

From: "Indra Boss" <iboss@ccc.tas.gov.au>
Sent: Mon, 20 Mar 2023 09:37:37 +1100
To: "City Planning" <cityplanning@ccc.tas.gov.au>
Subject: FW: PDPSPAMEND-2021/019004 - COMBINED DRAFT PLANNING SCHEME AND DEVELOPMENT APPLICATION - 30 Holland Court, Howrah
Categories: Kylie

Please register this as a representation – thanks, Indra



Indra Boss

Strategic Planner | Clarence City Council

a 38 Bligh Street | PO Box 96 Rosny Park TAS 7018

p 03 6217 9566

e iboss@ccc.tas.gov.au | **w** www.ccc.tas.gov.au

From: Bushfire Practitioner <bfpr@fire.tas.gov.au>
Sent: Friday, 17 March 2023 10:51 AM
To: Indra Boss <iboss@ccc.tas.gov.au>
Cc: Bushfire Practitioner <bfpr@fire.tas.gov.au>
Subject: PDPSPAMEND-2021/019004 - COMBINED DRAFT PLANNING SCHEME AND DEVELOPMENT APPLICATION - 30 Holland Court, Howrah

This Message Is From an External Sender

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Dear Indra,

Tasmania Fire Service was reviewing advertised subdivision applications this week and noticed the combined Draft Planning Scheme Amendment and Development Application (PDPSPAMEND-2021/019004 - 30 Holland Court, Howrah) has been advertised without the accompanying certified bushfire documentation.

The subject site is within a 'bushfire-prone area', as defined by the Scheme. The application must therefore be supported by a certified bushfire hazard management plan or a certified exemption in order to satisfy the requirements of E1.0 Bushfire-Prone Areas Code.

Could Council please confirm whether certified bushfire documentation was submitted with the application? If so, could a copy please be emailed to bfpr@fire.tas.gov.au.

Kind regards

Suzie Gifford

**Planning & Assessment Officer
Bushfire Risk Unit**

Tasmania Fire Service

Service | Professionalism | Integrity | Consideration

Cnr Argyle and Melville Streets | GPO Box 308 Hobart Tasmania 7001

Phone (03) 6166 5600 | Mobile 0460 016 178

suzanne.gifford@fire.tas.gov.au | www.fire.tas.gov.au

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From: "Indra Boss"
Sent: Mon, 20 Mar 2023 10:32:57 +1100
To: "Bushfire Practitioner" <bfp@fire.tas.gov.au>
Subject: Tas Fire Service - Interim Response RE: PDPSPAMEND-2021/019004 - COMBINED DRAFT PLANNING SCHEME AND DEVELOPMENT APPLICATION - 30 Holland Court, Howrah

Dear Suzie – thank you for your e-mail. I came to this application after it had gone to the council meeting for approval.

We did receive a BHMP with the application which shows a Bushfire setback of 23m to achieve BAL 19 in the south east corner of proposed Lot 7 . The assessment in the Planning Report (pages 30 to 31) stated that the proposal complies with Acceptable Solution A1 of both *C13.6.1 Provision of Hazard Management Areas* and *C13.6.2 Public and firefighting access*.

Both of these documents are included in the advertised application information. The report refers to certified documentation, but on review of the information submitted to council – I have not been able to sight such.

It is not clear whether the BHMP includes such information.

If this information is not sufficient, please submit a representation to Council by 30 March 23, for inclusion in the s 40K report I'll be preparing.

Kind regards, Indra



Indra Boss

Strategic Planner | Clarence City Council

a 38 Bligh Street | PO Box 96 Rosny Park TAS 7018

p 03 6217 9566

e iboss@ccc.tas.gov.au | **w** www.ccc.tas.gov.au

From: Bushfire Practitioner <bfp@fire.tas.gov.au>
Sent: Friday, 17 March 2023 10:51 AM
To: Indra Boss <iboss@ccc.tas.gov.au>
Cc: Bushfire Practitioner <bfp@fire.tas.gov.au>
Subject: PDPSPAMEND-2021/019004 - COMBINED DRAFT PLANNING SCHEME AND DEVELOPMENT APPLICATION - 30 Holland Court, Howrah

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Dear Indra,

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The subject site is within a 'bushfire-prone area', as defined by the Scheme. The application must therefore be supported by a certified bushfire hazard management plan or a certified exemption in order to satisfy the requirements of E1.0 Bushfire-Prone Areas Code.

