



# RFS



Department of Planning, Housing and Infrastructure (Major Projects)  
Locked Bag 5022  
Parramatta NSW 2124

Your reference: SSD-70748466  
Our reference: DA20250726002963-Response to Submissions-1

**ATTENTION:** Renah Givney

Date: Thursday 11 September 2025

Dear Sir/Madam,

## Development Application

**State Significant Development – Response to Submissions – Residential Subdivision/Masterplan  
Response to Submissions - Huntlee New Town - Stage 2 (SSD-70748466), (none)**

I refer to your correspondence regarding the above proposal which was received by the NSW Rural Fire Service on 25/07/2025.

Based upon an assessment of the information provided, the NSW RFS raises no objections to the proposal subject to a requirement that the future subdivision and development of the land complies with *Planning for Bush Fire Protection (PBP) 2019*.

A high-level bush fire risk assessment of the concept areas has been completed to verify compliance with *PBP 2019*.

A detailed bush fire risk assessment of the proposed development of Huntlee New Town Stage 2, (part of) Village 2, has been undertaken, as requested. Stage 2 site is generally suitable for residential subdivision with the proposed lots demonstrating compliance with *PBP 2019*.

The revised slope and vegetation assessment provided by MJD Environmental has been reviewed and the corresponding APZs are supported. However, some of the proposed lots rely on asset protection zones (APZs) proposed offsite to achieve compliance with the radiant heat threshold of 29kW/m<sup>2</sup> or less, which will require further action to ensure ongoing management of these APZs to an inner protection area (IPA) standard in accordance with Appendix 4 of *PBP 2019*.

The recommendations of the bush fire report prepared by MJD Environmental (Final V.6 / June 2024) are supported. In addition to those recommendations, the following issues should be addressed prior to approval of the subdivision of Huntlee New Town Stage 2:

1. As the plans provided indicate that the APZs will be provided predominantly outside of the proposed residential lots within Stage 2 the following items are required to be noted and addressed:

i. the entire area of an APZ is required to be maintained to the standard of an inner protection area (IPA) in accordance with Appendix 4 of *PBP 2019*.

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ii. the bush fire report has not addressed the proposed APZs in relation to Sections 3.2.5 and 3.2.6 of *PBP 2019*.

- The proposal includes the provision of APZs within some residential lots in Village 2. Section 88 instruments will need to be created in accordance with the *Conveyancing Act 1919* for the ongoing maintenance of APZs and the prevention of construction of habitable spaces of dwellings within these APZs.
- The proposal includes the provision of APZs on public land which is to be handed over to Council. The APZs proposed on public land must be established and maintained under a suitable planning instrument to comply with section 3.2.6 of *PBP 2019*.

2. The landscape plans identify a number of drainage basins throughout the development site. Unless the drainage or bio basins are proposed to be managed as an IPA under a formal vegetation management plan in perpetuity, the vegetation in these basins needs to be assessed as part of the hazard in accordance with Appendix 1 of *PBP 2019* to provide appropriate setbacks based on the proposed vegetation class.

3. A bush fire attack level (BAL) Table must be prepared with regard to the comments above, with a BAL Plan identifying the lot numbers and BAL ratings applicable to future dwellings on lots within the subdivision of Village 2. The BAL Plan provided in Figures 20 to 25 in the bush fire report prepared by MJD Environmental (dated 11/06/2025, V.4, referenced Z:\16015 - Huntlee, Branxton) cannot be relied upon for future development as there is insufficient information provided in relation to establishment of APZs offsite and vegetation management of drainage basins.

For any queries regarding this correspondence, please contact Elaine Chandler on 1300 NSW RFS.

Yours sincerely,

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