



# RFS



Department of Planning, Housing & Infrastructure (Parramatta)  
Locked Bag 5022,  
PARRAMATTA NSW 2124  
Australia

Your reference: PP-2023-2300  
Our reference: SPI20240906000173

**ATTENTION:** Jasper Allenby

Date: Friday 11 October 2024

Dear Sir/Madam,

**Strategic Planning Instrument  
Rezoning – Gateway  
Amendment to The Hills Local Environmental Plan 2019**

I refer to your correspondence dated 05/09/2024 inviting the NSW Rural Fire Service (NSW RFS) to comment on the above Strategic Planning document.

The NSW RFS has considered the information submitted and provides the following comments.

Based on the review of the bush fire report prepared by Travers Bushfire and Ecology (dated: 10 May 2019 and ref: 18FCNS02BF), the RFS provides below comments in relation to the proposed amendments to *The Hills Local Environmental Plan 2019*.

**Northern Site:**

- The vegetation bordering the northern site in the west direction cannot be considered remnant hazard due to canopy cover connectivity and insufficient separation from the broader hazard located further west of Cumberland Forest Way. As such, the hazard in the west direction is assessed as forest requiring larger Asset Protection Zone (APZ) on site compared to the APZs identified in the bush fire report.
- Steeper effective slopes are assessed in the west and south directions compared to the slopes identified in the bush fire report, therefore modelling must be updated to reflect this unless justified with a survey plan prepared by a registered surveyor.
- Where hazard is downgraded to remnant formation due to its limited fire runs and area under A1.11.1 of *Planning for Bush Fire Protection (PBP) 2019*, deemed to satisfy (DTS) APZ as per Tables A1.12.2 or A1.12.5 of *PBP 2019* must be used for determining bush fire attack levels. Where modelling is proposed, fuel loads associated with assessed hazard formation must be used. Modelling undertaken in the submitted bush fire report uses rainforest fuel loads for remnant forest hazard (as opposed to forest fuel loads) which is not accepted under *PBP 2019*.

**Southern Site:**

- The vegetation in the east of the subject site cannot be considered remnant hazard due to broader connectivity with the larger hazard in the north direction. As such, the hazard located east of the Bryant Road is assessed as forest requiring larger APZ on site compared to the APZs identified in the bush fire report.

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- Steeper effective slopes are assessed in the North East direction compared to the slopes identified in the bush fire report, therefore modelling must be updated to reflect this unless justified with a survey plan prepared by a registered surveyor.
- Where a combination of hazard is identified, hazard with higher fuel loads must be used in accordance with A1.2 of *PBP 2019*. The submitted bush fire report has identified a combination of North Coast Wet Sclerophyll Forest (WSF) and Northern Hinterland WSF in the North East direction, where modelling using both the hazard formation has been undertaken. As such, in accordance with A1.2 of *PBP 2019*, North Coast WSF must be considered as the predominant hazard and any modelling undertaken must utilise North Coast WSF fuel loads.

Based on the above assessment, it is shown that the subject sites have limited development area which can accommodate BAL 29 footprint. It should also be noted that under the proposed zoning certain special fire protection purpose (SFPP) developments are permissible on the site. However, SFPP developments require larger APZ in accordance with Table 6.8a of *PBP 2019* to achieve 10kW and therefore it is unlikely that SFPP development can be accommodated on the subject sites.

For any queries regarding this correspondence, please contact Surbhi Chhabra on 1300 NSW RFS.

Yours sincerely,

Kalpana Varghese  
**Supervisor Development Assessment & Plan  
Built & Natural Environment**