 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to Public access road.
17a. South Head Road, Moruya Heads	RU4*	40ha	1 dwelling	No objection – subject to future development satisfying any constraints identified in Column F	Below listed lot is land locked, practical and legal access to be provided from adjoining property to the east off Hazel Road. Future dwelling to provide 10KW APZs for onsite refuge and BAL 29. - Lot 130//DP752151 (143 HAZEL ROAD, MORUYA HEADS 2537)
17b. Congo Road, Moruya Heads	RU1	100ha	1 lot and 1 dwelling	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to Congo Road and provide 10KW APZs for onsite refuge.

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
18. Congo Road (North), Congo	RU1	40ha	1 lot and 4 dwellings	No objection – subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to Congo Road and provide 10KW APZs for onsite refuge.
18a. Berriman Drive, Congo	RU4	10ha	1 dwelling	No objection as largely not mapped as bush fire prone land	No comment
18b. Congo Road (South), Congo	RU4	10ha	1 dwelling	No objection– subject to future development satisfying any constraints identified in Column F	Below listed lot is land locked, practical and legal access to be provided from adjoining property to the south off Congo Road Future dwelling to provide 10KW APZs for onsite refuge and BAL 29. - Lot 269//DP752137 (CONGO ROAD, CONGO 2537)
18c. Meringo Road, Meringo	RU1	40ha	1 lot and 2 dwellings	No objection– subject to future development satisfying any constraints identified in Column F	Future dwellings to be located within close proximity to Meringo Road
19. Wamban Road (South), Wamban	RU1	500ha	Nil	No objection – no increased density	No comment
20. Bergalia	RU1	100ha	1 lot and 8 dwellings	Objection – The RFS does not support increased densities in the western portion of Area 20. - Lots 36, 43, 44, 45 DP 752129 Updated RFS response: • Objection retained.	The lots are land locked, and subject to extreme levels of bushfire risk with unlikely ability to provide safe access for either residents or fire fighters. Updated RFS response: Following further advice from Eurobodalla Council received by RFS on 11 June 2019 that all there is increased density, objection retained.

Column A	Column B	Column C	Column D	Column E	Column F
Area	Zone	Proposed Minimum lot size	Potential increase in lots and dwellings	RFS comment	RFS Identified Constraints and Required Bush Fire Protection Measures
20a. Wamban Road (North), Wamban	RU1	100ha	Nil	No objection – no increased density	No comment
21. Bingie Road, Bingie	RU4	20ha	1 lot and 15 dwellings	No objection– subject to future development satisfying any constraints identified in Column F	Lots with frontage onto Bingie Road or Kelly Road – future dwellings to be within close proximity to Bingie Road/Kelly Road including: - Lot 141//DP856799 (118 BINGIE ROAD, BERGALIA 2537) - Lot 140//DP1047932 (216 BINGIE ROAD, BERGALIA 2537) - Lot 15//DP839455 (216 BINGIE ROAD, BERGALIA 2537) - Lot12//DP804129SHORTADDRESS STRING 274 BINGIE ROAD, BERGALIA 2537 Lots land locked shall provide practical and legal access and 10KW APZs for refuge onsite including: - Lot 169//DP752137 (372 BINGIE ROAD, BERGALIA 2537) - Lot 320//DP752137 (372 BINGIE ROAD, BERGALIA 2537)
22. Prince Hwy (West), Coila and Turlinjah	RU1	20ha	4 lots and 5 dwellings	No objection– subject to future development satisfying any constraints identified in Column F	Future dwellings to be located in close proximity to Coila Creek Road

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
22a. Princes Hwy (East), Coila	RU1	40ha	Nil	No objection – no increased density	No comment
22b. Kyla Park	RU1	100ha	Nil	No objection – no increased density	No comment
22c. Princes Hwy (East), Turinjah	RU1	40ha	1 dwelling	No objection– subject to future development satisfying any constraints identified in Column F	Future dwellings to be located in close proximity to public access road.
23. Potato Point Road (South), Bodalla and Potato Point	RU1	40ha	2 lots and 4 dwellings	South-West Objection – The RFS does not support increased densities in the western portion of Area 23. Updated RFS response: - Lot 101 – No objection - Lot 169 – Objection retained.	South-West The below listed lots are land locked, and subject to extreme levels of bushfire risk with unlikely ability to provide safe access for either residents or fire fighters: - Lot 101//DP752131 (328 POTATO POINT ROAD, BODALLA 2545) - Lot 169//DP752131 (POTATO POINT ROAD, BODALLA 2545) Updated RFS response: Following further advice from Eurobodalla Council received by RFS on 11 June 2019 that lot 101 has an existing dwelling and that lot 169 would be subject to increased density the following comments are provided: - Lot 101 – objection removed, notwithstanding, it is noted that future development in this location

