



Tasmania Fire Service

Bushfire Risk Unit

File No: AD3703

General Manager  
Devonport City Council  
[council@devonport.tas.gov.au](mailto:council@devonport.tas.gov.au)

Dear Sir/Madam,

### **DRAFT DEVONPORT LOCAL PROVISIONS SCHEDULE**

I write in relation to the draft Devonport Local Provisions Schedule (LPS). Please accept this as Tasmania Fire Service's representation on this matter.

This representation relates to two elements of the draft LPS:

1. The Bushfire-Prone Areas Overlay; and
2. DEV-S3.0 Devonport Reserved Residential Land Specific Area Plan.

### **Bushfire-Prone Areas Overlay**

The draft Bushfire-Prone Areas Overlay was produced by Tasmania Fire Service in collaboration with Devonport City Council.

The data used in the exhibited version of the draft Bushfire-Prone Areas Overlay was produced in March 2019. Since then, there have been some new developments that have proceeded and Tasmania Fire Service has received further advice on the management of some specific sites.

Tasmania Fire Service and Council's Project Officer have agreed that some minor refinements to the overlay are appropriate to avoid unnecessarily including properties that could now be mapped-out. It is therefore recommended that the overlay be modified prior to final approval. The enclosed maps show the advertised draft overlay and the proposed refined boundaries.

A summary of the proposed updates is provided in Table 1. The proposed updates would remove total of 146 residential lots from the draft overlay.





**Table 1 – Proposed updated to bushfire-prone areas overlay**

|                |   |
|----------------|---|
| Maps 1, 3,     | Five residential lots are proposed to be removed from draft overlay. These lots achieve 100m (BAL-LOW) separation from the nearest bushland and were therefore incorrectly mapped as bushfire-prone. Removing these lots will remove this inconsistency.  |
| Maps 1, 4,     | A residential subdivision at 101A Brooke Street, East Devonport has now been partially constructed, removing an area of unmanaged Grassland fuels. This development, combined with the existing dwelling at 9A Tandara Place to the north, reduces exposure of a number of lots along the eastern edge of the existing urban area.  |
| Maps 1, 6      | <p>A 1.8ha site at 80-100 Brooke Street, East Devonport has been developed with a 40-cabin workers accommodation facility, effectively in-filling a previous gap in development along this street and reducing risk to surrounding properties.</p> <p>Land at 103 John Street, East Devonport has been developed with extensive polytunnels that are used for agricultural production. When exposed to fire, these structures will melt (as opposed to undergoing flaming combustion). These types of structures are used to grow irrigated crops and subsequently contain minimal fuel. Land surrounding these structures is considered to be adequately managed. The site and adjacent residential lots are subsequently proposed to be removed from the draft overlay.</p> |
| Maps 1, 5      | <p>A narrow strip of riparian vegetation exists on Council land at 46 Laphorne Close, Don. The fuel is approximately 20m in width and is contiguous with larger areas of fuel to the north, hence adjacent lots were originally included within the draft overlay.</p> <p>Council has subsequently confirmed that it manages firebreaks on either side of the reserve to protect adjoining properties. TFS is satisfied that the residual risk to surrounding properties is sufficiently low to not require a planning or built response.</p>   |
| Map 1, 2, 8, 9 | <p>A residential subdivision at 35 Fleetwood Drive, Spreyton has now been partially constructed, removing an area of unmanaged Grassland fuels. This consequently reduces exposure of a number of adjoining existing residential lots.</p> <p>The extent to which the overlay applies to the Devonport Golf Course at 66 Woodrising Avenue, Spreyton has been reviewed and updated to exclude an area of saltmarsh/wetland.</p>   |

Importantly, the proposed updates will only remove properties from the overlay - it is not proposed to include any additional properties within the overlay that were not shown as 'bushfire-prone' on the exhibited Devonport LPS maps. The proposed updates will therefore not cause detriment to any person and it is likely unnecessary to re-exhibit the LPS on account of these updates alone.

In our view, it is in the community's interest to adopt the proposed refinements as part of the LPS process. Notwithstanding this, an alternate option would be to initiate a draft amendment to the Devonport LPS once the Tasmanian Planning Scheme had been enacted.



## **DEV-S3.0 Devonport Reserved Residential Land SAP**

The Devonport Reserved Residential Land SAP seeks to guide future residential growth in Quoiba and Miandetta. The SAP area is also mapped within the draft Bushfire-Prone Areas Overlay.

Clause 5.3.1 of the State Planning Provisions states that a specific area plan may be in addition to, may modify or substitute a use or development standard in a zone or code.

Clause DEV-S3.2.2 states that the SAP applies in addition to the General Residential Zone and Natural Assets Code. Presumably this is so that the SAP requirements do not override the subdivision requirements of those parts of the scheme, to the extent of any inconsistency. The clause is silent with respect to the Bushfire-Prone Areas Code.

DEV-S3.8.2 Subdivision applies in addition to the subdivision requirements of the General Residential Zone and Natural Assets Code. The clause is silent with respect to the Bushfire-Prone Areas Code. The clause objective is to provide for efficient use of land whilst also minimising impact on natural values.

There is naturally some tension between lot yield, the retention of natural values and bushfire protection. Notwithstanding this, there is no strategic merit in compromising minimum bushfire safety requirements to improve lot yield and it is important that the Bushfire-Prone Areas Code be applied to any future subdivision of this land.

Tasmania Fire Service recommends that the SAP be amended to provide certainty with that it applies in addition to the Bushfire-Prone Areas Code by amending the abovementioned clauses as follows:

### **DEV-S3.2 Application of this Plan**

DEV-S3.2.1 The specific area plan applies to the area of land designated as Devonport Reserved Residential Land Specific Area Plan on the overlay maps.

DEV-S3.2.2 In the area of land to this plan applies to, the provisions of the specific area plan are in addition to the provisions of:  
(a) General Residential Zone; and  
(b) Natural Assets Code, [and](#)  
(c) [Bushfire-Prone Areas Code](#),

as specified in the relevant provision.

...

