



Tasmania Fire Service

Bushfire Risk Unit

File No: AD3696

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

Attn: John Ramsay

Dear John,

DRAFT CLARENCE LOCAL PROVISIONS SCHEDULE – DIRECTIONS TO THE TASMANIA FIRE SERVICE

I write in response to the Commission's Directions Schedule dated 16 November 2020 following the recent Clarence LPS hearings.

The Commission requested a submission from the Tasmania Fire Service on the following matters:

With reference to the planning authority's section 35F report and the further submissions dated 14 October 2020 and 12 November 2020, provide comment on whether any bushfire planning issues arise from the following zone revisions recommended by the planning authority:

- (a) Rural Living Zone (Area B) to Rural Living Zone (Area A) at:
 - i. Mount Rumney (in the Acton Park/Cambridge corridor)
 - ii. Geilston Bay
 - iii. Sandford*
- (b) Rural Zone to Rural Living Zone (Area A) at the Kadina Road settlement, Cambridge;*
- (c) Rural Living Zone and Low Density Residential Zone to Low Density Residential Zone and General Residential Zone in Lindisfarne Ridge/Flagstaff Gully.*

The areas referred to above are identified in Council's further submission dated 14 October 2020 and the relevant maps are enclosed as Appendix A to this submission.

Strategic consideration of bushfire risk

Land-use planning decisions have far-reaching and long-lasting consequences with respect to the exposure and vulnerability of communities to bushfire hazards. It is appropriate that bushfire risk be considered when rezoning land in bushfire-prone areas because it is at this stage that through that governments have the most leverage

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to avoid or minimise risk exposure and increase long term community resilience. Conversely, when land-use planning decisions do not adequately consider risks, they can inadvertently exacerbate long-term risks to life and property. The critical importance of land use planning and the growing need to manage risk exposure was recognised by the recent Royal Commission into Natural Disaster Arrangements.

Tasmania's existing strategic planning framework requires consideration of bushfire at a strategic level. In addition to the overarching Schedule 1 Objectives of the *Land Use Planning and Approvals Act 1993*, the *Southern Tasmania Regional Land Use Strategy 2010-2035* includes the following policies:

MRH 1 Minimise the risk of loss of life and property from bushfires.

MRH 1.1 Provide for the management and mitigation of bushfire risk at the earliest possible stage of the land use planning process (rezoning or if no rezoning required; subdivision) by the identification and protection (in perpetuity) of buffer distances or through the design and layout of lots.

MRH 1.2 Ensure subdivision road layout designs provide for safe exit points in areas subject to bushfire hazard.

MRH 1.3 Allow clearance of vegetation in areas adjacent to dwellings existing at the time that planning schemes based on this Strategy come into effect, in order to implement bushfire management plans. Where such vegetation is subject to a biodiversity code, the extent of clearing allowable is to be the minimum necessary to provide adequate bushfire hazard protection.

MRH 1.4 Include provisions in planning schemes for use and development in bushfire prone areas based upon best practice bushfire risk mitigation and management.

MRH 1.5 Allow new development (at either the rezoning or development application stage) in bushfire prone areas only where any necessary vegetation clearance for bushfire risk reduction is in accordance with the policies on biodiversity and native vegetation.

MRH 1.6 Develop and fund a program for regular compliance checks on the maintenance of bushfire management plans by individual landowners.

The documentation provided by Council in support of the proposed rezonings does not contain any specific consideration of the bushfire risk implications (or any other potential cumulative impacts) that may result from the proposed changes.

Council initially proposed to essentially transfer the existing IPS zonings to the equivalent LPS zonings. In response to representations received by local landowners however, Council has subsequently recommended that these areas be rezoned to allow for higher lot/dwelling yields.

Tasmania Fire Service is concerned that the risk implications of the proposed zone revisions have not been considered and it is unclear how the proposed zone revisions will satisfy the abovementioned policies. In particular, it is unclear how the changes would provide for the management and mitigation of risk at the earliest possible stage of the land use planning process.

Mount Rumney, Geilston Bay and Sandford

Tasmania Fire Service is particularly concerned with the proposed rezoning of land at Mount Rumney, Geilston Bay and Sandford from Rural Living (Area B) to Rural Living (Area A).