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
					will likely require additional bush fire protection measures to those outlined in the acceptable solution pathway of Planning for Bush Fire Protection • Lot 169 – objection retained
				South-East No objection to lots in the eastern portion subject to future development satisfying any constraints identified in Column F	South-East Lots with frontage onto Potato Point Road, future dwellings to be provided in close proximity to Potato Point Road, provide 10KW PAZs for refuge onsite and BAL 29
24. Princes Hwy, South Bodalla	RU1	100ha	2 lots and 4 dwellings	No objection – subject to future development satisfying any constraints identified in Column F.	Future dwellings to be provided in close proximity to Gannons Point Road.
25. Princes Hwy, North Bodalla & Blackfellows Point Road, Bodalla	RU1	40ha	1 lot and 5 dwellings	North-east Objection – The RFS does not support increased densities in the north eastern portion of Area 25:	North-east Below listed lots are subject to extreme levels of bush fire risk with unlikely ability to provide safe access for either residents or fire fighters: - Lot 125//DP752131

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
25a. Potato Point Road and Horse Island Road, Bodalla	RU1	20ha	6 lots and 10 dwellings	Other No objection— subject to future development satisfying any constraints identified in Column F. West - No objection to the western most portion of area 25a North The RFS does not support increased densities in the north of Area 25a Updated RFS response: • Objection retained.	(BLACKFELLOWS POINT ROAD BODALLA 2545) Other - 3//DP773724 (GANNONS POINT ROAD, BODALLA) provide future dwellings in close proximity to Gannons Point Road and 10KW APZs for onsite refuge. - 17//DP837516 (HORSE ISLAND ROAD, BODALLA 2545) provide future dwellings in close proximity to Potato Point Road and 10KW APZs for onsite refuge. West – no comment North Lots in the northern of Area 25a are subject to extreme levels of bush fire risk with unlikely ability to provide safe access for either residents or fire fighters. Updated RFS response: Following further advice from Eurobodalla Council received by RFS on 11 June 2019 that all there is increased density, objection retained.

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
				Other No objection – subject to future development satisfying any constraints identified in Column F.	Other - Future dwellings to be located in close proximity to Potato Point Road. - Lot 14//DP772053 (326 POTATO POINT ROAD, BODALLA 2545) provide future dwellings in the western portion of the site and in close proximity to Potato Point Road
26. Bumbo Road (East) and Eurobodalla Road, Bodalla	RU1	200ha	Nil	No objection – no increased density	No comment
26a. Bumbo Road (West), Bodalla	RU1	40ha	Nil	No objection – no increased density	No comment
27. North Narooma and Kianga	RU1	40ha	6 lots and 8 dwellings	Objection Lot 7037/1113842, and Lot 207/752162. Updated RFS response: • Lot 207 – No objection. • Lot 7037 – objection retained.	Below listed lots are subject to extreme levels of bush fire risk with unlikely ability to provide safe access for either residents or fire fighters: - Lot 7037/1113842, and Lot 207/752162. Updated RFS response: Following further advice from Eurobodalla Council received by RFS on 11 June 2019 that lot 207 has an existing dwelling entitlement and that lot 7037 would be

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
					subject to increased density the following comments are provided: - Lot 207 – objection removed, notwithstanding, it is noted that future development in this location will likely require additional bush fire protection measures to those outlined in the acceptable solution pathway of Planning for Bush Fire Protection - Lot 7037 – objection retained Other Below listed lots - future dwelling to be co located adjacent to existing approved dwelling in existing large cleared area. - Lot 92//DP752162 (1232 WAGONA SCENIC DRIVE, KIANGA 2546) Below listed lots - no objection based on Council's advised lots already approved to dual occupancy density. - Lot 3//DP838142 (131-179 FRENCHMANS GULLY ROAD, KIANGA 2546) - Lot 2//DP1048232 (DALMENY DRIVE, KIANGA 2546)
28. South Narooma	RU1	20ha	7 lots and 9 dwellings	No objection subject to future development satisfying any constraints identified in Column F	Future development to comply with Planning for Bush fire Protection

