

13 November 2019



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## **CFA Submission to: C106 and Beveridge North West Precinct Structure Plan**

Thank you for providing CFA with the opportunity to comment on Planning Scheme Amendment C106 to the Mitchell Planning Scheme and the associated Beveridge North West Precinct Structure Plan (BNWPSP).

CFA has reviewed all the supporting documentation, however, our comments below largely focus on the submitted Explanatory Report, proposed planning scheme controls, the BNWPSP and the Bushfire Development Report for the BNWPSP prepared by Terramatrix (July 2019).

CFA provides the following information for your further consideration:

### **An Overview of Bushfire Policy Considerations**

#### Landscape Risk and Bushfire Hazard Assessment

CFA has reviewed the assessment of landscape risk and classifiable vegetation within closer proximity to the BNWPSP boundary (included in the Bushfire Development Report [‘the report’]) and generally agrees with the information provided and acknowledges the issues raised in the report.

CFA recommends further discussion occur regarding the final assessment of vegetation as it will likely effect the location and distance for required setbacks.

#### Alternative Locations for Development

An assessment of alternative locations for future development does not appear to be addressed in any of the supporting amendment documentation at this time. CFA recommends that this policy be considered within the context of an amended Explanatory Report that expands its assessment against current bushfire policy, namely Clause 71.02-3 and Clause 13.02-1s.

#### Availability of Safer Areas

The submitted Bushfire Development Report includes some consideration of the concepts that strongly relate to this area of policy (see Section 2.2-2.4) however it does not specifically address the issue. Whilst the explicit sections of policy are not independently discussed, CFA is satisfied that the issue has been addressed indirectly in the report and that lower risk locations are readily identifiable within and adjacent to the BNWPSP boundary.

Whilst it is accepted that these areas are available, additional opportunities exist to improve pedestrian access and incorporate better opportunities to move away from bushfire risks in the event of an emergency.

#### Site Based Exposure

The Precinct Structure Plan (PSP) and supporting amendment documentation, including the report, include detailed information discussing exposure benchmarks and associated policy and requirements such as setbacks, perimeter roads and construction requirements. These bushfire protection measures are clearly seen as a pivotal part in reducing bushfire risk for the future community.

However, the report identifies several issues in respect to this policy which have either been suggested to be deferred to later in the planning process, are not fully resolved or have not been captured within the BNWPSP or planning scheme documentation. For example, the location, size and management of setbacks from bushfire hazards remains outstanding, even though both the PSP and schedule propose to include some requirements.

There a number of options available to resolve these and similar issues. For example, providing more certainty around future vegetation management expectations on public land and where these requirements will apply would provide more assurance around location and size of setbacks. Linking the size and setbacks to a table to sit within the BNWPSP would also assist.

CFA would welcome the opportunity to further discuss enhancing the bushfire response for the BNWPSP.

#### **Planning for CFA Service Delivery and Operational Response**

Based on the future extent of development in this area and an analysis of available CFA service delivery resources, an addition fire emergency facility (including a fire station) will be required to be accommodated within the boundary of the BNWPSP.

A suitable location of the facility will be required to be between 4000-6000sqm in size and have adequate access and egress opportunities suitable for emergency vehicles. CFA recommends further discussion occur regarding suitable siting opportunities before the BNWPSP is finalised.

CFA recommends that:

- The BNWPSP be updated to show a location for the proposed facility in agreement with a preferred location to the satisfaction of CFA.
- That Section 3.2.2 - Community Facilities and Education be updated to reflect requirements, to provide such a facility and that G38 be expanded upon.
- That the emergency facility be added as appropriate to Appendix 4.

## **Beveridge North West Precinct Structure Plan**

CFA provides the following advice in response to the proposed requirements, guidelines and plans contained within the BNWPSP:

### Link to Bushfire Development Report

- Demonstrate how the recommendations in the bushfire report have been / will be incorporated into the plan. For example, have any changes to the road network been proposed to northern vegetated areas.