### **DEV-S3.8.1 Subdivision**

This clause is in addition to the General Residential Zone – clause 8.6 Development Standards for Subdivision, ~~and in addition to~~ Natural Assets Code – clause C7.7.2 Subdivision within a priority vegetation area [and Bushfire-Prone Areas Code – clause C13.6](#).



If Tasmania Fire Service can provide any clarification or further information in relation to this submission, please contact me at [tom.oconnor@fire.tas.gov.au](mailto:tom.oconnor@fire.tas.gov.au).

Yours faithfully,

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

Tom O'Connor  
**PLANNING & ASSESSMENT OFFICER**

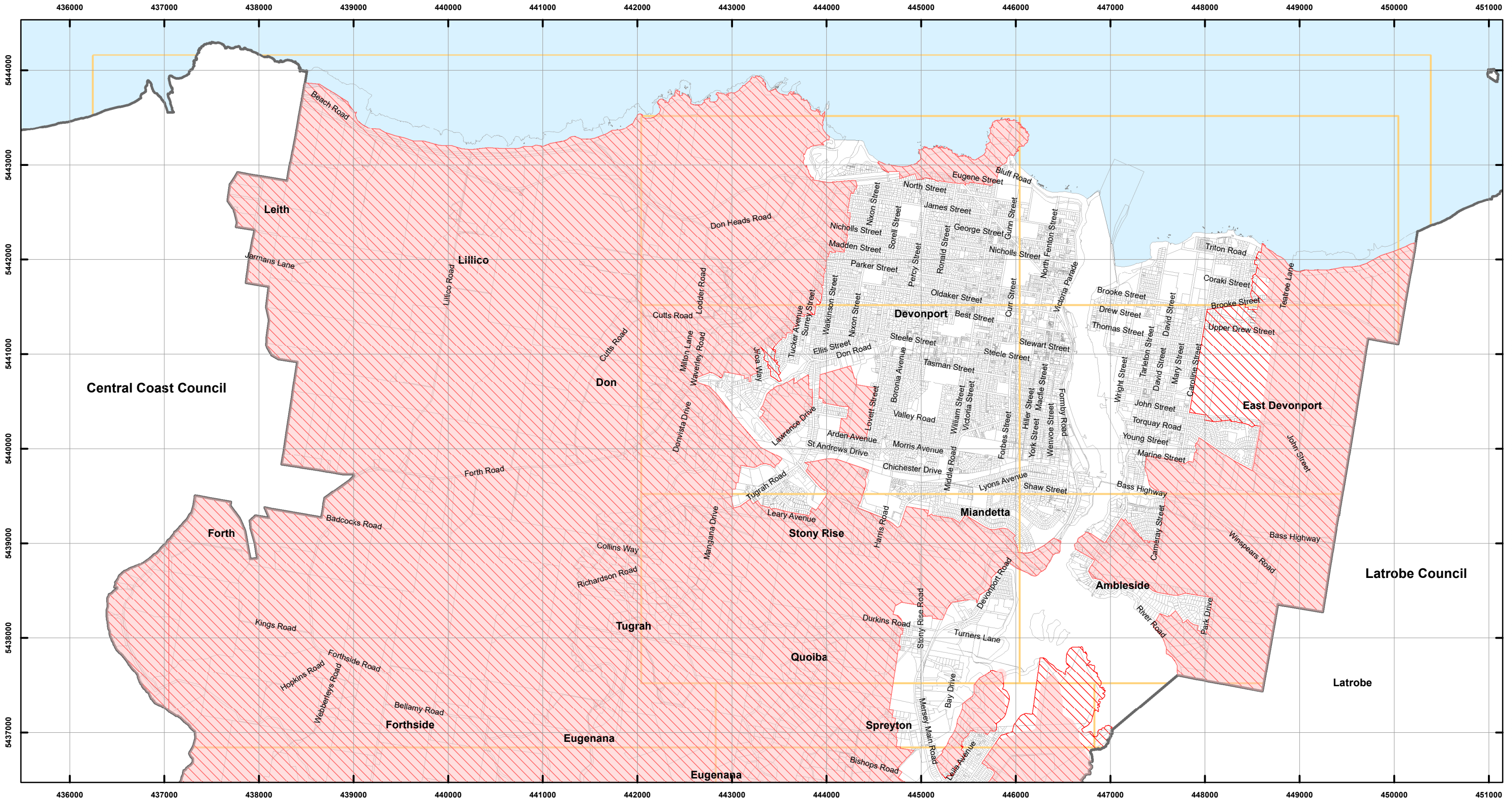
12 June 2020

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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule:

## Bushfire-Prone Areas Overlay



Legend

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

Map 1 of 10

0

370

740

1,110

1,480

1,850

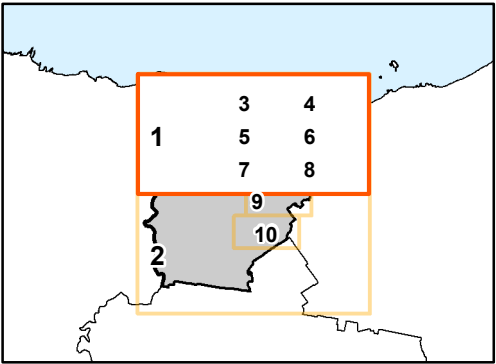
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Overlay data from Devonport Council and Tasmania Fire Service