Could Council please confirm whether certified bushfire documentation was submitted with the application? If so, could a copy please be emailed to bfp@fire.tas.gov.au.

Kind regards

Suzie Gifford
Planning & Assessment Officer
Bushfire Risk Unit

Tasmania Fire Service
Service | Professionalism | Integrity | Consideration

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suzanne.gifford@fire.tas.gov.au | www.fire.tas.gov.au

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From: "Bushfire Practitioner" <bfp@fire.tas.gov.au>
Sent: Thu, 30 Mar 2023 17:33:05 +1100
To: "City Planning" <cityplanning@ccc.tas.gov.au>
Cc: "Bushfire Practitioner" <bfp@fire.tas.gov.au>
Subject: PDPSPAMEND-2021/019004 - 30 HOLLAND COURT, HOWRAH - TFS representation
Attachments: PDPSPAMEND-2021019004 - 30 Holland Court Howrah.pdf
Categories: Bec

Attention: General Manager

Dear Sir / Madam,

Please find attached a representation from the Tasmania Fire Service for the application PDPSPAMEND-2021/019004 - 30 Holland Court, Howrah - Proposed subdivision currently on advertising.

Kind regards

Suzie Gifford

**Planning & Assessment Officer
Bushfire Risk Unit**

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Tasmania Fire Service

Bushfire Risk Unit

File No: AD3698

General Manager
Clarence City Council
clarence@ccc.tas.gov.au

Attn: Planning

Dear Sir/Madam,

**COMBINED DRAFT PLANNING SCHEME AND DEVELOPMENT APPLICATION
PDPSPAMEND-2021/019004 - 30 HOLLAND COURT, HOWRAH**

I write in relation to the abovementioned development application that is currently on public exhibition. Please consider this submission as a representation on behalf of the Tasmania Fire Service.

The application seeks to amend the Clarence Local Provision Schedule (LPS) by rezoning the subject site from Community Purpose Zone to General Residential Zone, Open Space Zone and Utilities Zone, and undertake a 7-lot subdivision.

The proposed subdivision involves land within a designated 'bushfire-prone area' (as defined in clause C13.3.1). Clause C13.2.1 specifies that section C13.0 Bushfire-Prone Areas Code applies to the subdivision of land within a 'bushfire-prone area'.

To satisfy the Bushfire-Prone Areas Code, the application must be supported by one of the following:

- Certification from an accredited person that the proposal involves an insufficient increase in risk, in which case the application would be exempted under clause C13.4.1(a) from further consideration under the Code; or
- A bushfire hazard management plan that demonstrates compliance with the development standards of clause C13.6 and is certified by an accredited person.

It is understood that the application includes neither a certified exemption nor a certified bushfire hazard management plan. Therefore, the application does not meet the exemption criteria under C13.4.1 and does not satisfy the development standards of clause C13.6.

The Planning Scheme does not provide the planning authority with discretion to waive the requirement for the applicant to provide one of the above.

State Headquarters Cnr Argyle and Melville Streets | GPO Box 1526 Hobart Tasmania 7001 | Phone (03) 6173 2740
Southern Region 1040 Cambridge Road, Cambridge Tasmania 7170 | Phone (03) 6166 5500
Northern Region 339 Hobart Road Youngtown Tasmania 7249 | Phone (03) 6777 3666 | Fax (03) 6345 5860
North West Region 15 Three Mile Line | PO Box 1015 Burnie Tasmania 7320 | Phone (03) 6477 7250 Fax (03) 6433 1551

www.fire.tas.gov.au

The Planning Report by JMG dated December 2022 refers to a Bushfire Hazard Management Plan, which is provided as Appendix D. The plan is not compliant with the *Chief Officer's Approved Form for a Bushfire Hazard Management Plan*, is not supported by a compliant bushfire hazard report and is not certified by an accredited person. The plan contains a range of technical deficiencies including:

- Failure to provide BAL-19 building areas for all lots in the subdivision;
- Provision for BAL-29 buildings on Lot 7;
- No specifications for hazard management areas;
- No specifications for access design;
- No specifications for firefighting water supplies.
- Non-compliant cul-de-sac head dimensions.

