



## NSW RURAL FIRE SERVICE

Department of Planning and Environment (Sydney Offices)  
GPO Box 39  
Sydney NSW 2001

Your reference: SSD 8859  
Our reference: DA-2019-00324-Response to  
Submissions-1

**ATTENTION:** Tom Bertwistle

Date: Wednesday 8 September 2021

Dear Sir/Madam,

**State Significant Development – Highway Service Centre  
Request for comments – exhibited Environmental Impact Statement (EIS)  
1111 ELIZABETH DR CECIL PARK NSW 2178, 2/4/DP2954**

Reference is made to correspondence dated 22/10/2020 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;

1. Prior to the issue of subdivision certificate, a restriction on the use of land must be created under section 88B of the *Conveyancing Act 1919* in the following manner on proposed lots 6 to 12 (as denoted in the 'Subdivision Plan' prepared by AE Design Partnership Pty Ltd, dwg no. DA05, issue AI, dated 14/08/2020):

- For the entirety of lots 6 to 12, to prohibit 'hazardous industries' (including service stations) as defined under section 8.3.9 of *Planning for Bush Fire Protection 2019*, 'special fire protection purposes' as defined under section 100B(6) the Rural Fires Act 1997, and other Class 9 buildings (with a floor space area great than 500m<sup>2</sup>) per section 8.3.11 of *Planning for Bush Fire Protection 2019*; and
- To prohibit the construction of buildings (other than class 10b structures) within 20 metres of the north-eastern boundary of lots 10 to 12; and
- To prohibit the construction of buildings (other than class 10b structures) within 16 metres of the south-eastern boundary of lots 6 to 10.

The consent authority is to be nominated as the authority having the power to release, vary or modify the restriction.

2. Prior to the issue of subdivision certificate, the widening and realignment of Elizabeth Drive and Wallgrove Road to which the proposed development relies upon for the purposes of an Asset Protection Zone (APZ), must be constructed to the extent as depicted on the 'structure plan' prepared by AE Design Partnership Pty Ltd, dwg no. DA06, issue AI, dated 14/08/2020.

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3. Prior to the issue of subdivision certificate, a Plan of Management (to be managed by a public authority per section 3.2.6 of *Planning for Bush Fire Protection 2019*) or Community Title scheme must be established requiring the 'On Site Detention Lot' to be entirely managed to the standards of an inner protection area (IPA) as outlined in Appendix 4 of *Planning for Bush Fire Protection 2019*.

4. Except for the areas denoted 'Grassy and Semi-Arid Woodlands' as depicted in Figure 5 of the bush fire report prepared by GHD, ref. 2127092, dated 17 August 2021, the entire development site and the road reserves must be entirely managed in perpetuity to the standards of an inner protection area (IPA) as outlined in Appendix 4 of *Planning for Bush Fire Protection 2019*.

5. Landscaping within inner protection areas (IPAs) must comply with Appendix 4 of *Planning for Bush Fire Protection 2019*. In this regard, the following principles are to be incorporated:

- A minimum 1 metre wide area, suitable for pedestrian traffic, must be provided around the immediate curtilage of the building;
- Planting is limited in the immediate vicinity of the building;
- Planting does not provide a continuous canopy to the building (i.e. trees or shrubs are isolated or located in small clusters);
- Landscape species are chosen to ensure tree canopy cover is less than 15% (IPA) at maturity and trees do not touch or overhang buildings;
- Avoid species with rough fibrous bark, or which retain/shed bark in long strips or retain dead material in their canopies;
- Use smooth bark species of trees which generally do not spread fire up the bark into the crown;
- Avoid planting of deciduous species that may increase fuel at surface/ ground level (i.e. leaf litter);
- Avoid climbing species to walls and pergolas;
- Locate combustible materials such as woodchips/mulch, flammable fuel stores away from the building;
- Locate combustible structures such as garden sheds, pergolas and materials such as timber garden furniture away from the building; and
- Low flammability vegetation species are used.

6. Any new Class 10b structures as defined per the *National Construction Code* must be non-combustible.

7. The proposed street must comply with the following requirements for non-perimeter roads under Table 5.3b of *Planning for Bush Fire Protection 2019*:

- traffic management devices are constructed to not prohibit access by emergency services vehicles;
- maximum grades for sealed roads do not exceed 15 degrees and an average grade of not more than 10 degrees or other gradient specified by road design standards, whichever is the lesser gradient;
- dead end roads incorporate a minimum 12 metres outer radius turning circle, and are clearly sign posted as a dead end;
- the capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes); bridges/causeways are to clearly indicate load rating.
- hydrants are located outside of parking reserves and road carriageways to ensure accessibility to reticulated water for fire suppression;
- hydrants are provided in accordance with the relevant clauses of AS 2419.1:2005 - Fire hydrant installations System design, installation and commissioning;
- minimum 5.5m carriageway width kerb to kerb;
- parking is provided outside of the carriageway width;
- hydrants are located clear of parking areas;
- curves of roads have a minimum inner radius of 6m;
- the road crossfall does not exceed 3 degrees; and
- a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches, is provided.

8. To ease property defence operations and allow for more efficient use of firefighting resources under section 3.4.1 of *Planning for Bush Fire Protection 2019*, the development must facilitate fire trucks to move about

between lots along the bush fire interface without exiting onto the street to access an adjoining lot. Prior to the issue of subdivision certificate, an easement allowing unobstructed emergency vehicle access between properties must be created along the bush fire interface of proposed lots 6 to 11 under section 88B of the *Conveyancing Act 1919*. The easement must comply with the minimum specification for property access roads as outlined in Table 7.4a of *Planning for Bush Fire Protection 2019*. If vehicular access cannot be constructed or established over the Gas Pipe Easement, the emergency vehicle access easement can be adjacent to the Gas Pipe Easement. In this regard, the proposed earthworks must ensure that the finished ground levels and grading facilitate proper vehicular connectivity between the affected lots along the emergency vehicle access easement.

9. The provision of water, electricity and gas must comply with Table 5.3c of *Planning for Bush Fire Protection 2019*.

This letter is in response to additional information submitted and supersedes our previous correspondence dated 4 February 2019.

For any queries regarding this correspondence, please contact Simon Derevnin on 1300 NSW RFS.

Yours sincerely,

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