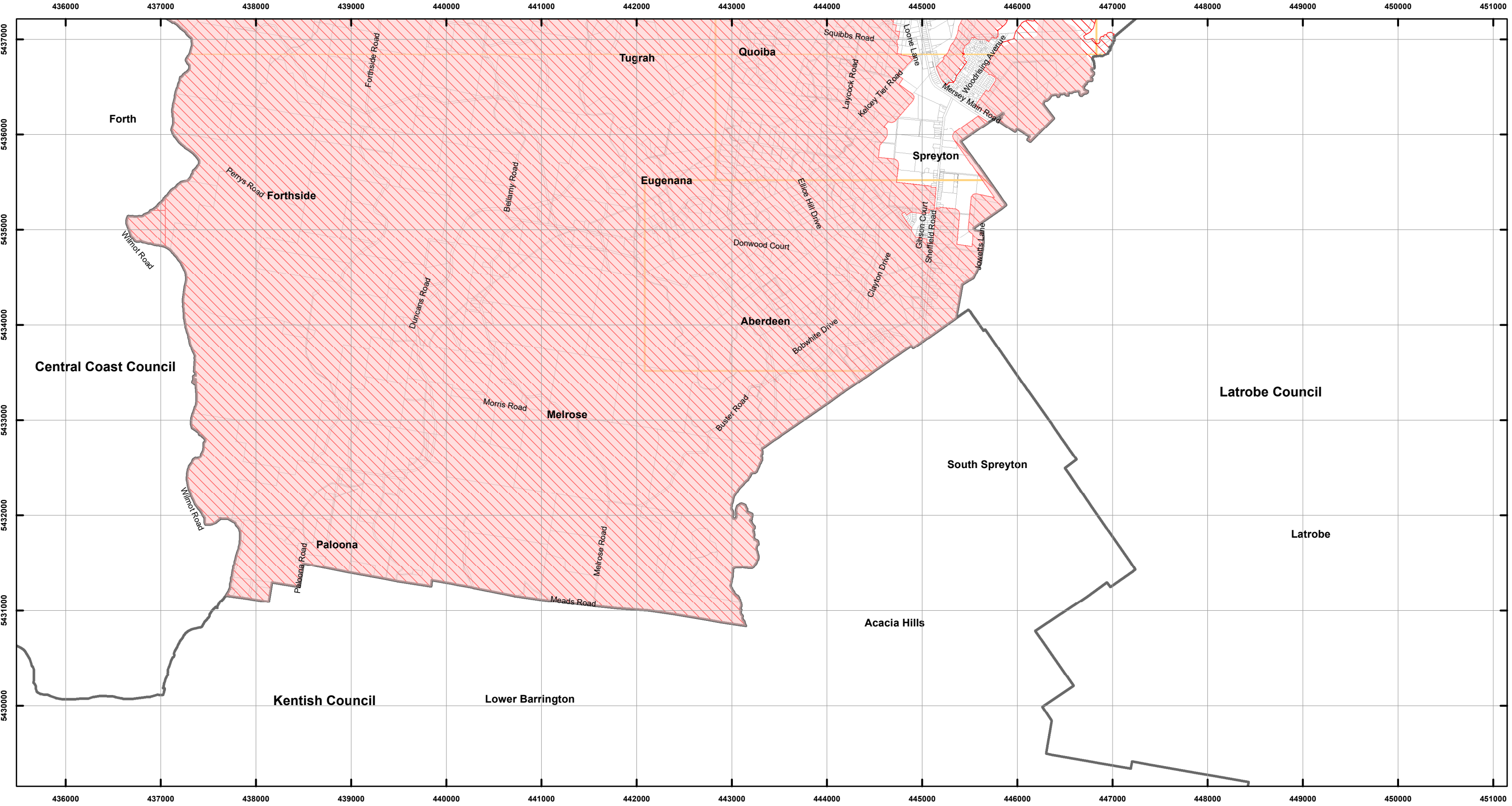
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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule: Bushfire-Prone Areas Overlay



**Legend**

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

**Map 2 of 10**

03707401,1101,4801,850

Metres

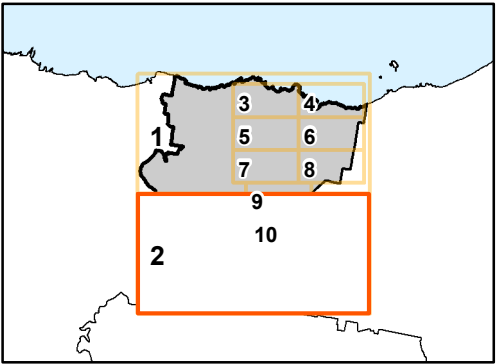
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Overlay data from Devonport Council and Tasmania Fire Service  
Base topographic data from the LIST © State of Tasmania

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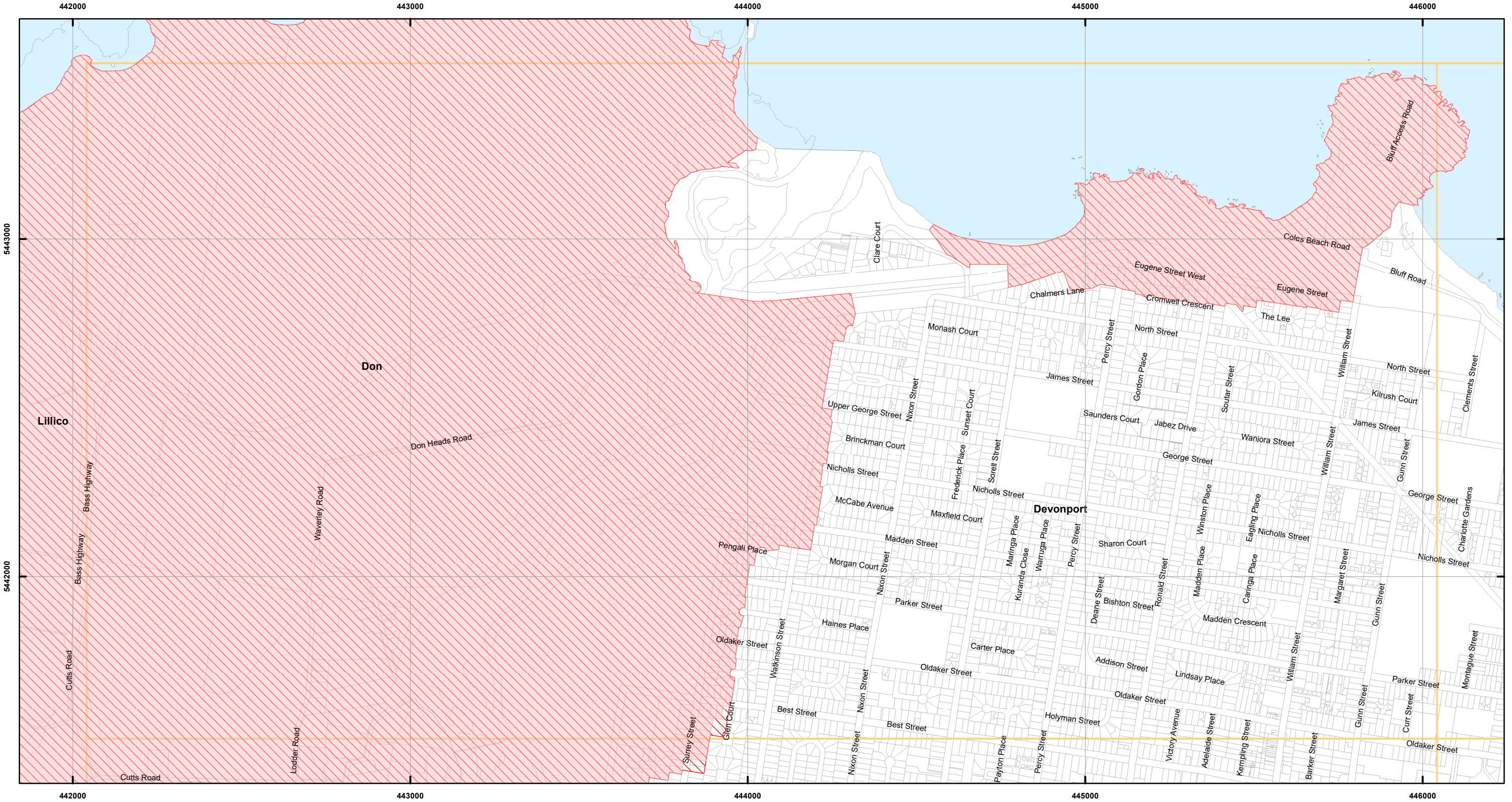
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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule:

