



RFS



Maitland City Council
PO Box 220
MAITLAND NSW 2320

Your reference: CNR-73930 DA/2024/763
Our reference: DA20240927003999-Original-1

ATTENTION: Emmilia Marshall

Date: Tuesday 12 November 2024

Dear Sir/Madam,

Development Application

s100B – Subdivision – Torrens Title Subdivision

559 Anambah Road Gosforth NSW 2320, 177//DP874171, 55//DP874170

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 04/10/2024.

The NSW RFS cannot support the development in its current form. The documentation submitted with the referral do not provide sufficient detail for a bush fire assessment.

The following information will need to be resubmitted through the Planning Portal under Section 38 of the *Environmental Planning & Assessment Regulation 2021*.

- A preliminary review of the referral identified a number of non-compliances with the access provisions of Table 5.3b of *Planning for Bush Fire Protection (PBP) 2019* with insufficient justification provided regarding the unique features or constraints of the subject site that would prevent or preclude the proposed subdivision from achieving compliance with the acceptable solutions of Table 5.3b in *PBP 2019*. Given that the proposal would result in substantial increase in residential density of the subject site, thereby potentially increasing bush fire risk for the future occupants as well as the fire fighting personnel, adequate justification regarding the following matters must be provided to support any variations to access provisions:
 - Provision of a fire trail in lieu of a perimeter road along the western boundary of the site as shown on the concept master plan required as per Table 5.3b of *PBP 2019*;
 - provision of non compliant non perimeter roads which are proposed with carriageway width of less than the required 5.5 metres in accordance of table 5.3b of *PBP 2019*; and
 - provision of non compliant perimeter roads which are proposed with carriageway width of less than the required 8 metres in accordance of table 5.3b of *PBP 2019*.

Where adequate justification for non compliances cannot be provided based on site characteristics, it is advised that the proposed subdivision layout is revised to incorporate acceptable solutions according to the table 5.3b of *PBP 2019*. It is noted that the report relies upon the provision which allows short constrictions for property access roads to suggest 4 metre wide carriageway widths for the non perimeter roads, however, this is not considered acceptable as the roads under assessment are public roads.

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



- Steeper effective slopes are assessed in the South Western aspect of the site in the 5-10° D/S range as compared to 0-5° D/S identified in the submitted bush fire report. As such, further information such as a survey plan prepared by a registered surveyor shall be provided to support the slopes assessment undertaken in the bush fire report.

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

Yours sincerely,

Adam Small
Manager Planning & Environment Services
Built & Natural Environment



RFS



Maitland City Council
PO Box 220
MAITLAND NSW 2320

Your reference: (CNR-73930) DA/2024/763
Our reference: DA20240927003999-S38-1

ATTENTION: Emilia Marshall

Date: Monday 16 June 2025

Dear Sir/Madam,

Development Application

s100B - Subdivision - Torrens Title Subdivision

559 Anambah Road Gosforth NSW 2320, 177//DP874171, 55//DP874170

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 02/06/2025.

A review of the additional information on non-perimeter roads has identified a number of non-compliances with the access provisions of Table 5.3b of *Planning for Bush Fire Protection (PBP) 2019* with insufficient justification provided regarding the unique features or constraints of the subject site that would prevent or preclude the proposed subdivision from achieving compliance with the acceptable solutions for carriageway width. The proposed subdivision forms part of an urban release area with significant bush fire prone vegetation to the east of the site.

Given that the proposal would result in substantial increase in residential density of the subject site, thereby potentially increasing bush fire risk for the future occupants as well as the firefighting personnel, adequate justification regarding the following matters must be provided to support any variations to access provisions:

- The provision of non-compliant non-perimeter roads, which are proposed with clear carriageway width of less than the required 5.5 metres, must demonstrate compliance with the performance criteria of table 5.3b of *PBP 2019*. The intent of the proposed carriageway width of 5.5 metres for non-perimeter roads is to facilitate safe access of fire fighters to the proposed lots while the residents are evacuating the area simultaneously during a bush fire event, without creating pinch points
- The submitted bush fire report states that the proposed non-perimeter roads are compliant with acceptable solutions of Table 5.3b of *PBP 2019*, however, where assessed against these requirements, it is shown that the proposed non-perimeter roads does not comply with "minimum 5.5m carriageway width kerb to kerb" including other non-compliances.
- A review of the parking design requirements as per *Maitland Development Control Plan (MDCP) 2011* shows that a minimum of 2.6 metres width is required where on street parking is proposed. Where 8 metre wide non-perimeter roads are proposed, a travel lane of only 2.8 metres wide will be available with no parking restriction. Options can be explored to provide parking only on one side of the road to demonstrate compliance with 5.5m wide carriageway requirement as per Table 5.3b of *PBP 2019*.