The planning report (p.30) incorrectly states that the plan has been certified by an accredited person, in response to clause C13.6.1. Further, the report (p.31) incorrectly state that the subdivision has been exempted from the access requirements of clause C13.6.2 and is silent with respect to water supply requirements of clause C13.6.3.

Consequently, the application fails to comply with section C13.0 of the Tasmanian Planning Scheme. It is likely the subdivision layout will require modifications to achieve Code compliance. It is TFS's view that the application should not have been exhibited without a certified bushfire hazard management plan and should not be approved in its current form.

If you would like to discuss this matter further, please contact me on 0460 016 178 or at bfp@fire.tas.gov.au.

Yours sincerely,



Suzie Gifford
PLANNING & ASSESSMENT OFFICER
30 March 2023

Cc iboss@ccc.tas.gov.au

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From: "Bushfire Practitioner" <bfp@fire.tas.gov.au>
Sent: Mon, 8 May 2023 14:40:06 +1000
To: "City Planning" <cityplanning@ccc.tas.gov.au>
Cc: "Bushfire Practitioner" <bfp@fire.tas.gov.au>
Subject: RE: PDPSPAMEND-2021-019004 - 30 Holland Court, Howrah

Hello Indra,

Thank you for informing us of the extended timeframe for this application.

We have reviewed the readvertised documentation. It would appear that a Bushfire Hazard Assessment certified by an accredited person has not yet been provided.

The TFS sustains the view that if no certified Bushfire Hazard Assessment is provided, Code C13.0 of the Scheme is not satisfied and the application should be considered incomplete.

Please let me know if I have misinterpreted the readvertised documentation or if you would like to discuss.

Kind regards

Suzie Gifford

Planning & Assessment Officer
Bushfire Risk Unit

Tasmania Fire Service

Service | Professionalism | Integrity | Consideration

Cnr Argyle and Melville Streets | GPO Box 308 Hobart Tasmania 7001
Phone (03) 6166 5600 | Mobile 0460 016 178
suzanne.gifford@fire.tas.gov.au | www.fire.tas.gov.au

From: City Planning <cityplanning@ccc.tas.gov.au>
Sent: Friday, May 5, 2023 1:21 PM
To: Bushfire Practitioner <bfp@fire.tas.gov.au>
Subject: PDPSPAMEND-2021-019004 - 30 Holland Court, Howrah

Please see attached correspondence.

Kind Regards
Rebecca



Rebecca Anning

Planning Administration Officer | Clarence City Council

a 38 Bligh Street | PO Box 96 Rosny Park TAS 7018

p 03 6217 9564

e ranning@ccc.tas.gov.au | **w** www.ccc.tas.gov.au

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From: "Indra Boss"
Sent: Tue, 9 May 2023 08:53:22 +1000
To: "Bushfire Practitioner" <bfpr@fire.tas.gov.au>
Subject: Acknowledging TFS - RE: PDPSPAMEND-2021-019004 - 30 Holland Court, Howrah - 9 May 2023

Hi Suzie – thank you for the further e-mail. I have flagged the need for such a report with the applicant, who advised that they will provide appropriate documentation as soon as possible.

Kind regards, Indra



Indra Boss

Strategic Planner | Clarence City Council

a 38 Bligh Street | PO Box 96 Rosny Park TAS 7018

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e iboss@ccc.tas.gov.au | **w** www.ccc.tas.gov.au

From: Bushfire Practitioner <bfpr@fire.tas.gov.au>
Sent: Monday, 8 May 2023 2:40 PM
To: City Planning <cityplanning@ccc.tas.gov.au>
Cc: Bushfire Practitioner <bfpr@fire.tas.gov.au>
Subject: RE: PDPSPAMEND-2021-019004 - 30 Holland Court, Howrah

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Please let me know if I have misinterpreted the readvertised documentation or if you would like to discuss.

Kind regards

Suzie Gifford

Planning & Assessment Officer

Bushfire Risk Unit

Tasmania Fire Service

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To: Bushfire Practitioner <bfp@fire.tas.gov.au>

Subject: PDPSPAMEND-2021-019004 - 30 Holland Court, Howrah

Please see attached correspondence.

Kind Regards

Rebecca



Rebecca Anning

Planning

Administration Officer

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