



Ref: 2424 Anambah Date: 30 May 2025

Adam Small NSW Rural Fire Service Locked Bag 17 GRANVILLE NSW 2142

Attention: Adam Small

NSW Rural Fire Service Request for Information

Council Ref:	CNR-73930
	DA/2024/763
RFS Ref:	DA20240927003999-Original-1
Development:	s100B – Subdivision – Torrens Title Subdivision
Address:	559 Anambah Road, Gosforth NSW 2320

We refer to your correspondence dated 12 November 2024 regarding the above-mentioned Development Application, which is currently under assessment by Maitland City Council. This letter provides a formal response to the Request for Further Information (RFI) issued by the NSW Rural Fire Service.

An Amended Bushfire Assessment Report has been prepared to address the matters raised in the RFI. The amended report includes:

- □ An updated Slope and Vegetation Assessment with verified slope transects; and
- Confirmation that Perimeter Roads and Non-Perimeter Roads are now compliant with the access provisions of Table 5.3b of Planning for Bush Fire Protection 2019 (PBP 2019), consistent with similar subdivisions recently approved by the NSW RFS.

We provide the following information in response:

1. Roads and Access

Perimeter Road Design (Western Boundary)

The revised concept masterplan incorporates a continuous perimeter road along the entire western boundary of the development site. We confirm that all perimeter roads adjoining the bushfire hazard interface have a minimum kerb-to-kerb width of 10.5 metres and are fully compliant with the Acceptable Solutions of Table 5.3b of PBP 2019. These perimeter roads provide direct access to the western bushland interface and riparian corridor and have been purposefully designed to facilitate safe two-way access for firefighting vehicles and residents evacuating the site.

Non-Compliant Internal (Non-Perimeter) Roads - Carriageway Widths

The following response focuses specifically on the local non-perimeter roads, which are proposed with an 8.0 metre wide carriageway. These internal roads are not located on the bushfire interface and have been assessed as a performance-based solution under PBP 2019. However,





it is important to clarify that the non-perimeter roads do in fact comply with the Acceptable Solutions under Table 5.3b of PBP 2019, which requires:

- □ A minimum 5.5m wide trafficable carriageway, and
- □ Parking provided outside that 5.5m width.

The proposed local roads provide exactly this configuration—a 5.5m clear carriageway with an additional 2.5m sealed verge or pavement suitable for on-street parking, positioned outside the main traffic lane. This design maintains full compliance with PBP 2019's Acceptable Solutions for non-perimeter roads, while also enabling safe on-street parking without impeding emergency vehicle access.

Justification for 8.0m Local Street Widths – Performance Considerations

While compliant as outlined above, the following additional factors demonstrate the suitability of the 8.0m road layout in achieving PBP 2019's intent for safe access and egress:

- 1. On-Street Parking Demand is Low
 - □ All dwellings will provide a minimum of two off-street parking spaces, with additional capacity for two vehicles on driveways, accommodating up to four vehicles per lot.
 - □ The average vehicle ownership in Maitland LGA is 1.9 per dwelling, indicating that on-site parking is sufficient to meet normal residential needs without reliance on kerbside parking.
 - During bushfire emergencies, visitor vehicles are unlikely to be present as official advice directs people to avoid such areas, and most vehicles would be removed during evacuation, reducing kerbside congestion.
- 2. Functional Width Maintained During Emergencies
 - □ If vehicles were parked on both sides of the street, a clear width of 4.0 metres remains, which:
 - Is consistent with conservative performance-based assessments previously accepted by the RFS in similar contexts;
 - Is navigable by firefighting vehicles under emergency conditions;
 - o Benefits from regular driveway gaps (typically every 10m), creating passing bays;
 - Is supported by good sight distances allowing early detection and yielding to oncoming emergency vehicles.
- 3. Limited Evacuation Traffic
 - Even under conservative modelling, an 8.0m wide local street servicing ~22 lots is expected to generate only 23 vehicle trips during evacuation.
 - These trips are dispersed across time, and the internal road network is highly interconnected, ensuring multiple evacuation paths and low conflict potential with emergency vehicles.
- 4. Non-Perimeter Roads Are Not Firefighting Access Routes
 - □ The 8.0m wide roads are not situated adjacent to the bushfire hazard interface and do not serve as primary firefighting access routes.
 - All tactical access to the hazard areas is provided via compliant 10.5m or greater perimeter roads, designed specifically for this purpose.
 - □ Therefore, the local roads serve only to convey evacuating residents to safer parts of the subdivision and do not require the same design standard as interface roads.