As mentioned in the correspondence dated 12 November 2024, where adequate justification for non-compliances cannot be provided, based on the site characteristics, the scale of proposed works and the inter

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



relationship of the proposed road network with the remaining stages of the urban release area, it is advised that the proposed subdivision layout be revised to incorporate acceptable solutions according to Table 5.3b of *PBP 2019*.

Steeper effective slopes are assessed beneath the hazard to the east across the Anambah Road for the Transect T2 (east of the proposed lots 321-322 and 401-409) in the 0-5° D/S range as compared to upslope identified in the submitted bush fire report. As such, further information such as a survey plan prepared by a registered surveyor shall be provided to support the slopes assessment undertaken in the bush fire report.

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**



RFS



Maitland City Council
PO Box 220
MAITLAND NSW 2320

Your reference: (CNR-73930) DA/2024/763
Our reference: DA20240927003999-S38-2

ATTENTION: Emilia Marshall

Date: Friday 11 July 2025

Dear Sir/Madam,

Development Application

s100B - Subdivision - Torrens Title Subdivision

559 Anambah Road Gosforth NSW 2320, 177//DP874171, 55//DP874170

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 01/07/2025.

A review of the additional information on non-perimeter roads has identified a number of non-compliances with the access provisions of Table 5.3b of *Planning for Bush Fire Protection (PBP) 2019* with insufficient justification provided regarding the unique features or constraints of the subject site that would prevent or preclude the proposed subdivision from achieving compliance with the acceptable solutions for carriageway width. The proposed subdivision forms part of an urban release area with significant bush fire prone vegetation to the east of the site.

Given that the proposal would result in substantial increase in residential density of the subject site, thereby potentially increasing bush fire risk for the future occupants as well as the firefighting personnel, adequate justification regarding the following matters must be provided to support any variations to access provisions:

- The provision of non-compliant non-perimeter roads, which are proposed with clear carriageway width of less than the required 5.5 metres, must demonstrate compliance with the performance criteria of table 5.3b of *PBP 2019*. The intent of the proposed carriageway width of 5.5 metres for non-perimeter roads is to facilitate safe access of fire fighters to the proposed lots while the residents are evacuating the area simultaneously during a bush fire event, without creating pinch points.
- The submitted bush fire report states that the proposed non-perimeter roads are compliant with acceptable solutions of Table 5.3b of *PBP 2019*, however, where assessed against these requirements, it is shown that the proposed non-perimeter roads does not comply with "minimum 5.5m carriageway width kerb to kerb" including other non-compliances.
- A review of the parking design requirements as per *Maitland Development Control Plan (MDCP) 2011* shows that a minimum of 2.6 metres width is required where on street parking is proposed. Where 8 metre wide non-perimeter roads are proposed, a travel lane of only 2.8 metres wide will be available with no parking restriction. Options can be explored to provide parking only on one side of the road to demonstrate compliance with 5.5m wide carriageway requirement as per Table 5.3b of *PBP 2019*.

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



- The use of locked gates for emergency access is not supported and therefore the design must be amended to include unobstructed access to allow for safe access and egress for firefighting vehicles while residents are evacuating.

As mentioned in the correspondence dated 12 November 2024 and 16 June 2025, where adequate justification for non-compliances cannot be provided, based on the site characteristics, the scale of proposed works and the inter relationship of the proposed road network with the remaining stages of the urban release area, it is advised that the proposed subdivision layout be revised to incorporate acceptable solutions according to Table 5.3b of *PBP 2019*.

Steeper effective slopes are assessed beneath the hazard to the east across the Anambah Road for the Transect T2 (east of the proposed lots 321-322 and 401-409) in the 0-5° D/S range as compared to upslope identified in the submitted bush fire report. As such, further information such as a survey plan prepared by a registered surveyor shall be provided to support the slopes assessment undertaken in the bush fire report.

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**