The proposed changes would reduce the minimum lot size requirement in these areas from 2ha to 1ha. Council has estimated that the additional lot yield would be in the order of:

- Mount Rumney – 92 additional lots;
- Geilston Bay – 16 additional lots; and
- Sandford – 288 additional lots.

Council's lot yield analysis acknowledges that no consideration has been given to natural values, landscape values, the potential future siting of buildings, infrastructure limitations or the requirements of any applicable Codes, hence the abovementioned lot yields are likely conservative. However, the zone revisions would clearly allow for an increased number of built assets and a larger population to be potentially be exposed to future bushfire events in these localities.

In each of these areas the existing settlement pattern is characterised by scattered low density residential dwellings within bushland. The existing subdivision patterns at Mount Rumney and Geilston Bay in particular has positioned existing dwellings upslope of surrounding bushland on steep topography.

Road infrastructure and access/egress routes in these areas generally falls significantly short of current standards for new public roads in bushfire-prone areas. The poor standard of road infrastructure in these areas is acknowledged Council's lot yield analysis.

At Geilston Bay, the existing lots are reliant on a single access/egress route via Piper Road. The Piper Road/East Derwent Highway junction has known safety issues which would only be exacerbated in an emergency situation. Should this junction eventually be closed and traffic redirected through a yet to be created Napier Street throughfare, the number of lots reliant on that route would be significantly increased. The absence of alternative access/egress routes and lack of safe refuges leaves the Piper Road community vulnerable to a range of potential fire scenarios.

At Mount Rumney the existing road infrastructure services a larger population that also has severely limited access/egress options. Sandford's road network is slightly better in that no-through roads are generally shorter and there are some available alternate access/egress routes.

Firefighting water supplies are limited to static supplies that are dispersed across some existing lots at Geilston Bay and Sandford and no analysis has been provided of TasWater's reticulated system at Mount Rumney.

The proposed rezonings would likely result in dispersed small subdivisions, many of which would need to be internal lots reliant with long and/or shared private accesses. The increased lot yield would intensify the use of – and reliance on – existing sub-

optimal infrastructure. In our view, the cumulative effects would exacerbate existing unsatisfactory risk exposures to residents and emergency personnel.

It is also noted that there has been no consideration given to the potential cumulative impacts associated with additional vegetation clearance within the Biodiversity Protection Overlay that applies at Geilston Bay and Mount Rumney.

Kadina Road, Cambridge

As with the preceding areas discussed above, it appears that no consideration has been given to bushfire risks associated with the proposed rezoning of the Kadina Road settlement.

The Kadina Road area is significantly less exposed than the previously discussed areas. Whilst access is limited to Kadina Road, the length of this street is not prohibitive and it provides a clear access/egress route away from the likely direction of attack. There are unlikely to be any major constraints in terms of occupant evacuation or emergency intervention in this area should further subdivision occur.

Lindisfarne Ridge/Flagstaff Gully

As with the preceding areas discussed above, it appears that no consideration has been given to bushfire risks associated with the proposed rezoning of land at Lindisfarne Ridge/Flagstaff Gully.

Allowing further infill development in this area would have some benefit in terms of reducing fuel loads associated with remnant bushland without placing new development at unacceptable risk. The land is effectively within an urban area with limited urban/bush interface and there are unlikely to be any major constraints in terms of occupant evacuation or emergency intervention in this area should further subdivision occur.

Summary and recommendations

The merit of intensifying development in highly exposed locations that are serviced by sub-optimal access/water infrastructure at Geilston Bay, Mount Rumney and to a lesser extent Sandford is questionable. It is recommended that the Commission does not support the proposed rezoning of these areas at this time.

Should Council wish to pursue the intensification of development at Geilston Bay, Mount Rumney or Sandford it is recommended that this be done as a separate scheme amendment process following more analysis of risk exposure, infrastructure, investment in mitigation measures and impacts on associated planning values.

The proposed rezonings at Kadina Place and at Lindisfarne Ridge/Flagstaff Gully are considered to be less problematic due to their respective locations and existing infrastructure and are generally acceptable to Tasmania Fire Service.

