

16 August 2023

Dear [REDACTED],

CLAUSE 13.02-1S SUMMARY ASSESSMENT FOR THE PROPOSED DEVELOPMENT PLAN FOR 3, 21, 29, 31 AND 39 DRAPER ROAD, HEYFIELD

Fire Risk Consultants (FRC) has been engaged to consider and provide a response to the matters raised by CFA in their letter dated 7 July 2023. The CFA response relates to the creation of a Development Plan for the proposed subdivision at 3, 21, 29, 31 And 39 Draper Road, Heyfield.

As required by Clause 43.04 of the Wellington Planning Scheme, Development Plan Overlay – Schedule 11 (DPO11), a Development Plan is required to be established. The Development Plan requirements is outlined within DPO11 and does not specifically state that bushfire risk should be considered. It does indicate that Council must be satisfied that any requirements of the Country Fire Authority have been met. In the preparation of this assessment, it has been assumed that the endorsement of a Development Plan does not exclude the requirement to consider the Clause 13.02-1S policy during the Planning Permit stage of the project.

As with large areas of the Wellington Shire Council municipality, there is a bushfire risk and the potential for bushfires to threaten or impact on this development is considered likely. However, the development is surrounded by properties within a Rural Living Zone which allows for lifestyle sized properties. These properties tend to create a highly fragmented landscape which reduces the bushfire risk in the surrounding area.

The key consideration of this assessment is to determine if a Clause 13.02-1S assessment is required at this stage of the project or it can occur in support of a Planning Permit application for the subdivision. To support the consideration of this matter, an initial assessment has been completed to address the Clause 13.02-1S matters that have also been outlined within the CFA correspondence. This is outlined within Table 1 below:

Table 1 - response to CFA recommendations

Item No.	CFA recommendation	Response
1	A bushfire risk assessment of the bushfire hazard and likely fire behaviour at the landscape and local scale be undertaken. This will help understand the fire context and whether the policy objectives of Clause 13.02-1S have been achieved. A localised bushfire hazard site assessment should identify bushfire hazards, including vegetation	<p>The development site is not located within a Bushfire Management Overlay (BMO). Whilst it is acknowledged that this is not the only trigger for the activation of an assessment against Clause 13.02-1S, it does indicate that the landscape does not include any areas considered to be an 'extreme' risk.</p> <p>The entire development is contained within a Bushfire Prone Area which indicates that the level of risk present within the landscape is considered to be effectively</p>

	classification and relative slopes located within proximity of the site.	<p>addressed by a construction solution only. The introduction of defensible space, water supply and setback conditions would not normally apply to this type of development.</p> <p>An assessment against Clause 13.02-1S will identify if a landscape bushfire risk is present and provide recommendations if this should be considered. The development is within an area that the dominant vegetation is grassland when assessed against AS3959. This along with the minimum property size of 4,000m², the ability to introduce conditions through the Planning Permit phase of the project is likely to be effective when compared against the level of bushfire risk.</p>
2	Information on alternative locations for development and justification why the site and surrounds is appropriate to encourage an increase in residential population given the bushfire risk.	<p>The development is located within the middle of a Rural Living Zone which has resulted in a highly fragmented landscape in the surrounding area. The size of the properties will also enable the ability to introduce building envelopes which will ensure the new dwellings are located away from any classified vegetation.</p> <p>The development of this property will likely reduce in less grassland classified vegetation and therefore a reduction in bushfire risk in the landscape.</p>
3	Details on the availability of safer areas and evacuation options in the event of an emergency.	The development is within proximity to the Heyfield township which consists of a main street, residential; properties and large areas of open space which would be considered a safer location.
4	Details on the ability of the proposal to achieve radiant heat exposure benchmarks. Bushfire policy seeks that radiant heat exposure no greater than 12.5kW/m ² is achieved.	<p>As the development is creating properties with a minimum 4,000m² size, the ability to achieve a less than 12.5kW/m² exposure is achievable.</p> <p>The surrounding landscape is primarily grassland, modified vegetation and managed lawns.</p>
5	Details of the road networks and access and egress opportunities to and from the site.	The access and egress opportunities are considered excellent and there are at least two options to travel into Heyfield in the event of a bushfire approaching the area.
6	<p>Details of any proposed bushfire protection measures to reduce bushfire risk that will form part of the proposal that could include the following:</p> <ul style="list-style-type: none"> Identified setbacks from classified vegetation that will ensure radiant heat exposure of no greater than 12.5kW/m². Requirements for vegetation to be managed in areas identified for the purposes of defensible space. 	<p>The identification of bushfire protection measures will be achieved through the Planning Permit process. This will be managed by addressing Clause 13.02-1S and the understanding that the building regulatory system will require the new dwellings to be assessed against AS3959 and the relevant BAL construction level being implemented.</p> <p>There is also the opportunity to implement through the Planning Permit process the creation of defensible space and other bushfire protection measures.</p>

<ul style="list-style-type: none"> • Landscaping to be of a bushfire responsive design. • Incorporating a perimeter road in areas that are adjacent to classified vegetation or bushfire hazards. • Identification of building envelopes on lots identified to include setbacks for the purposes of defensible space. • The provision of non-combustible fencing where future development abuts a grassland hazard. • Requirements for vegetation to be managed to a low threat state and maintained to ensure a bushfire risk doesn't increase over time. 	<p>Due to the size of the properties, it is not seen as necessary to introduce a perimeter road as an equal level of protection can be created through the Planning Permit process with the properties being required to achieve Defensible Space requirements on part or the whole property. The Guideline outlined within the CFA response indicates that perimeter roads are the preferred design outcome however it also indicates that other mitigation measures are deemed acceptable providing the required justification is provided.</p> <p>The following bushfire protection measures would likely address the level of risk present in the landscape:</p> <ul style="list-style-type: none"> • Introduction of defensible space to the property boundaries. • Provision of static water supplies for firefighting purposes. • Identification of building envelopes located towards the front of the properties close to the road access point and not exposed to more than 12.5kW/m². • The construction of the properties to an identified BAL following the outcome of the Clause 13.02-1S assessment that is completed at the Planning Permit stage of the process.
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Discussion

There is a lack of forested vegetation within the surrounding landscape that is indicated by there being no BMO on and around the property.

Whilst it is acknowledged that there are extensive areas of forested vegetation to the north and north west of the development that is contained within Public Land Reserves, due to the separation distance and the surrounding Rural Living Zone, the landscape bushfire risk is considered manageable through the implementation of bushfire protection measures. In several cases, the surrounding properties could be considered as having 'excluded vegetation' following an assessment against clause 2.2.3.2 of AS3959.

The proposed Development Plan indicated the need to consider bushfire risk however the assumption has obviously been made that this can be managed during other stages of the subdivision approval process. As the properties are not within the BMO, then the risk can be considered as lower, and the assessment of bushfire risk and the development of protection measures can be considered at the subdivision Planning Permit phase.

All the proposed bushfire protection measures outlined within the CFA letter can be addressed through the next stage of the planning approval process.

Conclusion

It is considered highly likely that this development will achieve a satisfactory outcome following an assessment against Clause 13.02-15.

The low-risk landscape surrounding the development will ensure that the risk does not elevate over time and along with the likely introduction of defensible space conditions through the Planning Permit process will achieve a satisfactory level of safety.

If you have any questions or require clarification on any aspect of the information contained within this letter, please don't hesitate to contact me on [REDACTED]

Kind regards,

[REDACTED]

[REDACTED]

Risk and Emergency Planning Lead
Fire Risk Consultants