## Bushfire-Prone Areas Overlay



**Legend**

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

Map 3 of 10

0100200300400500

Metres

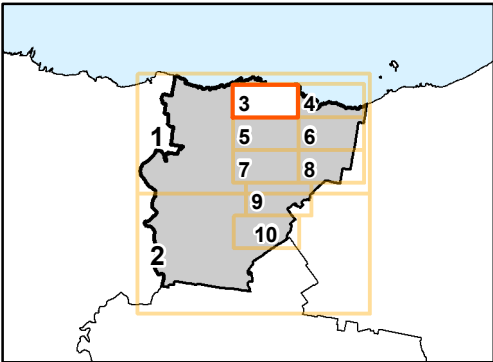
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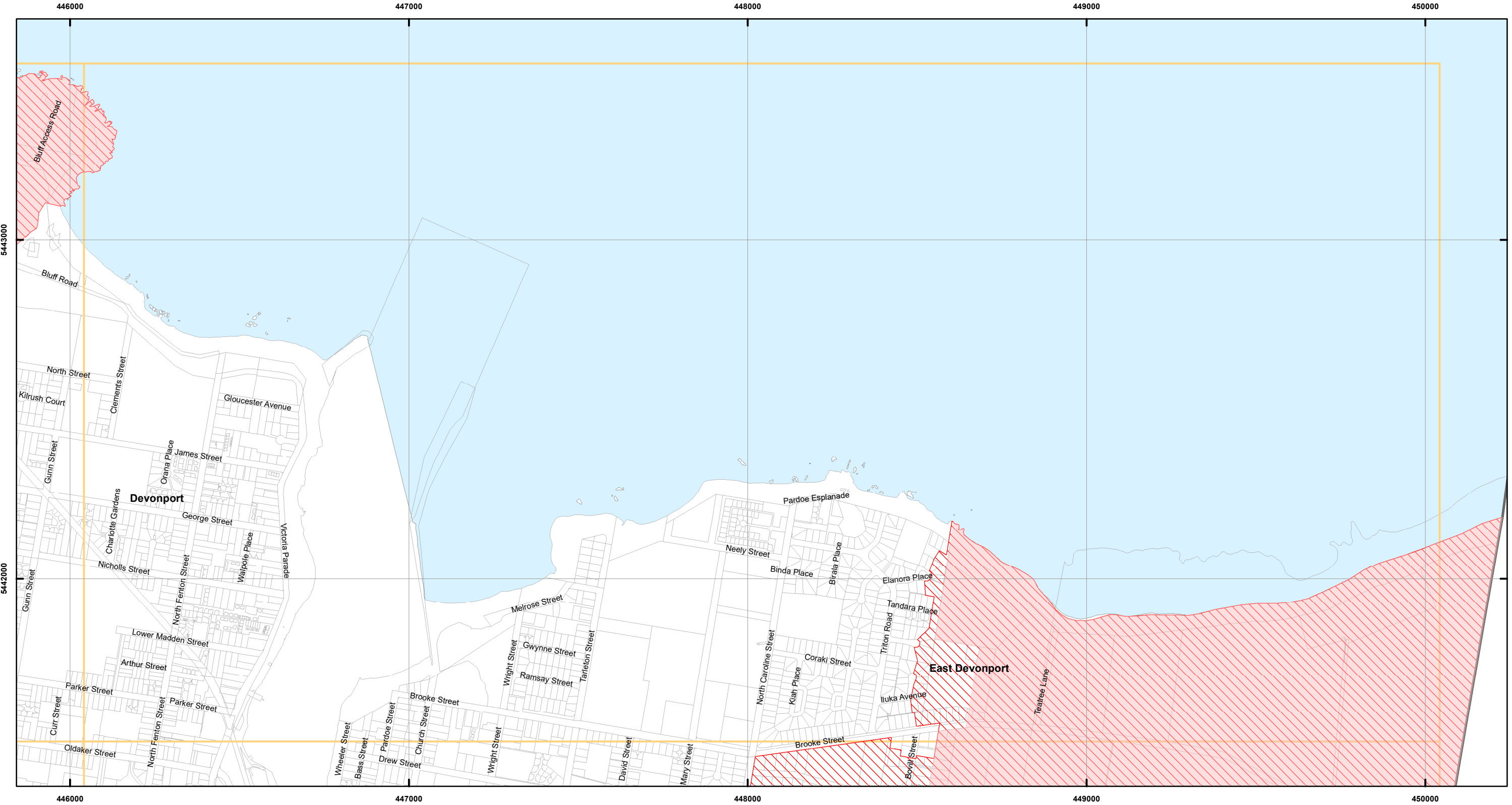
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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule: Bushfire-Prone Areas Overlay