If the Commission would like any further information from Tasmania Fire Service in relation to the matters discussed in this submission please contact me at tom.oconnor@fire.tas.gov.au or on 0438 101 367.

Yours faithfully,

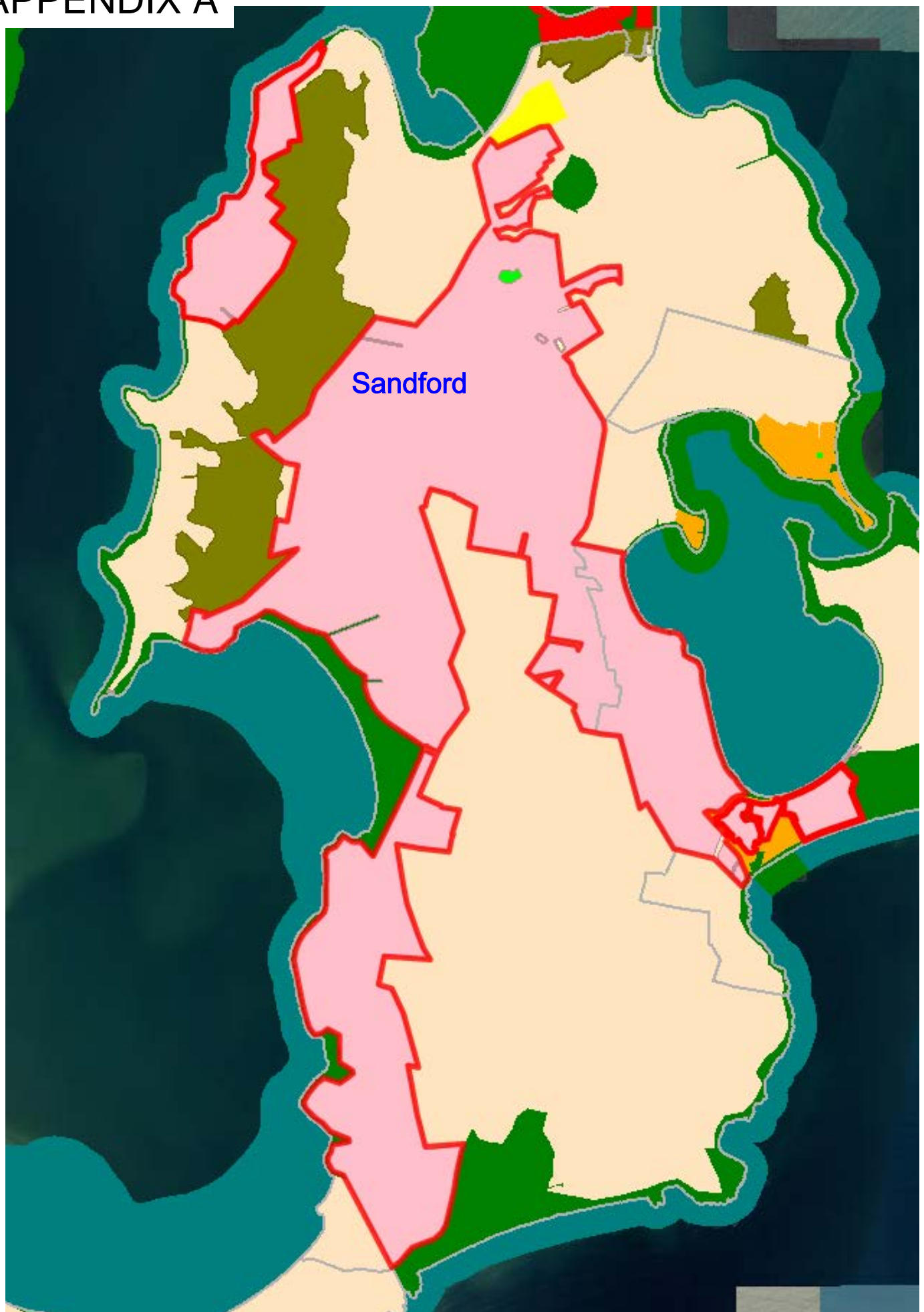
A handwritten signature in black ink, appearing to be 'Tom O'Connor', written in a cursive style.

