



## NSW RURAL FIRE SERVICE

Shoalhaven City Council  
PO Box 42  
NOWRA NSW 2541

Your reference: PP028  
Our reference: SPI20211117000198

**ATTENTION:** Rebecca Jardim

Date: Monday 7 February 2022

Dear Sir/Madam,

### Strategic Planning Instrument

#### LEP Amendment – Planning Proposal

**Planning Proposal (PP028) to amend Shoalhaven Local Environmental Plan (LEP) 2014 to rezone land owned by the Halloran Trust in the Callala Bay, Wollumboola and Kinghorne localities. PP028 seeks to rezone land to the west of Callala Bay to enable residential development and to rezone the balance to environmental conservation.**

I refer to your correspondence dated 16/11/2021 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.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the proposal with regard to Section 4.4 of the directions issued in accordance with Section 9.1 of the *Environmental Planning and Assessment Act 1979*.

The objectives of the direction are:

- (a) to protect life, property and the environment from bush fire hazards, by discouraging the establishment of incompatible land uses in bush fire prone areas, and
- (b) to encourage sound management of bush fire prone areas.

The direction provides that a planning proposal must:

- (a) have regard to *Planning for Bushfire Protection 2006*,
- (b) introduce controls that avoid placing inappropriate developments in hazardous areas, and
- (c) ensure that bushfire hazard reduction is not prohibited within the APZ.

Based upon an assessment of the information provided, the NSW RFS is not currently satisfied that the proposal is consistent with the directions.

The Strategic Bush Fire Study (SBFS) identifies bush fire constraints largely surrounding the area with forested vegetation to the north, south and west. Callala Bay is considered a high risk isolated location with potential paths of travel to Princes Highway involving traversing approximately 15km of heavily forested areas. In the event

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of an evacuation of the planning proposal site the only safe path of travel is eastward into the existing village. The statements within part 7 of the SBFS prepared for the planning proposal do not adequately address evacuation of the future residents within the planning proposal area. The strategic planning stage of development is the appropriate time to assess these issues.

The following issues are identified:

- All evacuation traffic will be eastward along Emmet Street
- Emmet Street is the only east - west road through the village and congestion issues are already apparent without the additional traffic generation
- Emmet Street, along the southern interface of the planning proposal area, is impacted by forested vegetation
- It is unclear where within the existing village evacuating residents would take refuge. Existing public building and places Callala Bay are sited on the southern side of the village with potential impact from bush fire within the southern hazard area.
- Further information should be provided to demonstrate the two roads on either side of proposed C3 zoned land will not directly adjoin retained forested vegetation.

The proponent and SFBS should provide further information to support the proposal through considering mitigative measures and densities that are reflective of the risks associated with the site. Such measures should be guided by an assessment of:

- the proposed and existing road network to deal with evacuating residents and responding emergency services;
- the location of key access routes and direction of travel
- the potential for the development to be isolated in the event of a bush fire.
- an assessment of any existing or potential community refuge buildings and/or areas both within the planning proposal site and within the existing village.
- consideration should be given to additional eastward egress from the pp site into the existing village area.

NSW RFS is of the opinion that the proposal should not progress to exhibition stage prior to resolution of the issues above.

#### Road interface entry options - advice requested by Council

Council have requested specific comments from NSW RFS in relation to the screening options along Callala Beach Road.

At this very preliminary stage, it appears that the potential flame length applied to predominant vegetation west of Callala Beach Road will exceed the distance to the proposed vegetated screen, therefore any asset protection zone should be measured from the vegetation screen and not from the western side of Callala Beach Road. Please note a short fire run and/or remnant bushland assessment applied in isolation to the vegetated screen, in accordance with A1.11 of *Planning for Bush Fire Protection 2019*, is unlikely to be supported.

For any queries regarding this correspondence, please contact Anna Jones on 1300 NSW RFS.

Yours sincerely,

Martha Dotter  
**Supervisor Development Assessment & Plan  
Built & Natural Environment**