**Legend**

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

**Map 4 of 10**

0

100

200

300

400

500

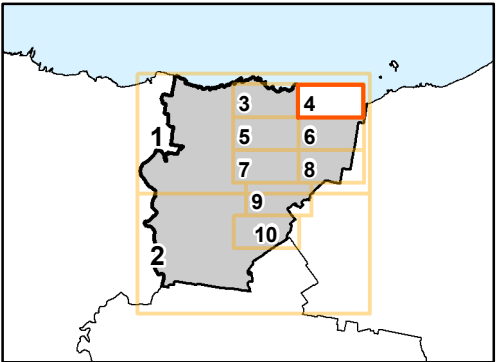
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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule:

## Bushfire-Prone Areas Overlay



**Legend**

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

**Map 5 of 10**

0100200300400500

Metres

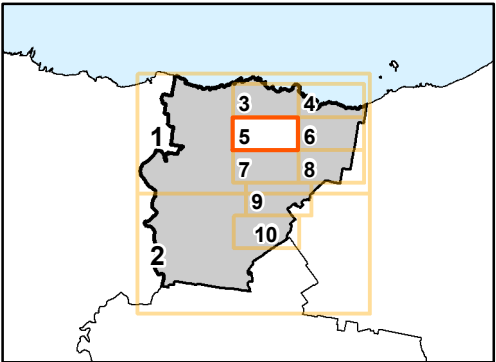
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Overlay data from Devonport Council and Tasmania Fire Service

Base topographic data from the LIST © State of Tasmania

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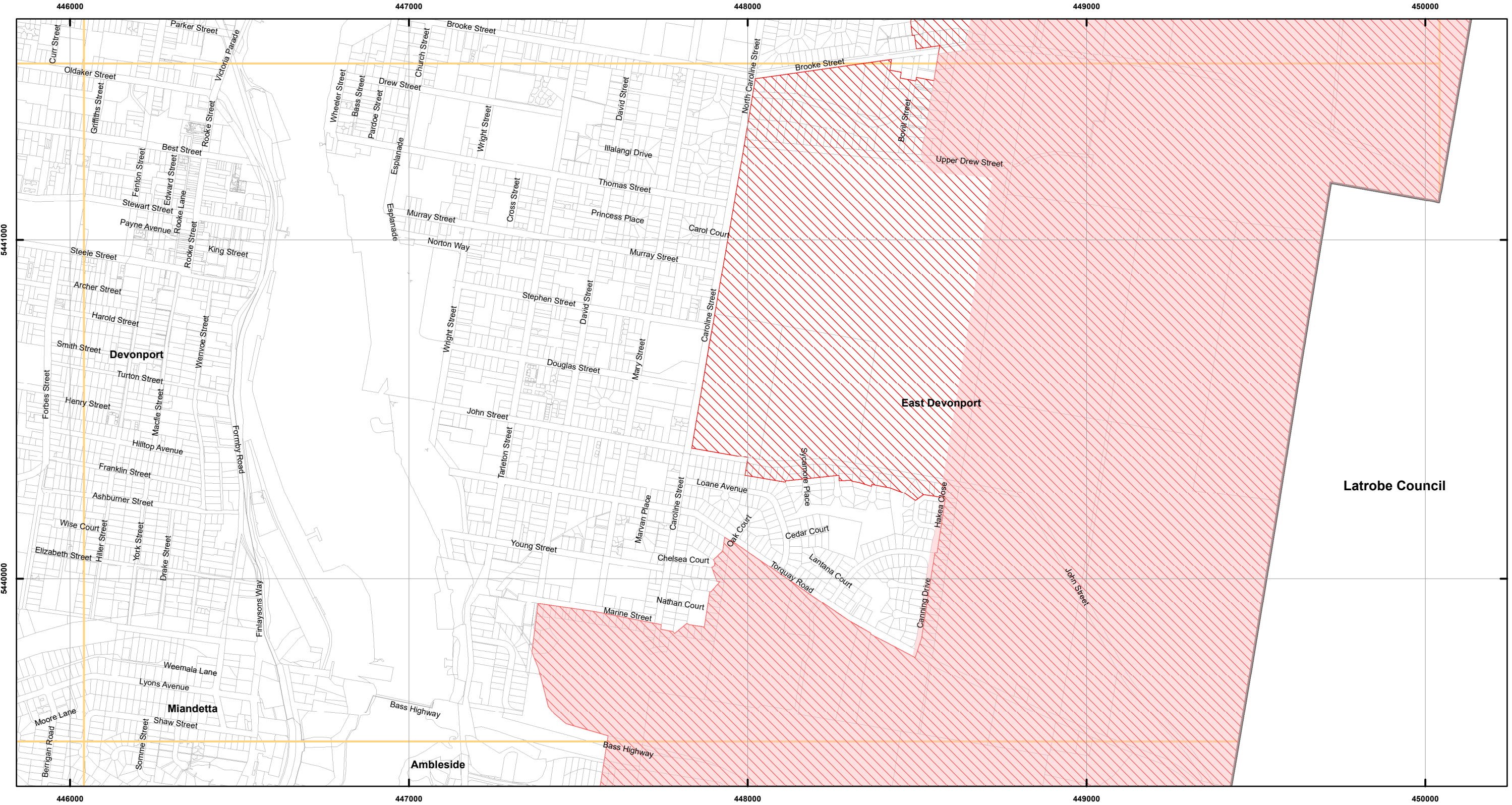
N





# Tasmanian Planning Scheme - Devonport Local Provisions Schedule:

## Bushfire-Prone Areas Overlay



Legend

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

Map 6 of 10

0100200300400500

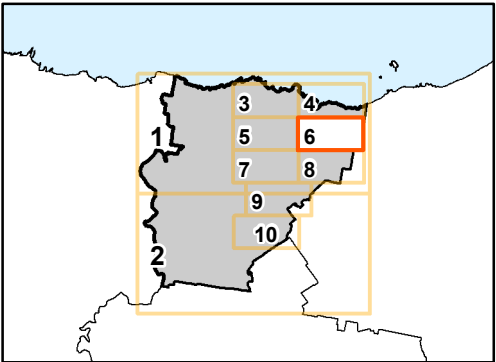
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Base topographic data from the LIST © State of Tasmania

