



# RFS



Department of Planning, Housing and Infrastructure (Major Projects)

Locked Bag 5022  
Parramatta NSW 2124

Your reference: SSD-69257218

Our reference: DA20250307000856-EIS & DA Exhibition-1

**ATTENTION:** Michelle Niles

Date: Wednesday 16 April 2025

Dear Sir/Madam,

**State Significant Development -  
Request for comments - exhibited Environmental Impact Statement (EIS)  
Mixed Use Development - 25 MOSS VALE RD BOMADERRY NSW 2541, 110//DP131219**

Reference is made to correspondence dated 06/03/2025 seeking comments regarding the Environmental Impact Statement (EIS) currently being exhibited, for the above State Significant Development in accordance with the *Environmental Planning and Assessment Act 1979*.

The New South Wales Rural Fire Service (NSW RFS) has reviewed the EIS and provides the following comments;

The NSW RFS has reviewed the EIS published on the Major Projects portal, in particular the chapters dealing with hazards and bush fire risk and the following appendices:

- The bush fire hazard assessment prepared by Ecological dated 1 November 2024
- Architectural plans and masterplan diagrams

**Bush Fire Risk**

The NSW RFS considers that the recommendations and conclusion of the bush fire report are not currently adequate to recommend for conditions of consent.

DPHI should require the proponent to submit a revised bush fire assessment report that provides the following additional information:

**Asset Protection Zones and BALs**

The following clarification is required in relation to the proposed asset protection zones (APZ):

- APZ west of proposed Lots F1 and D1 is inconsistent with that previously assessed under approved DA SF10851:
  - The proposed APZ now extends into the public reserve rather than stopping at the edge of the road pavement as previously required. Clarification is required as to the mechanism that will ensure the ongoing management of the APZ within the public reserve, its consistency with any current or future Vegetation Management Plan and with the BDAR waiver issued by DPHI dated 23/8/2024.

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- Clarification to whether APZ can be assumed over the full width of the road reserve. Previously APZ was required to stop at the edge of the constructed road pavement.
- APZ south of Lot A has been proposed in accordance with Method 2 bush fire attack modelling. The following inputs require review:
  - Elevation of Receiver should be increased to the height of the most vulnerable element of the building as depicted on the south elevation of the Site A building plan.
  - 1 metre contour data shows effective slope beneath transect 3 appears to be greater than 1° downslope.
  - Clarification to whether APZ can be assumed over the full width of the road reserve. Previously APZ was required to stop at the edge of the constructed road pavement.

The Bush Fire Attack levels in Appendix A and APZ distances in Figure 5 of the bush fire assessment report cannot be verified until the matters above are resolved.

### Access

Several performance measures to acceptable solutions for access are proposed to address Planning for Bush Fire Protection. The NSW RFS provide the following comments:

- The NSW RFS require the roads to be sufficient to carry a fully loaded firefighting vehicle up to 23 tonnes. An assumption that it is unlikely a fire appliance larger than a Category 1 tanker will attend the site is not supported.
- Where turning areas do not comply with A3.3 of Planning for Bush Fire Protection 2019, the NSW RFS require swept paths to demonstrate the vehicle can manoeuvre wholly within the pavement and include an additional 500mm clearance either side of the vehicle in accordance with Figure A3.2a. Please confirm the swept path in Figure 7 includes the additional clearances required. Additionally the use of the carpark entry for vehicle manoeuvring is not suitable due to the height limitation at the carpark entry. A vertical clearance of 4 metres is required.

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

Yours sincerely,

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