Tom O'Connor

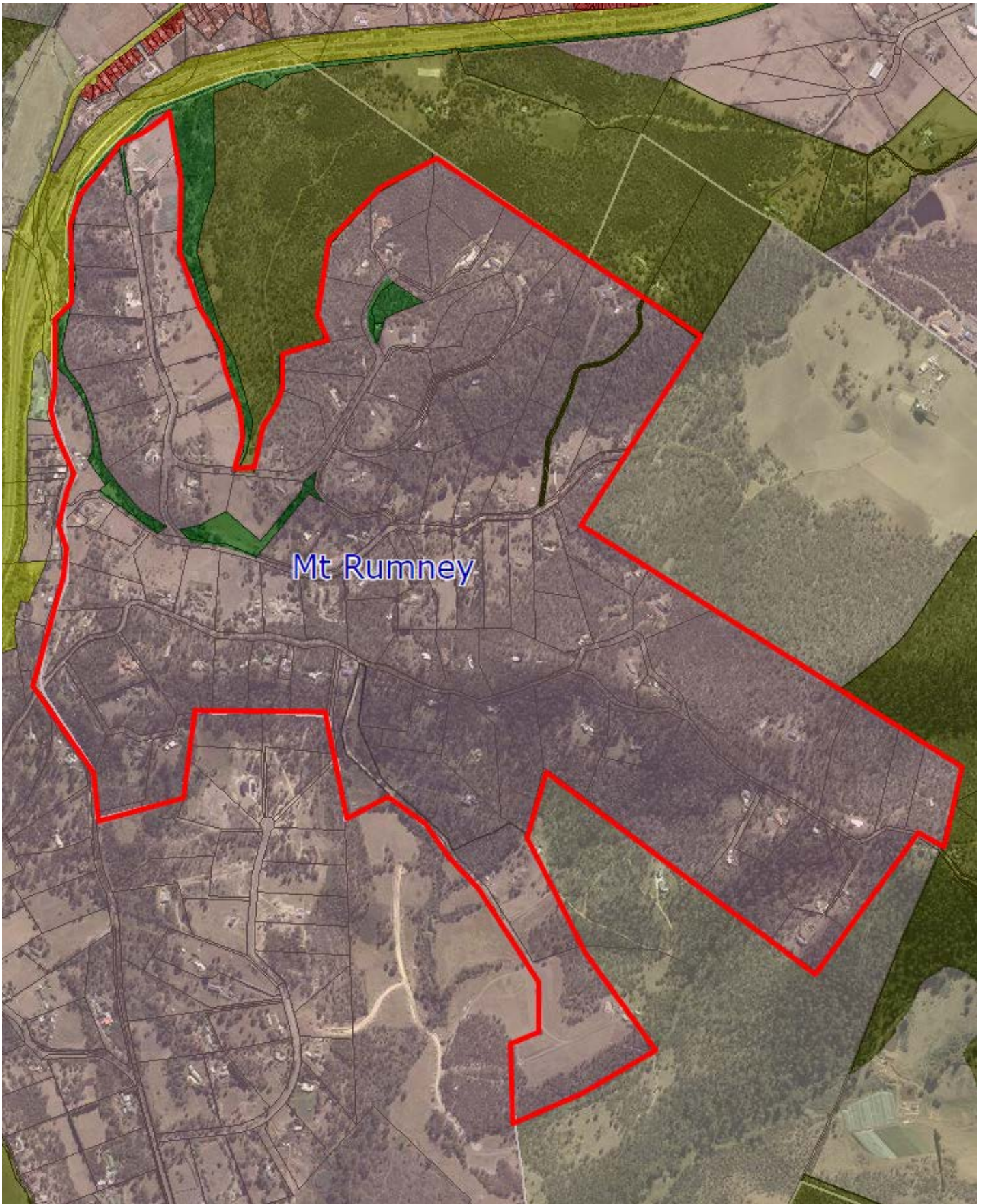
SENIOR PLANNING & ASSESSMENT OFFICER

27 November 2020

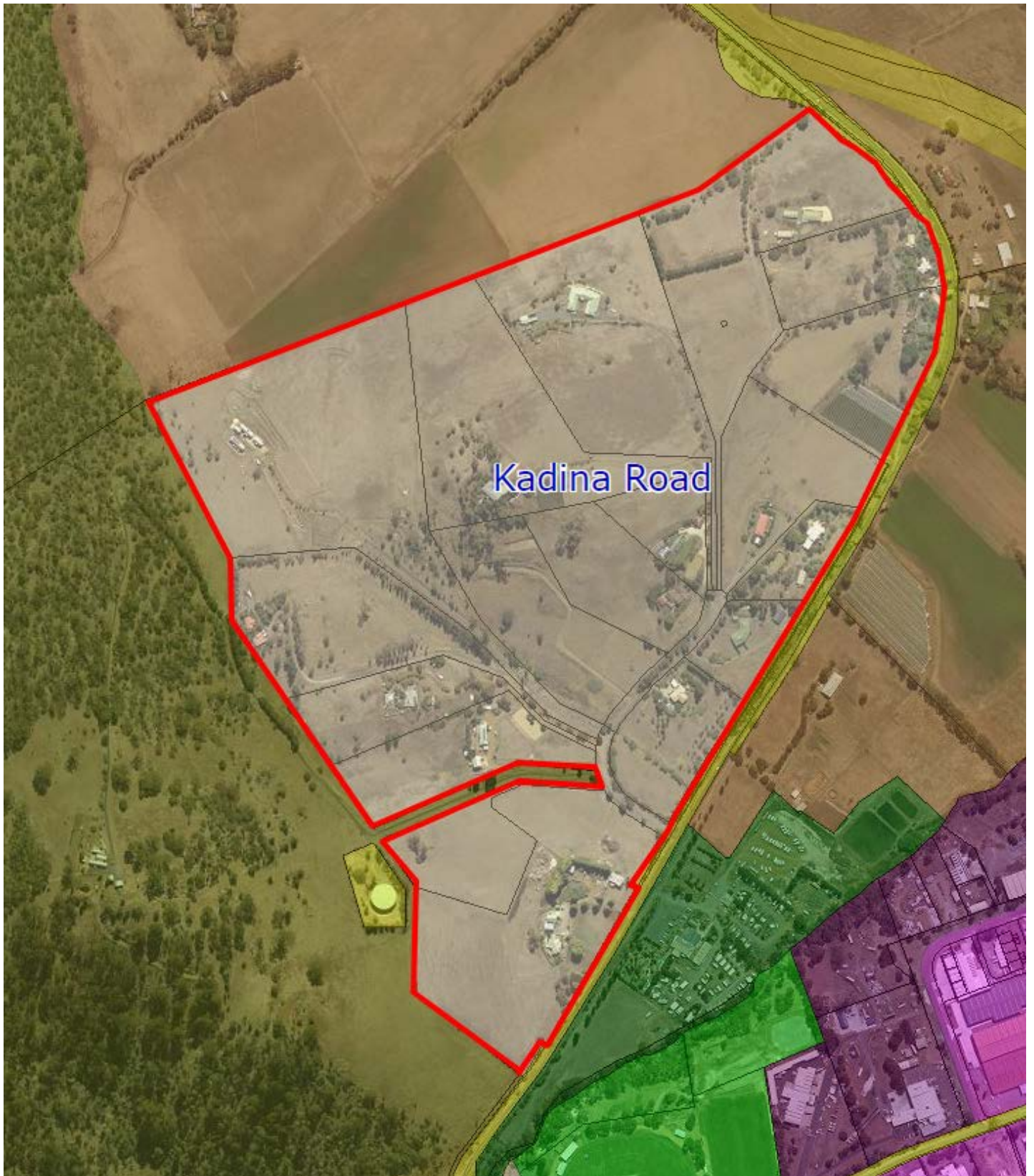
APPENDIX A



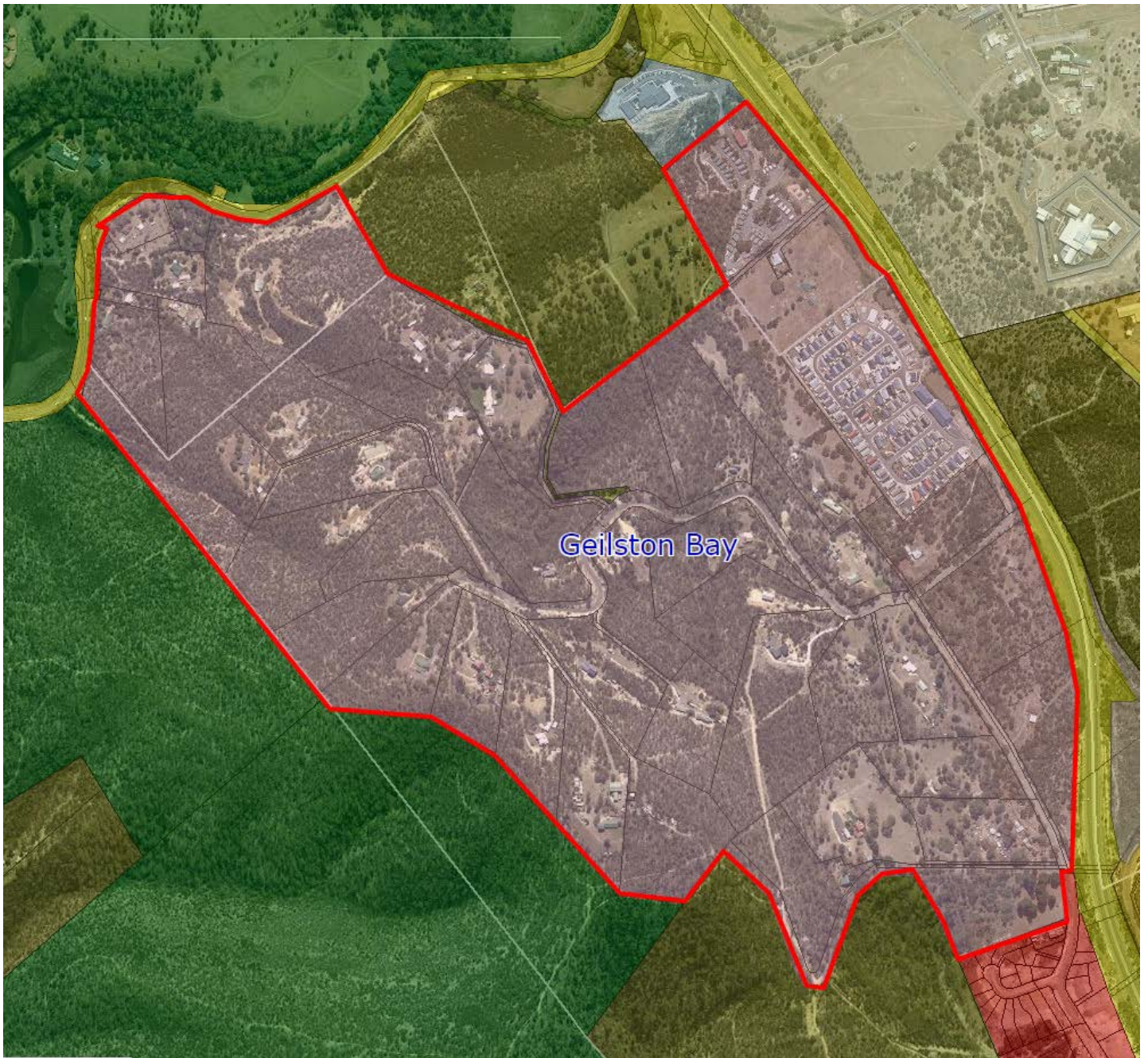
Sandford Rural Living Zone - Minimum Lot Size proposed to be reduced from 2ha to 1ha under the Draft Clarence Local Provision Schedule 2020



Mt Rumney Rural Living Area proposed for minimum lot size to be reduced from 2ha to 1ha



Kadina Road proposed to be zoned from Rural Resource to Rural Living with a minimum lot size of 1 ha



Geilston Bay proposed to be zoned from Rural Resource to Rural Living with a minimum lot size of 1 ha



Lindisfarne Rural Living Area proposed to be zoned Low Density Residential