



RFS



The Hills Shire Council
PO Box 7064
BAULKHAM HILLS BC NSW 2153

Your reference: (REF-3466)
Our reference: SPI20250216000032

ATTENTION: Gideon Tam

Date: Thursday 20 March 2025

Dear Sir/Madam,

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

I refer to your correspondence dated 14/02/2025 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 BlackAsh Bushfire Consulting (dated: 21 November 2024 and ref: J3786, Version 1.0), the RFS provides below comments in relation to the proposed amendments to *The Hills Local Environmental Plan 2019*.

- The proposal relies upon Asset Protection Zones (APZs) as identified in the *Cumberland State Forest Fuel Management Plan (CSFFMP) 2020-2025*, which is identified as an addendum to *The Hills Shire Bush Fire Risk Management Plan 2024* to achieve compliance with Table 5.3a of *Planning for Bush Fire Protection (PBP) 2019*. However, section 2.6 of *PBP 2019* identifies that the Bush Fire Risk Management Plans and similar strategies are designed to address bush fire protection for the community at a local government or regional level and these provisions are not to be considered as Bush Fire Protection Measures (BPMs) for proposed developments. As such, where APZs as identified in the *CSFFMP 2020-2025*, are to be considered to support the proposed rezoning, appropriate information which meets the requirements of section 3.2.5 and/or 3.2.6 of *PBP 2019* must be provided to demonstrate that the offsite APZs will be managed for the life of the development.
- Steeper effective slopes are assessed for the western and southern aspects for the northern site as 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.
- The modelling undertaken in the submitted bush fire report has used a restricted elevation of receiver though no construction of dwelling is proposed as per of the proposal. Therefore, any future modelling proposed for the subject site (for subdivision purposes) must utilise default elevation of receiver.

It should 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*

Postal address

NSW Rural Fire Service
Locked Bag 17
GRANVILLE NSW 2142

Street address

NSW Rural Fire Service
4 Murray Rose Ave
SYDNEY OLYMPIC PARK NSW 2127

T (02) 8741 5555
F (02) 8741 5550
www.rfs.nsw.gov.au



RFS



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**