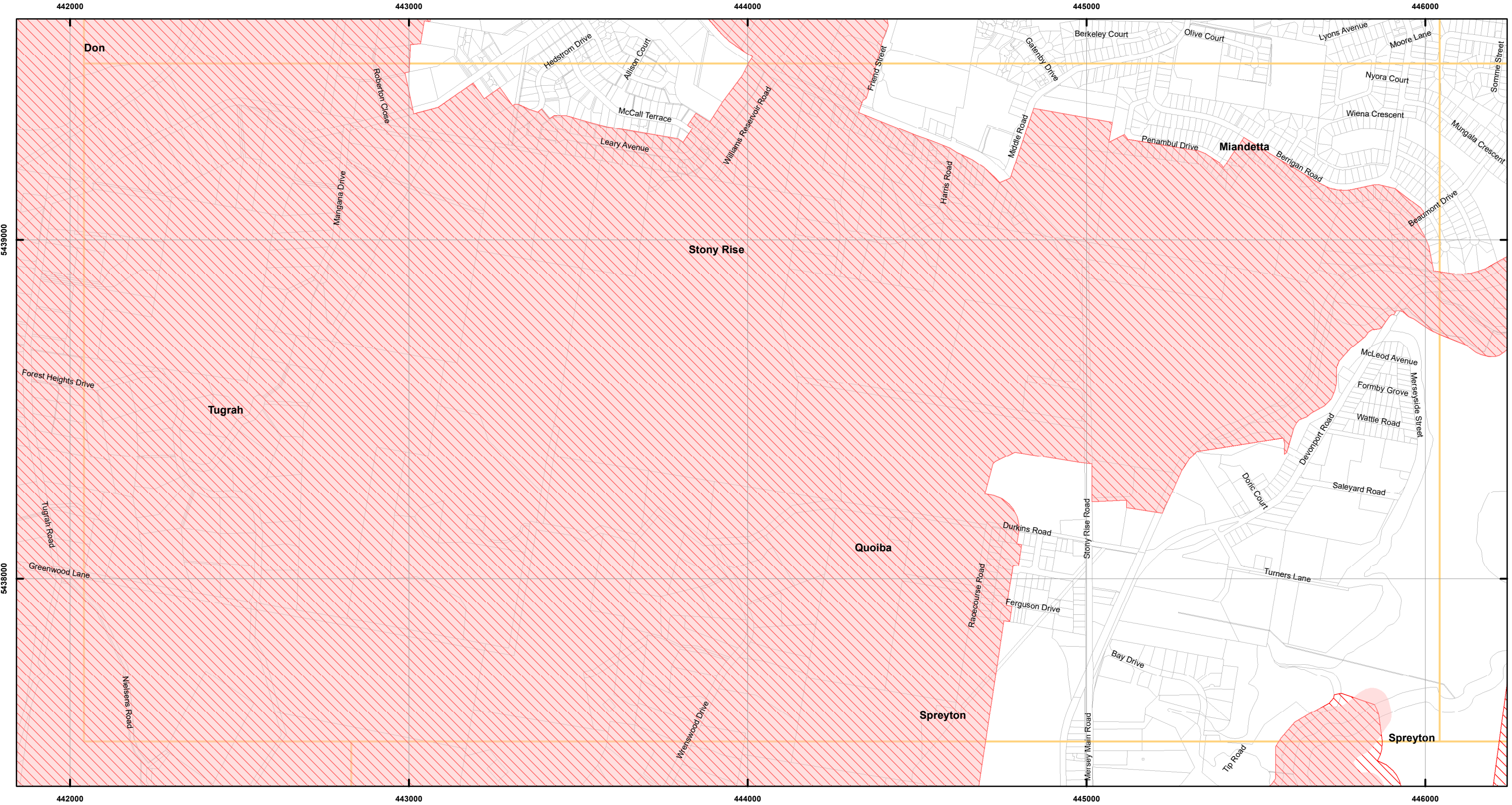
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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule:

## Bushfire-Prone Areas Overlay



**Legend**

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

**Map 7 of 10**

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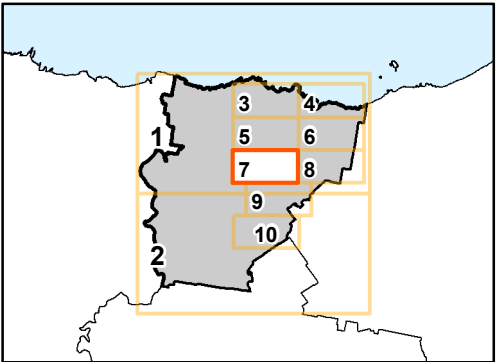
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Overlay data from Devonport Council and Tasmania Fire Service