### Locations where a setback should apply

- CFA recommends that the areas of the BNWPSP where a setback from a bushfire hazard is required is expanded to be generally in accordance with the plan '*Potential BAL 12.5 Development Setbacks*' contained within the submitted Bushfire Report.

Please note that these areas may be subject to change depending on further discussions with CFA and resolution of outstanding issues regarding vegetation management and classification. Further consideration on other linked parts of the plan such as Fig 11 – Linear Park Interface Concept Plan may also need to be amended to ensure adequate setbacks will be met to achieve maximum radiant heat exposure benchmarks.

### Incorporating bushfire requirements into the BNWPSP

- CFA recommends that Section 3.4 Biodiversity and Bushfire:
  - Include all relevant requirements and guidelines pertaining to bushfire management. This will require either creating new relevant requirements and potentially moving some requirements from other sections of the plan. Areas where suitable bushfire requirements / guidelines could apply include vegetation management, setbacks/buffers, requirements for land adjoining bushfire hazards, public open space, draining reserves, road design, access and egress routes, site management and construction standards.
  - Cross reference other relevant information in the plan such as figures, maps or plans.
  - Add bushfire specific figures, maps and plans to assist in the interpretation of bushfire requirements, for example, a separate plan showing location of bushfire hazards and interface areas.
  - That R10 be amended in accordance with typical access level 1 and 2 requirements with the exception of Access Street Level 2 which be increased to a minimum width of 7.5m in width. Information regarding slope should also be considered in respect of Table 11, Street and Slopes. Please note that further discussion with VPA and CFA is recommended before changing these requirements.
- Ensure bushfire requirements are clear and consistent with general bushfire language i.e. use terms such as bushfire protection measures and ensure consistency with vegetation management requirements in accordance with Table 6 of Clause 53.02, unless otherwise agreed by CFA.

- Minimise conflicts between policies, requirements and guidelines. For example:
  - Table 2 includes potentially conflicting setback requirements to Old Sydney / Urban Growth Boundary (Column A); or.
  - Requirement R7 requires trees in streets, civic places and the open space network to be planted to facilitate a continuous tree canopy cover. Typical vegetation management for bushfire purposes requires some (usually 2m in this type of landscape) tree canopy separation. This may be able to be tailored in certain areas of the BNWPSP, however the requirements would need to be updated to reflect this.
- Include policy that ensures dwellings and other buildings do not back onto areas of unmanaged vegetation or bushfire hazards.
- Encourage links to vegetation management and bushfire risk reduction in Section 3.3 – Open Space, Community Facilities & Education, in either a separate guideline or in consideration of existing guidelines, particularly in G28-G30. Also consider adding reference to the level of vegetation management required in locational attributes or separate column within Table 10 – Credited Open Space Delivery Guide.
- Ensure Section 3.17 Precinct Infrastructure Plan and Staging links to vegetation management and bushfire risk.

#### Planning Provisions

The planning provisions currently lack integration with the bushfire requirements that will demonstrate how bushfire policy outcomes will be achieved, other than the need to submit a Site Management Plan to manage non-permanent hazards.

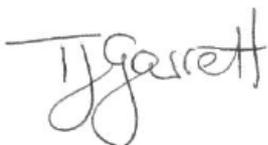
CFA recommends that additional requirements that focus on the submission of a Bushfire Management Plan be required. The plan should be required how all the bushfire protection measures will be linked with the objectives, guidelines and requirements associated with the BNWPSP.

#### **Conclusion**

CFA would welcome the opportunity to further discuss bushfire response and CFA's service delivery requirements to the BNWPSP.

Should you have any enquiries please don't hesitate to contact either Anne Coxon (Land Use Planning Coordinator) on 9262 8614 or Tammy Garrett (Manager Community Safety) on 0400 647 000.

Yours sincerely



**Tammy Garrett**  
**Manager Community Safety**  
**North East Region**