



# RFS



Sutherland Shire Council  
Locked Bag 17  
SUTHERLAND NSW 1499

Your reference: (CNR-66481) DA24/0086  
Our reference: DA20240307000937-S38-1

**ATTENTION:** Rachel Corry

Date: Tuesday 1 October 2024

Dear Sir/Madam,

**Development Application**

**s100B - SFPP - Hospital, medical centre and health research facilities**

**9-13 Shackel Rd Bangor NSW 2234, 2//DP1047691, 1//DP1047691, 51//DP1170531, 50//DP1170531**

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 06/09/2024.

The proposed development for the construction of a health services facility is classed as a special fire protection purpose (SFPP) development in *Planning for Bush Fire Protection (PBP) 2019*. It is required to demonstrate compliance with the relevant requirements in chapter 6 and the Addendum to *PBP 2019*, through an acceptable or a performance-based solution.

The RFS has reviewed the documentation prepared by Helping Hands Planning & Design P/L dated 06 September 2024. The response does not adequately address the concerns raised in the Request for Further Information issued on 13 May 2024, pertaining to compliance with section 6.2 and Appendix B of the Addendum to *PBP 2019*. The response appears to be preliminary in nature and has relied on a "shelter in place" approach for the proposal which is not supported by the RFS. Additionally, the deviation from the requirements for Class 9 buildings established by Appendix B of the Addendum to *PBP 2019* has not been sufficiently justified.

Further information to substantiate the proposed *conceptual bush fire design and compliance strategy* that demonstrates compliance of the proposal, in its current form, with the performance criteria for SFPP development must be submitted via the Planning Portal pursuant to s38 of the *Environmental Planning and Assessment Regulation 2021* for further assessment.

For any queries regarding this correspondence, please contact Bryce Pascoe on 1300 NSW RFS.

Yours sincerely,

Adam Small  
**Manager Planning & Environment Services**  
**Built & Natural Environment**

**Postal address**

NSW Rural Fire Service  
Locked Bag 17  
GRANVILLE NSW 2142

**Street address**

NSW Rural Fire Service  
4 Murray Rose Ave  
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# RFS



Sutherland Shire Council  
Locked Bag 17  
SUTHERLAND NSW 1499

Your reference: CNR-66481 DA24/0086  
Our reference: DA20240307000937-Original-1

**ATTENTION:** ePlanning Admin

Date: Wednesday 21 August 2024

Dear Sir/Madam,

**Integrated Development Application**

**s100B – SFPP – Hospital, medical centre and health research facilities**

**9-13 Shackel Road Bangor NSW 2234, 1//DP1047691, 2//DP1047691, 50//DP1170531, 51//DP1170531**

I refer to your correspondence dated 19/03/2024 seeking general terms of approval for the above Integrated Development Application.

The New South Wales Rural Fire Service (NSW RFS) cannot support the proposed development. Previously requested information was not received within the legislative timeframe to allow for assessment of the application against the Aims and Objectives of *Planning for Bush Fire Protection (2019)*.

For any queries regarding this correspondence, please contact Bryce Pascoe on 1300 NSW RFS.

Yours sincerely,

Adam Small

**Manager Planning & Environment Services  
Built & Natural Environment**

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SUTHERLAND NSW 1499

Your reference: CNR-66481 DA24/0086  
Our reference: DA20240307000937-Original-1

**ATTENTION:** ePlanning Admin

Date: Monday 13 May 2024

Dear Sir/Madam,

**Integrated Development Application**

**s100B - SFPP - Hospital, medical centre and health research facilities**

**9-13 Shackel Road Bangor NSW 2234, 1//DP1047691, 2//DP1047691, 50//DP1170531, 51//DP1170531**

I refer to your correspondence dated 19/03/2024 seeking general terms of approval for the above Integrated Development Application.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the information provided and advises the following:

The proposed performance solution (including a "shelter in place" plan in event of a bush fire) is not considered to adequately demonstrate compliance with the specific objectives for development of this type established by 6.2 of *Planning for Bush Fire Protection 2019*. Further information is required to demonstrate the proposal's compliance with the specific objectives to:

- minimise levels of radiant heat, localised smoke and ember attack through increased APZ, building design and siting;
- provide an appropriate operational environment for emergency service personnel during firefighting and emergency management;
- ensure the capacity of existing infrastructure (such as roads and utilities) can accommodate the increase in demand during emergencies as a result of the development, and;
- ensure emergency evacuation procedures and management which provides for the special characteristics and needs of occupants.

The proposal in its current form does not conform to the specifications, or justify any deviations from, the requirements of *Planning for Bush Fire Protection 2019*. The RFS requests the consultant to review their assessment and re-lodge it through Council for further consideration.

Furthermore, the subject application does not demonstrate compliance with the standards established by Appendix B to the *Addendum to Planning for Bush Fire Protection 2019*. Any development application associated with schools, child care centres, hospitals and residential care buildings lodged with a Consent Authority after 1 May 2023 is required to comply with the requirements of *PBP 2019* and Appendix B of the *Addendum to PBP*.

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Consideration should be given to the Acceptable Solutions and/or Performance Solutions that may be necessary for compliance with Appendix B of the *Addendum to PBP*. Note that the provisions of *Addendum to PBP* are consistent with the following provisions of Specification 43 of Volume One of NCC 2022:

- S43C10 Building envelope
- S43C11 Supply of water for fire-fighting purposes
- S43C14 Vehicular access

Any variation proposal will need to demonstrate that vehicular access is provided in accordance with Table 6.8b of *Planning for Bush Fire Protection 2019*.

If additional information is not received within 100 days the application will be refused on the basis of Requested Information not provided. A formal request for re-assessment would be required after this time.

For any queries regarding this correspondence, please contact Bryce Pascoe on 1300 NSW RFS.

Yours sincerely,

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