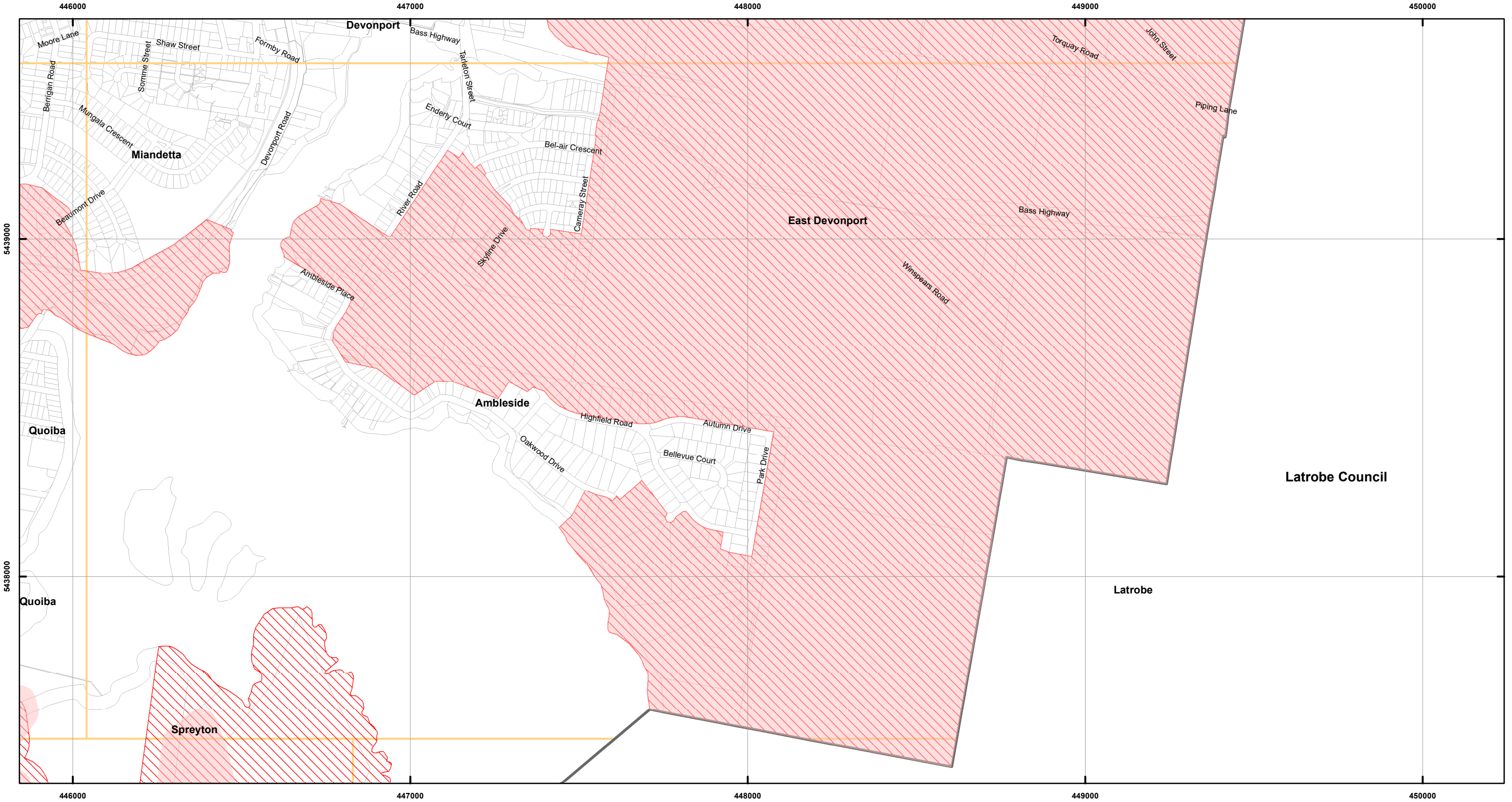
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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule: Bushfire-Prone Areas Overlay



**Legend**

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

**Map 8 of 10**

0100200300400500

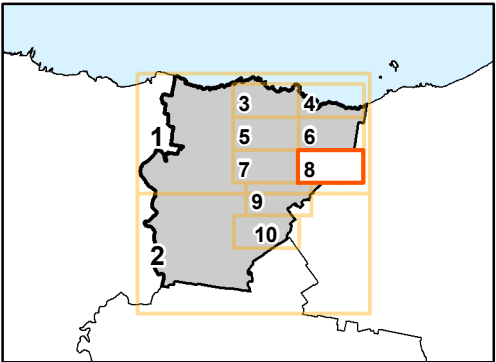
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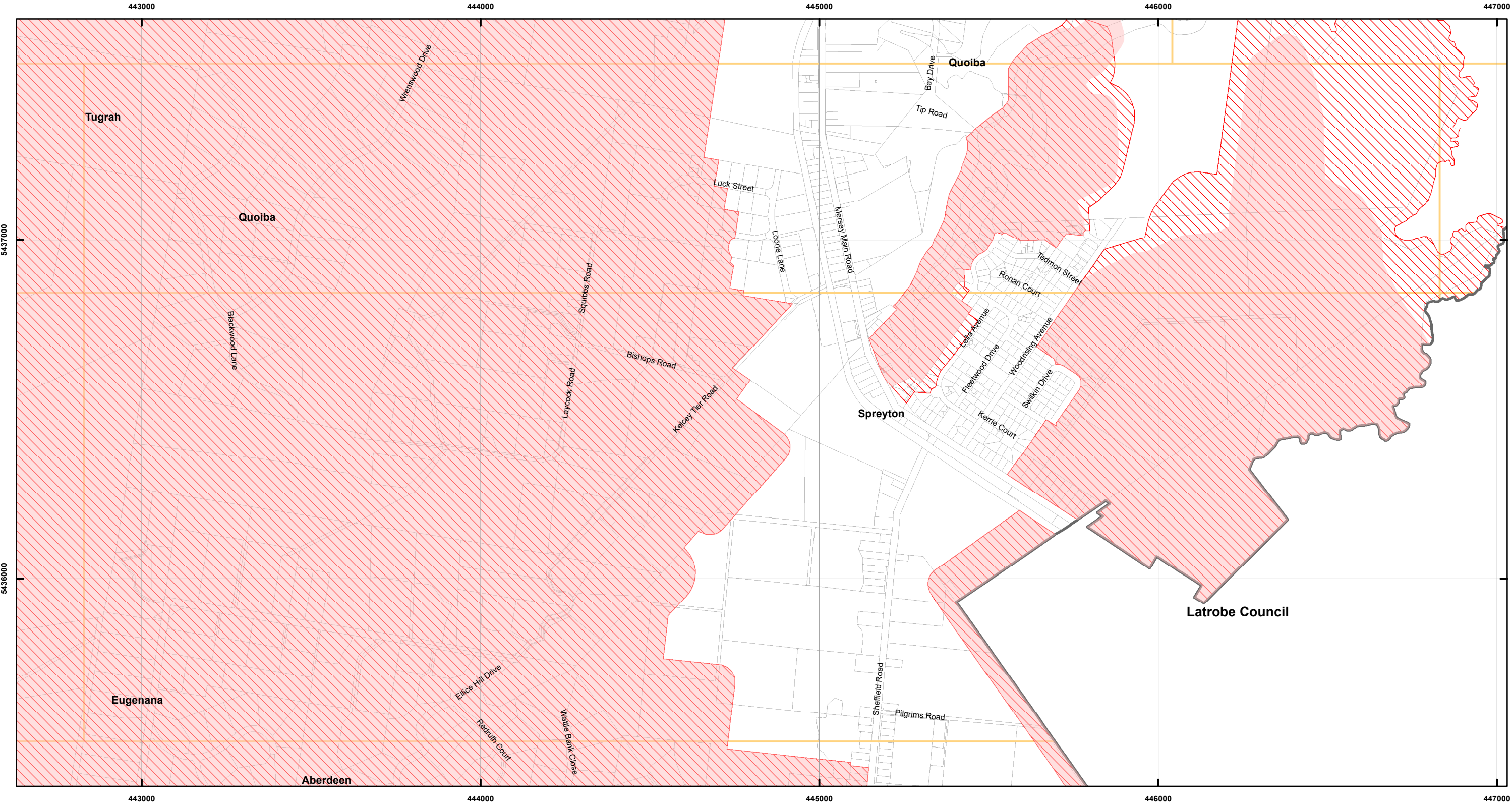
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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule: Bushfire-Prone Areas Overlay



