



The Secretary  
Department of Planning, Industry & Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Your Ref: MP 05\_0198 MOD 4  
Our Ref: DA-2006-04539

**ATTENTION:** Emma Butcher

17 July 2020

Dear Ms Butcher,

## **MP 05\_0198 (Mod 4) – Bilambil Heights Residential Subdivision**

I refer to your correspondence dated 24 June 2020 seeking comments from the NSW Rural Fire Service (RFS) with respect to the above modification application and the Applicant's response to submissions.

The NSW RFS understands the proposed modification seeks to amend Condition B24 and Condition E7 regarding bush fire protection for the proposed development, as follows:

### **B24 Asset Protection Zones**

- 1) Asset Protection Zones (APZs) in each stage are to be provided in accordance with the Ecological Bushfire Planning Assessment in the Biolink Ecological Consultants report dated June 2011, as contained within the Environmental Management Area, illustrated on the proposed subdivision plans in condition A3. Details of the APZs are to be provided, accompanied by a Fire Protection Association Australia Accredited Bushfire Planning and Design (BPAD) Certified Practitioner endorsement, to the satisfaction of the Certifying Authority prior to the release of the Construction Certificate for each stage.
- 2) Asset Protection Zones in each Stage are to be provided on private land, in accordance with Planning for Bushfire Protection (2006). Details and a plan showing the APZs, accompanied by a Fire Protection Association Australia Accredited Bushfire Planning and Design (BPAD) Certified Practitioner endorsement, are to be provided to the satisfaction of the Certifying Authority prior to the release of the Construction Certificate for each Stage.
- 3) Thinning of Camphor Laurel trees within the APZ for Lots 38, 39, 40, 55, 57, 59, 60 and 61 is required in order to comply with Planning for Bushfire Protection 2006 as part of the on-going maintenance of adequate bushfire protection.

#### **Postal address**

Records  
NSW Rural Fire Service  
Locked Bag 17  
GRANVILLE NSW 2142

#### **Street address**

NSW Rural Fire Service  
Planning and Environment Services (North)  
Suite 1, 129 West High Street  
COFFS HARBOUR NSW 2450

**T** (02) 6691 0400  
**F** (02) 6691 0499  
[www.rfs.nsw.gov.au](http://www.rfs.nsw.gov.au)  
**Email:** [pes@rfs.nsw.gov.au](mailto:pes@rfs.nsw.gov.au)



### **E7 Asset Protection Zones (APZ)**

1) Prior to the issue of the Subdivision Certificate for the relevant Stage, certification from a Fire Protection Association Australia (FPA Australia) accredited Bushfire Planning And Design (BPAD) certified practitioner, must be submitted to the PCA, confirming that the subject development complies with the original Biolink Ecological and Bushfire Planning Assessment – Final Report dated June 2011 and Asset Protection Zone Bushfire Fuel Management Plan prepared by Bushfire Certifiers dated 16 June 2020.

2) No dwellings shall be constructed within the APZ. Private open space, communal open space, roads, backyards and pools are permissible in the APZ.

3) Thinning of Camphor Laurel trees within the APZ for Lots 38, 39, 40, 55, 57, 59, 60 and 61 is required in order to comply with *Planning for Bushfire Protection 2006* as part of the ongoing maintenance of adequate bushfire protection.

With regard to proposed Condition B24, the NSW RFS raises no objection to the proposed modification to enable endorsement of certain matters by a suitably qualified bush fire consultant.

With regard to proposed Condition E7(1), the referenced documents, being the original Biolink Ecological and Bushfire Planning Assessment – Final Report dated June 2011 and Asset Protection Zone Bushfire Fuel Management Plan prepared by Bushfire Certifiers dated 16 June 2020, do not address all the matters included in the recommended conditions provided by the NSW RFS on 24 September 2009. In this regard, it is recommended that the following matters also be included:

- From the issue of subdivision certificate, the entire area of Lots 1-37, 41-60, 62-78 and C1-C5 should be managed as an asset protection zone, as outlined in the Bushfire Fuel Management Plan (Bushfire Certifiers, 16 June 2020).
- Lots 38, 39, 40, 61 and C6 should be managed as an asset protection zone, as outlined in the Bushfire Fuel Management Plan (Bushfire Certifiers, 16 June 2020) for those parts of the respective lots identified as environmental management area / asset protection zone and around the building envelope.
- The restriction-to-use over Lot 6 DP 1117326 should include that part of Lot 6 identified as the environmental management area and the land between the environmental management area and Lot 54.
- The reference to AS 2419.1 - 1994 in the Biolink Ecological and Bushfire Planning Assessment – Final Report dated June 2011 is out of date. Fire hydrant spacing, sizing and pressure should comply with AS 2419.1 – 2005.

For any queries regarding this correspondence please contact Paul Creenaune on 1300 NSW RFS.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alan Bawden', with a stylized 'A' and 'B'.

Alan Bawden

**Team Leader – Development Assessment & Planning  
Planning and Environment Services - North**

*The RFS has made getting information easier. For general information on 'Planning for Bush Fire Protection, 2006', visit the RFS web page at [www.rfs.nsw.gov.au](http://www.rfs.nsw.gov.au) and search under 'Planning for Bush Fire Protection, 2006'.*