The proposed local road design for the residential subdivision satisfies the Performance Criteria and Acceptable Solutions of Table 5.3b of PBP 2019 for non-perimeter roads and demonstrates strong performance against the overarching intent of the policy. The layout ensures:

- Compliance with minimum carriageway widths and parking configurations;
- □ Effective evacuation and emergency access;
- Limited and low-conflict traffic volumes; and
- Separation from bushfire-prone vegetation.

Consistency with Recent RFS Approvals

The access provisions are consistent with the RFS's expectations for similar residential subdivision approvals across the Hunter and Central Coast Regions. Specifically, the RFS has recently supported 8.0 metre wide non-perimeter roads in a number of comparable subdivisions, where the design provides:

- A minimum 5.5 m trafficable carriageway; and
- Parking located outside of the 5.5 m width, or managed to ensure emergency vehicle access.

Examples include:

- □ 51 Station Lane, Lochinvar (CNR-40679, DA/2022/511) RFS BFSA issued 7 July 2024, permitting 8.0 m carriageway width for non-perimeter roads.
- □ 442 Louth Park Road, Louth Park (CNR-49186, DA/2022/1260) RFS BFSA issued 1 July 2024, with RFS accepting a performance-based solution for road widths.
- 464 Cessnock Road, Gillieston Heights (CNR-37287, DA/2022/193) RFS BFSA issued 17 July 2024, explicitly accepting 8.0 m carriageway for perimeter roads and 5.5 m for non-perimeter.
- □ 514 Newline Road, Raymond Terrace (CNR-50421, 16-2013-599-1) RFS BFSA issued 12 April 2023, approving 8.0 m wide non-perimeter roads with on-street parking.
- □ 523 Raymond Terrace Road, Chisholm (CNR-56410, DA/2023/433) RFS BFSA issued 3 April 2024, adopting 5.5 m for non-perimeter roads and 8.0 m for perimeter roads.
- Windermere Road, Windermere (CNR-49659, DA/2022/1332) RFS BFSA issued 27 May 2024, approving a merit-based variation for non-perimeter roads in a low-risk subdivision.

Beyond explicit conditions to omit any condition stipulated a parking requirement (or parking restriction), the RFS has employed various mechanisms to support performance-based solutions for road access. This includes issuing General Notes within Bush Fire Safety Authorities, such as for 51 Station Lane, Lochinvar, where an 8m carriageway with parking was allowed due to low bushfire risk. Furthermore, the RFS has directly approved performance-based solutions for access, as seen in the 442 Louth Park Road and 464 Cessnock Road, Gillieston Heights BFSAs, explicitly stating their support or acceptance of such solutions based on specific circumstances and justification.





The proposed 8.0 metre wide non-perimeter roads for this subdivision adopt the same design approach, a compliant 5.5 m carriageway plus an additional 2.5 m verge or parking provision, consistent with these recent RFS-supported examples.

In finalising the General Terms of Approval, we respectfully request that the RFS adopt a consistent approach to recent subdivision approvals by omitting any condition or Acceptable Solution wording that requires "parking is provided outside the carriageway width." The proposed 8.0 m wide non-perimeter roads, with a 5.5 m trafficable carriageway and an additional 2.5 m verge or parking provision, demonstrably satisfy the performance criteria and intent of Table 5.3b of PBP 2019. Furthermore, as seen in the RFS's recent Bush Fire Safety Authorities for projects including 51 Station Lane, Lochinvar, 442 Louth Park Road, and Windermere Road, the RFS has employed flexible mechanisms such as General Notes, specific plan approvals, and acceptance of performance-based solutions to appropriately manage this matter without imposing prescriptive parking conditions. We therefore seek confirmation that the General Terms of Approval for this application will reflect this contemporary and pragmatic RFS practice.

2. Effective Slope Assessment – South-Western Aspect

The slope analysis within the Bushfire Threat Assessment has been updated to reflect verified slope measurements derived from a detailed LiDAR survey. This survey was prepared by Delf Lascelles Consulting Surveyors and is referenced as '24200 LiDAR Detail' dated 9/4/2024

The updated Slope and Vegetation Assessment contained in the Amended Bushfire Assessment Report (**Figure XX**) now accurately delineates slope transects and effective slope values across the site, including the south-western aspect. This updated data confirms that the majority of slope conditions in the south-west range from 1.0° to 5.9° downslope, with specific transects (e.g., T18, T19, T21) validating the classification originally used in the bushfire assessment.

This LiDAR-derived slope verification satisfies the RFS request for supporting survey evidence prepared by a registered surveyor.

We trust this response is sufficient to allow the RFS to prepare and issue General Terms of Approval, and subsequently allow Council to continue to determine the application, however, should any further information be required, please do not hesitate to contact the undersigned via phone on 0400 917 792 or email at <u>stuart@bfpa.com.au</u>.

Yours sincerely

Stuart Greville Director Accredited Bushfire Practitioner BPAD-26202