**Legend**

Bushfire Prone Areas - proposed updated overlay

Bushfire Prone Area - exhibited draft overlay

Parcels

**Map 9 of 10**

0100200300400500

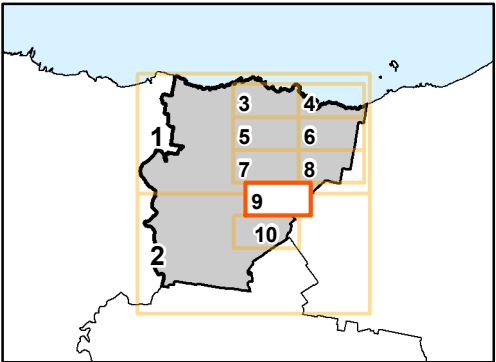
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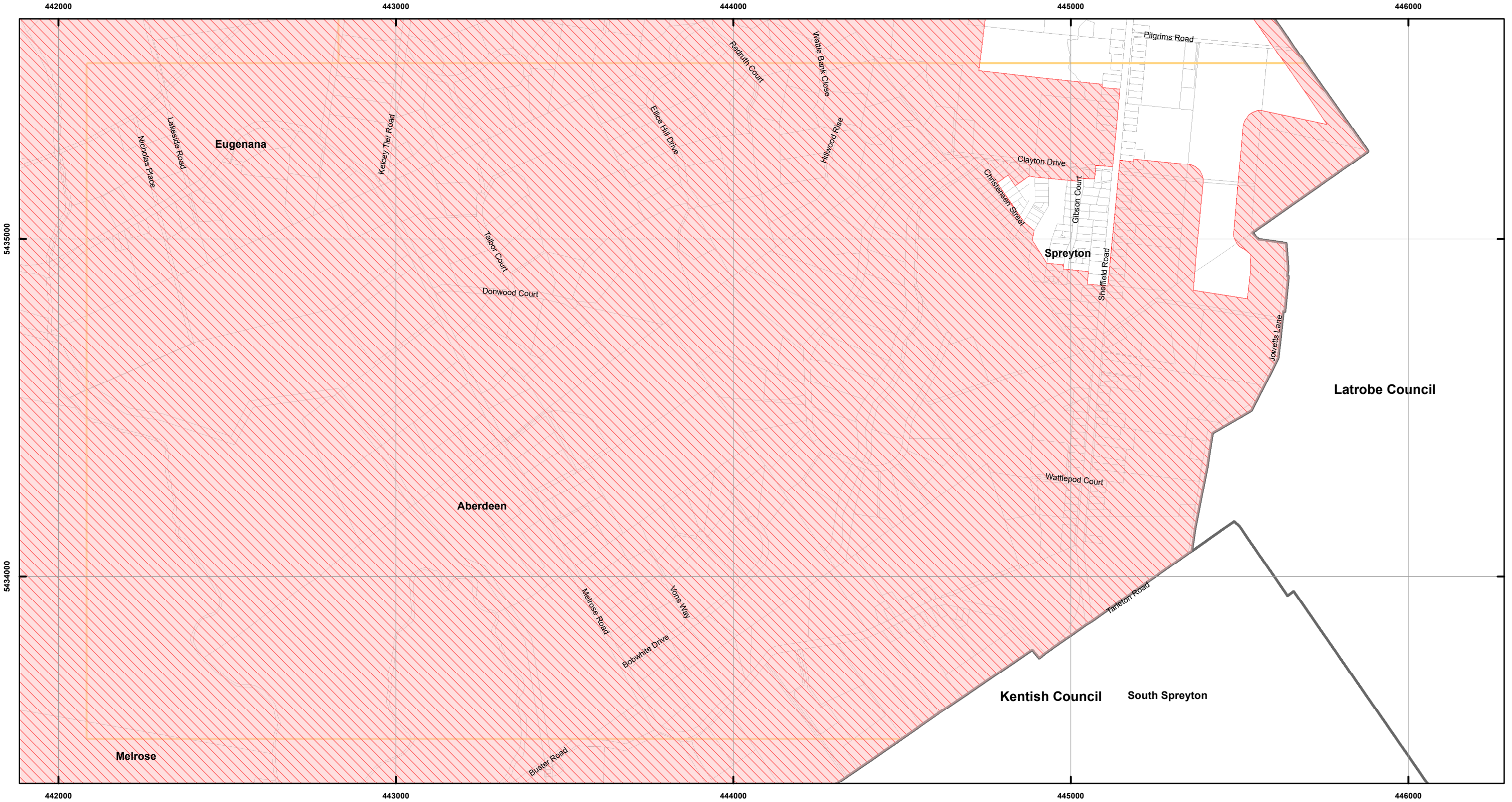
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# Tasmanian Planning Scheme - Devonport Local Provisions Schedule: Bushfire-Prone Areas Overlay



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Bushfire Prone Area - exhibited draft overlay

Parcels

**Map 10 of 10**

0100200300400500

Metres

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