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
				identified in Column F	
29. Wagonga Scenic Drive, Narooma and Tebbs Road, Corunna	RU1	40ha	1 lots and 2 dwellings	No objection subject to future development satisfying any constraints identified in Column F	Below listed lots - Legal and practical access to be provided via adjoining lot to the east from Rainforest Parkway and future dwelling to be in the far north east of the site adjacent to small cleared area on lot to the north. Future dwelling to provide 10KW APZs for onsite refuge and BAL 29. - Lot 4//DP794333 (100 HOBBS POINT ROAD, NAROOMA 2546) Below listed lot - Future dwelling within large cleared area of the lot. - Lot 5//DP712045 (566 WAGONGA SCENIC DRIVE, NAROOMA 2546)
30. Wagonga Scenic Drive, Narooma	RU4	5ha	11 lots and 17 dwellings	No objection subject to future development satisfying any constraints identified in Column F	Given increase in density from 0 lots to 17 the provision of a suitable perimeter road to clearly separate the hazard from future residential /rural residential development in this area is required.
30a. Wagonga Scenic Drive,	RU4	2ha	7 lots and 8 dwellings	No objection	No comment

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
Narooma					
30b. Wagonga Scenic Drive, Narooma	RU4	10ha	2 lots and 3 dwellings	No objection	No comment
31. Shingle Hut Road, Narooma	RU1	100ha	1 dwelling	No objection subject to future development satisfying any constraints identified in Column F	Practical and legal access to be provided to lots and future dwellings located in existing cleared areas providing a 10KW APZ for onsite refuge.
32. Central Tilba and Surrounds	RU1	100ha	4 dwellings	No objection subject to future development satisfying any constraints identified in Column F	Future development to comply with Planning for Bush fire Protection.
33. Dignams Creek Road, Dignams Creek	RU1	40ha	6 dwellings	North and East Objection – The RFS does not support increased densities in the north and far east of the Area 33 where lots do not have significant large cleared areas existing. Updated RFS response: • Lots 3, 4 and 6 – No objection • Lot 360 – Objection retained.	North and East Lots are subject to extreme levels of bush fire risk with inadequate access and are therefore unlikely to provide safe access for either residents or fire fighters. Updated RFS response: Following further advice from Eurobodalla Council received by RFS on 11 June 2019 that lots 3, 4 and 6 DP 731495 have existing dwellings and lot 360 DP 752155 is subject to increased densities the following comments are provided: • Lots 3, 4 and 6 DP 731495 –

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
					objection removed, notwithstanding, it is noted that future development in this location will likely require additional bush fire protection measures to those outlined in the acceptable solutions of Planning for Bush Fire Protection Lot 360 DP 752155 – objection retained
				Other No objection subject to future development satisfying any constraints identified in Column F	Other Future dwellings shall provide 10KW APZs for onsite refuges and BAL 29. It is noted that public road access via Dignams Creek road would require suitable load rated bridge crossings to provide safe and practical access to lots east of Dignams Creek Road.
34. Eurobodalla Road, Eurobodalla, Cadgee, Nerrigundah and Tinpot	RU1	100ha	12 dwellings	South and West Objection – The RFS does not support increased densities in the south and west where lots do not have large cleared areas.	South and West Below listed lots are subject to extreme levels of bush fire risk with inadequate access and are therefore unlikely to provide safe access for either residents or fire fighters. - Lot 181//DP720067 (REEDY CREEK ROAD, EUROBODALLA 2545) - Lot 123//DP752145 (610 OLD RED CREEK ROAD, TINPOT 2546)

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
				Updated RFS response: If areas are subject to increased density where sites do not have large existing cleared areas, the objection is retained. If not, the objection is removed.	- Lot 67//DP752145 WATTLEGROVE ROAD, TINPOT 2546 Updated RFS response: Advice was received from Eurobodalla Council received by RFS on 11 June 2019 that lots 181, 123 and 67 6 DP 731495 have existing dwelling entitlements. It is unclear from the documentation provided if other portions of Area 34 are subject to increased density. As such the objection previously provided is retained where applicable or removed if not applicable. Other Practical and legal access to be provided and future dwellings to be located in existing large cleared areas with 10KW APZs for onsite refuge and BAL 29. No comment
35. Belowra	RU1	500ha	Nil	No objection – no increased density	
36. Merricumbene and Deua	RU1	500ha	7 lots and 6 dwellings	Objection – The RFS does not support increased densities in this area. Updated RFS response: Objection retained.	This area is remote from settlement surrounded by National Park and constrained by access and topography and therefore unlikely to provide safe access for either residents or fire fighters. Updated RFS response: No further advice from Eurobodalla Council received regarding this Area. As such the

