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Our patron, Her Excellency the Honourable Linda Dessau AC, Governor of Victoria

CFA Fire Prevention and Preparedness
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5 October 2021

Mat Garner
Victorian Planning Authority
Level 25, 35 Collins Street
Melbourne VIC 3000

Dear Mat,

PRELIMINARY COMMENT

Proposal: Wallan East Precinct Structure Plan - Preliminary Bushfire Assessment

Thank you for providing CFA with the opportunity to provide preliminary comments on the *Wallan East Part 1 Precinct Structure Plan – Bushfire Development Report (v.1.0, April 2021)* (BDR) prepared by Terramatrix for the land to form Part 1 of the Wallan East Precinct Structure Plan (Wallan East PSP).

CFA can provide the following comments for your further consideration:

General

CFA broadly agrees with the review of bushfire hazards and risks located within the identified area, as well as the local and broader landscape context. When viewing this area in terms of directing development to this location, there are a number of favourable factors subject to the appropriate incorporation of bushfire protection measures and design of the bushfire interface.

There are some areas of difference that CFA highlights throughout the remainder of our comments. However, these distinctions are not considered significant or likely to change the level of acceptability for this PSP area to direct growth and the expansion of Wallan East.

The BDR includes a number of recommendations, most of which are also supported to be adopted by CFA. CFA considers the BDR to be very comprehensive and fair in outlining additional information or relevant considerations, particularly around policy ordinances and the PSP layout/design, vegetation management and road design. CFA recommend that these matters be further captured in the finalised PSP and supporting amendment.

Bushfire Hazard and Vegetation Assessments

CFA has not been able to attend the site to undertake a site visit, to confirm the BDR's assessment of localised hazards.. CFA would still like to physically review areas up to 1km away from the site in various directions, to better understand the effects of topography and

vegetation structure and management on fire behaviour. In the meantime however, we can provide the following comments:

Landscape Assessment

CFA generally supports the discussion of landscape bushfire risk contained within the BDR, including that:

- The land within the Wallan East PSP is generally flat;
- The land within the wider area has some undulation; and
- That the predominant vegetation type is grassland.

However, CFA also notes that:

- Whilst the area within and immediately around the site is flat, there is more variation in the terrain as you move away from the site to the east and west, towards more vegetated environments.
- The report would benefit from recognition of these other conditions within the wider landscape, including their contribution to certain fire behaviour and different conditions.

The BDR has noted that using the landscape typologies as a guide, there is presence of Type 2 and 3 characteristics, which CFA considers as a fair analysis of the conditions.

CFA encourages the precautionary approach to the assessment of landscape risk adopted within the BDR.

Local Bushfire Hazard Assessment

At the local scale, CFA generally supports the assessments on each aspect within the BDR. It is noted that there are a few anomalies between the report and the maps in the report with alternating references to woodland and/or forest. Confirmations via a site visit may be required, as well as a discussion on the future management of the Merri Creek corridor and how this may impact on the bushfire behaviour.

Precinct Vegetation

The BDR provides a detailed discussion around the vegetation that is both existing and potentially to be retained within the PSP area itself i.e. within open spaces, drainage reserves and waterway corridors.

CFA supports the consideration and final determination of the future vegetation structures within the PSP as this is necessary to both identify in the PSP guidelines and as future requirements such as setbacks. As noted in the BDR, it also influences the assessment of certain bushfire policies such as radiant heat exposure.

CFA would welcome the opportunity to discuss future assumptions with VPA, Council and Terramatrix as the proposal progresses, including whether roadside vegetation can be included as excluded or whether there is an appropriate variation given the location of this vegetation, combined with the extent of grassland and lack of slope in the immediate surrounds.

Zoning and Land Use

Whilst CFA has not been provided with any draft PSP documentation, the BDR includes reference to a draft land use plan for the Wallan East PSP (figure 2) and shows another option within other maps in the same document. CFA understands that this report has been prepared to assist the ongoing development of the Wallan East PSP and that various outcomes are likely still under consideration. CFA supports much of the discussion in the BDR regarding land use, including:

- Locating the proposed government school in the lowest risk area of the PSP is desirable. Good access networks both pedestrian and vehicular are also encouraged.
- Locating the proposed local sports reserve and its potential to act as a further 'buffer' and enhance community resilience to bushfire. CFA also recommends that suggestions around location of the convenience centre and indoor recreation centre also be adopted in the final PSP outcome.
- CFA agrees with comments that identify the role that parks and other maintained areas can play in practically separating development from bushfire hazards.
- CFA agrees with the comments in Section 4.1.3 in the report regarding lot sizes and layout. CFA would encourage either a medium or higher density outcome on the outer northern and eastern edge of the proposal (draft nomination as low density) as this would then limit the need to rely on private lot owners to manage vegetation reduce bushfire risk on their property over time.

Setbacks and the bushfire hazard interfaces

A number of sections within the BDR refer to the need to ensure that future development will be required to enable construction standards of BAL 12.5 and radiant heat exposure not greater than 12.5kw/m².

Any setback that is provided to ensure the above requirements are met will also require vegetation management in accordance with standard defendable space principles or to a low threat status, depending on the situation. The setbacks will vary depending on the end outcome of vegetation in the PSP itself, but the distances should be in accordance the options outlined in Table 3 of the BDR.

Maps 2, 4 and 6 are considered useful in facilitating the review of required setbacks and vegetation management. CFA welcomes further opportunities to comment as this work progresses.

CFA encourages careful consideration of areas around the railway line and aspects that are most likely to have an ongoing bushfire interface into the future. This should be particularly addressed in the PSP and future planning scheme amendment. CFA also encourage early conversations with the railway corridor land managers to understand the fuel management plans and requirements.

Management of Interim Bushfire Risks

CFA supports future policy that encourages interim bushfire risk management protocols be adopted, as generally suggested within Section 2.5.1 of the BDR. In addition to creating links in the zoning ordinance, CFA would also recommend adding a link to the guidelines and requirements within the PSP.

Access and Road Network

Perimeter roads play an important role in separating development from bushfire hazards. The BDR considers a number of relevant design factors in Section 4.2.3. CFA strongly encourages the adoption of the use of perimeter roads, where they are not used, significant justification in the amendment material would be expected.

CFA would encourage the implementation of multiple access points in and out of the site, and within the site where there are restrictions towards the Western and Southern areas of the PSP, such as waterways, railway lines, future drainage reserves. This would ensure better connectivity, emergency vehicle access and community evacuation options.

Policy Links and other Bushfire Protection Measures

Additional incorporation and adoption of bushfire protection measures within the PSP that assists in building community resilience or reducing risks is also encouraged, such as the use of non-combustible fencing materials or encouraging bushfire responsive housing designs.

When developing the PSP, CFA recommends that policy captures relevant bushfire objectives, guidelines and requirements. Careful consideration should also be given to ensuring that other objectives, guidelines or requirements in the finalised PSP do not create any conflicts with bushfire requirements, particularly landscaping and open space policy.

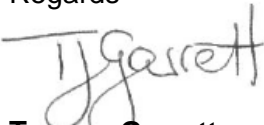
Links to the bushfire outcomes and requirements should also occur in any policy ordinance response.

Moving Forward

CFA again wishes to thank you for engaging with us early in this process and we look forward to working with you on this project as it proceeds.

If you would like to discuss this response, please do not hesitate to contact Anne Coxon on 9262 8614 or a.coxon@cfa.vic.gov.au or Tammy Garrett on 8739 4012 or t.garrett@cfa.vic.gov.au

Regards



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North East Region