



Tasmania Fire Service

Bushfire Risk Unit

File No: AD162-02

Tasmanian Planning Commission
tpc@planning.tas.gov.au

Attn: Lauren O'Brien

Dear Lauren,

RE: WEST TAMAR LPS – DRAFT AMENDMENT 02/22 – REZONE VARIOUS LOTS FROM ENVIRONMENTAL MANAGEMENT TO LANDSCAPE CONSERVATION

I write in response to the Commission's letter to Tasmania Fire Service (TFS) dated 21 December 2022.

The Draft Amendment seeks to rezone multiple private tenure properties at York Town from Environmental Management to Landscape Conservation. The main purpose of the Draft Amendment (as described in Council's s.40F report) appears to be to allow for Residential use and development, which is currently prohibited within the subject properties.

TFS visited York Town on 28 February 2023 to verify site conditions and to inform a response to the Commission's letter. I have responded to each item of the Commission's request in turn.

- ***The level of potential bushfire hazard based on the existing landscape conditions of the local area surrounding the northern section of York Town.***

It is understood the request relates to lots proposed for rezoning that are located between Bowens Road and Aldridge Street. This includes 16 lots, 7 of which appear to have been developed at present.

Undeveloped land on Aldridge Street contains native forest on steep (approximately 20°), south-facing land. The vegetation is characterised by a eucalypt canopy (approx. 30m average height) with a dense shrub understorey (Figure 1). For the purposes of Bushfire Attack Level assessment using Australian Standard 3959:2018 – Construction of buildings in bushfire-prone areas, the predominant vegetation classification is 'Forest'.

Infrastructure within the Aldridge Street reservation (carriageway and power lines) has created a narrow break in the surface and elevated fuel layers and a slightly larger break in the canopy fuel layer. The Forest vegetation within the Aldridge Street lots and road reserve is contiguous with significant tracts of Forest to the north and west.

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Vegetation within the Bowens Road properties is more fragmented, containing a mix of low threat vegetation (managed landscape), Grassland and Forest.

From a landscape risk perspective, the Aldridge Street properties are exposed to long fire runs to the northwest and west, which are the most likely directions of attack under dangerous fire weather conditions for the area. Future development on the lots would also potentially be vulnerable to fire from the south due to the steep topography. By comparison, the Bowens Road properties benefit from flatter topography, their location below Forest fuels to the north and the fragmentation of Forest vegetation to the south.



Figure 1 – Forest vegetation on southern side of Aldridge Street

- ***The potential spatial extent of vegetation clearance that is likely to be required for a single dwelling on currently vacant land at York Town between Aldridge Street and Bowen Road.***

Future single dwellings (class 1a buildings) on the subject lots would be required to comply with the *Director's Determination – Bushfire Hazard Areas v1.1* (or subsequent future versions). The relevant Deemed-to-Satisfy requirements specify that class 1a buildings on pre-existing lots must be provided with a hazard management area with minimum dimensions to achieve a Bushfire Attack Level of BAL-29.

The hazard management area dimensions needed to achieve BAL-29 depend on several variables and are derived through reference to Table 2.6 of AS 3959:2018. The approximate spatial extent (and area) of hazard management areas for new single dwellings on currently vacant lots is provided in Appendix A. It is important to note:

- The areas provided in Appendix A are approximate only. They have been determined based on limited contour information available through the LIST combined with onsite observations and assumed building locations.

- Future bushfire assessment of future dwelling proposals would require more precise assessment of effective slopes based on the location of future proposed dwellings. It is possible that, depending on the results of detailed site survey and proposed building siting, additional clearance may be required.
- Alterations and additions to existing habitable buildings would also likely require additional clearance for hazard management area purposes. Like the requirements for new buildings, the minimum separation would need to be sufficient to achieve a Bushfire Attack Level of BAL-29. This is not shown on Appendix A.

Within the hazard management areas, most understory vegetation would need to be removed. A significant portion of trees would likely need to be removed however it is likely that some mature trees could be strategically retained as part of a future development proposal.