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
					following comments are provided: • Objection retained.
37a. Araluen Road (North), Deua River Valley	RU1	40ha	1 lot and 1 dwelling	No objection subject to future development satisfying any constraints identified in Column F	Below listed lot - Practical and legal access to be provided to the site via Araluen Road which requires a crossing over the Deua River that shall provide safe access for emergency vehicles and future residents. Below listed lot - Future dwellings to be located in the south eastern portion of the lot with 10KW APZs for onsite refuge and BAL 29. - Lot 84//DP710635 (1857 ARALUEN ROAD, DEUA RIVER VALLEY 2537)
37b. Araluen Road (Central), Deua River Valley	RU1	20ha	3 dwellings	No objection subject to future development satisfying any constraints identified in Column F	Below listed lots - Practical and legal access to be provided to the site via Araluen Road which requires a crossing over the Deua River that shall provide safe access for emergency vehicles and future residents. Below listed lots - Future dwellings to be located in the eastern portion of the lot with 10KW APZs for onsite refuge and BAL 29.

Column A Area	Column B Zone	Column C Proposed Minimum lot size	Column D Potential increase in lots and dwellings	Column E RFS comment	Column F RFS Identified Constraints and Required Bush Fire Protection Measures
					- Lot 151//DP752144 (ARALUEN ROAD, DEUA RIVER VALLEY 2537) - Lot 19//DP752144 (1645 ARALUEN ROAD, DEUA RIVER VALLEY 2537) - Lot 11//DP752144 and Lot 1//DP752144 (ARALUEN ROAD, DEUA RIVER VALLEY 2537)
37c. Araluen Road (South), Wamban and Kiara	RU1	40ha	4 lots and 10 dwellings	No objection subject to future development satisfying any constraints identified in Column F	Below listed lots - Future dwellings shall be accessed via a legal and practical extension of Cherryrise Road and not via Mymossa unless Mymossa Road is upgraded. - Lot 4//DP37552 150 MYMOSSA ROAD, WAMBAN 2537 - Lot 84//DP746274 58 MYMOSSA ROAD, WAMBAN 2537 Below listed lots - Future dwellings shall be located within the existing cleared area of the lots and away from the forested portions. - Lot 2//DP1088633 CHERRYRISE ROAD, WAMBAN 2537 - Lot 11//DP1011309 (77 CHERRYRISE ROAD, WAMBAN 2537)

Column A	Column B	Column C	Column D	Column E	Column F
Area	Zone	Proposed Minimum lot size	Potential increase in lots and dwellings	RFS comment	RFS Identified Constraints and Required Bush Fire Protection Measures
38. Runnyford and Buckenbowra	RU1	500ha	3 dwellings	No objection subject to future development satisfying any constraints identified in Column F	Below listed lot - Future dwelling shall be located within the existing cleared area of the lots and in the north east portion of the site. Future dwellings to be located in the eastern portion of the lot with 10KW APZs for onsite refuge and BAL 29 in recognition that access to/from the site in an emergency is unlikely to be appropriate. - Lot 1//DP221341 (1163 BUCKENBOWRA ROAD, MOGO 2536) Future dwelling shall be located in the north east of the site close to where Runnyford Road first adjoins the site. Future dwelling to provide 10KW APZs for onsite refuge and BAL 29. - Lot 3//DP1170303 (RUNNYFORD ROAD, NELLIGEN 2536)
AREA 39 – South Moruya AREA 40 – Turnbulls Lane,				No objection – no increased density	No comment

Column A	Column B	Column C	Column D	Column E	Column F
Area	Zone	Proposed Minimum lot size	Potential increase in lots and dwellings	RFS comment	RFS Identified Constraints and Required Bush Fire Protection Measures
Moruya					
AREA 41 -- South Nelligen					
AREA 42 -- Hector McWilliam Drive, Tuross Head					

