



## NSW RURAL FIRE SERVICE

Shoalhaven City Council  
PO Box 42  
NOWRA NSW 2541

Your reference: (REF-201) PP005  
Our reference: SPI20210516000068

**ATTENTION:** Eric Hollinger

Date: Thursday 15 July 2021

Dear Sir/Madam,

### Strategic Planning Instrument

#### Rezoning – Gateway

PP005 seeks to resolve the long term development potential of land within the 'Crams Road Urban Investigation Area' identified in the Nowra Bomaderry Structure Plan that was 'deferred' from Shoalhaven Local Environmental Plan (LEP) 2014. As a result, the land is still currently zoned Rural 1(d) (General Rural) under Shoalhaven LEP 1985. The land is proposed to be rezoned to a mix of E2 - Environmental Conservation, RU2 - Rural Landscape R5 - Large Lot Residential, and R2 - Low Density Residential.

I refer to your correspondence dated 11/05/2021 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 NNSW RFS has reviewed the proposal with regard to Section 4.4 of the directions issued in accordance with Section 9.1(2) 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 2019*,
- (b) introduce controls that avoid placing inappropriate developments in hazardous areas, and
- (c) ensure that bushfire hazard reduction is not prohibited within the APZ.

With regard to these requirements, the subject site incorporates significant access and ecological constraints. The information provided to support the Proposal has not adequately addressed the strategic bush fire planning principles and bush fire study requirements detailed in section 4 of *Planning for Bushfire Protection 2019 (PBP)*.

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The concept plans and preliminary bush fire assessment detail a significant departure from the specifications and requirements for residential development outlined in PBP 2019. While the parameters of the report could not be verified, the substantial reliance on performance-based solutions to demonstrate compliance with PBP 2019 at this stage of land use planning, is not considered appropriate.

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

For any queries regarding this correspondence, please contact Bradley Bourke on 1300 NSW RFS.

Yours sincerely,

Anna Jones

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