Whilst there may be some variations to the total areas referred to above, clearly a significant portion of the undeveloped lots accessed from Aldridge Street would need to be converted to hazard management area to achieve Deemed-to-Satisfy building compliance. Development on properties fronting onto Bowens Road would by comparison would require less clearance of native vegetation.

Several other relevant considerations should be considered:

- Maintenance of hazard management areas on land with slopes up to 20° is unlikely to be practicable for most landowners, which doubt with respect to long-term compliance;
- New residential development on at least three of the lots would likely require formalising Part 5 Agreements (or easements) with neighbouring owners to establish compliant hazard management areas; and
- Vegetation removal on lots accessed from Aldridge Street would need to demonstrate compliance with the requirements of the Landscape Conservation Zone (specifically clause 22.4.4 Landscape Protection), the Natural Assets Code and the Landslip Hazard Code.

• The suitability of Aldridge Street to provide access for firefighters and residents during a bushfire event.

Aldridge Street appears to service a total of six (6) existing residential dwellings at present. The proposed rezoning would potentially allow for a further seven (7) single dwellings to be accessed from the existing street.

At the time of inspection, the following observations were made in relation to Aldridge Street:

- The existing carriageway is unsealed, which is considered acceptable given the gradient appears to generally be under 10°;
- The existing carriageway is relatively narrow – measurements taken at various points along the road found the carriageway varied between 2.7m - 3.7m;

- Vegetation either side of the carriageway does not appear to be regularly maintained;
- There are few locations that are considered suitable to accommodate vehicle passing or that would allow a fire appliance to change direction;
- There are no obvious alternate routes available for road users in the event the road was obstructed (e.g., by fallen trees or road accident).

Figures 2 and 3 show two sections of the existing road.



Figure 2 – Aldridge Street as viewed from intersection with Greens Beach Road



Figure 3 – Example of Aldridge Street's existing condition with unmanaged roadside vegetation

Compared to the minimum standards provided in the Bushfire-Prone Areas Code, the existing road is well below the minimum standards for both public roads and individual private accesses.

TFS is of the view that the existing standard of Aldridge Street would potentially present significant challenges for firefighters and residents in a bushfire emergency. The minimal width, passing and turning opportunities indicates there would be significant potential for conflict between accessing and egressing vehicles. This would likely be exacerbated during smoky conditions when visibility may be compromised. The road capacity and the unmanaged roadsides would foreseeably have a detrimental impact on the efficiency and safety of firefighter intervention and resident evacuation.

Allowing further intensification of residential uses on Aldridge Street in its current condition is not supported by TFS. In our view, intensification of use should be supported by appropriate road improvements to avoid exacerbating an existing unacceptable risk exposure.

If TFS can provide any further advice or information to inform the Commission's assessment, please contact me at tom.oconnor@fire.tas.gov.au or on 0438 101 367.

Yours faithfully,




Tom O'Connor
SENIOR PLANNING & ASSESSMENT OFFICER

9 March 2023

APPENDIX A

POTENTIAL BAL-29 HMA FOOTPRINT	
LOT NO.	HMA AREA
CT 28428/7	4000m²
CT 104304/1	2800m²
CT 100857/1	2800m²
CT 19737/5	2800m²
CT 19737/6	2800m²
CT 124515/7	2800m²
CT 108744/1	2800m²
CT 15059/1	2200m²
CT 208911/1	2100m²
TOTAL HMA AREA	20,300m²



 Tasmania Fire Service	ISSUE	APPROVED	DATE	AMENDMENT	NOTES - all dimensions are in meters - written dimensions take precedence over scaled measurements - FOR DEMONSTRATION PURPOSES ONLY - NOT FOR BUILDING COMPLIANCE			TITLE WEST TAMAR LOCAL PROVISIONS SCHEDULE DRAFT AMENDMENT 02/22 PROPOSED REZONE ALDRIDGE STREET, YORK TOWN POTENTIAL HMA FOOTPRINTS		
	01	TOC	06.03.2023							
					DRWN SG	APPR'D TOC	DATE 06.03.2023	FILE BPP	DWG NO. TFS-WS01	SCALE 1:2500