



Tasmania Fire Service

File: A18/225424
Officer: CC

Martin Gill
General Manager
Meander Valley Council
planning@meander.tas.gov.au

Dear Martin,

MEANDER VALLEY LOCAL PROVISIONS SCHEDULE (LPS-MEA-TPS)

I write in response to the Meander Valley Local Provisions Schedule ('LPS') that is currently on public exhibition. Please accept this submission as the Tasmania Fire Service (TFS) representation on this matter.

TFS supports the proposed Specific Area Plans ('SAP') and Particular Purpose Zone ('PPZ') that form the Meander Valley LPS. With the exception of the Birralelee Road Industrial Precinct SAP, future subdivision within the SAPs and PPZ will be required to comply with the Bushfire-Prone Areas Code.

Birralelee Road Industrial Precinct

It is recognised that the Birralelee Road Industrial Precinct is an important initiative intended to serve the industrial land requirements of the local and broader regional economy. In addition to other Council incentives, ensuring that land within the precinct is available and ready for industrial use and development is important in order to attract future investment.

Ordinarily, TFS would not be supportive of local provisions that sought to override the Bushfire-Prone Areas Code, however in this case we are satisfied that suitable provision for bushfire protection has been made.

The bushfire-prone areas overlay applies a 50m buffer around the perimeter of the precinct. Limiting the overlay to a 50m strip from adjoining grassland fuels is consistent with the minimum distance for a BAL-LOW rating under Australian Standard 3959-2018. This means that the hazard exposure likely to be experienced at a location that is over 50m from the surrounding grassland does not warrant a built response.

The precinct will likely develop in stages over many years, meaning land within the precinct has the potential to remain as unmanaged grassland until such time as the entire precinct is developed. Given this scenario, it would initially seem logical to map



all undeveloped land within the precinct as bushfire-prone. However, through consultation with Meander Valley Council, it has been agreed to restrict the overlay to the perimeter of the precinct on the basis that Council has committed to ensure that grassland fuels on undeveloped land within the precinct will be continuously managed in a 'low fuel state' until such time as the entire precinct is developed and the hazard permanently removed.

At a minimum, this requires monitoring the land within the precinct and use of hazard abatement powers under s.200 of the *Local Government Act 1993* to ensure that Grassland fuels are managed to a maximum height of 100mm between October and March annually. Failure to fulfil this commitment may result in use and development within the precinct being exposed to unacceptable bushfire risk.

Clause MEA-S1.8.3 provides subdivision requirements for land within a bushfire-prone area (i.e. around the perimeter of the precinct) and overrides the subdivision requirements of the Bushfire-Prone Areas Code. The draft clause reads as follows:

MEA-S1.8.3 Subdivision within the bushfire-prone area

This clause is in substitution for Bushfire-Prone Areas Code – clause C13.6.1 Provision of hazard management areas, C13.6.2 Public and fire fighting access and C13.6.3 Provision of water supply for fire fighting purposes.

Objective:	That subdivision within the Birralea Road Industrial Precinct is designed to provide appropriate road access and water supply to enable protection of life and property from bushfire.	
Acceptable Solutions		Performance Criteria
A1 Each lot, or a lot proposed in a plan of subdivision: <ul style="list-style-type: none"> (a) has access to a road with a carriageway width of no less than 10m; and (b) is connected to the reticulated water supply. 		P1 No Performance Criterion.
A2 Each lot, or a lot proposed in a plan of subdivision has a building area that is no less than 10m from the boundary of an Agriculture Zone.		P2 No Performance Criterion.

The objective for MEA-S1.8.3 refers to access and water supplies whereas the associated development standards relate to access, water and building areas. It is therefore suggested that the clause objective be amended to include reference to "appropriate building areas".

With regards to the Acceptable Solutions:

- The required minimum carriageway is more than adequate to support firefighter access;

- Future building work within the lots will be required to comply with National Construction Code standards for fire hydrants and that the optimal location of such hydrants within properties cannot be determined until a building design and site layout is prepared for a given lot. Building work that encroaches into the bushfire-prone areas overlay will be subject to bushfire-fighting water supply requirements through the building approvals process;
- The 10m minimum building area setback from the boundary of an Agricultural Zone reflects the minimum separation prescribed under AS 3959-2018 for BAL-19 for Grassland on flat topography and is consistent with the Bushfire-Prone Areas Code.

TFS is accordingly satisfied that the Acceptable Solutions will provide an equivalent outcome to that required by the Bushfire-Prone Areas Code.

Other comments

TFS has reviewed the proposed zoning applied to each of the TFS assets within the municipality and is satisfied the new provisions will not compromise the existing and ongoing use of the sites.

If TFS can provide any clarification or further information in relation to this submission, please contact Tom O'Connor (Planning & Assessment Officer) at tom.oconnor@fire.tas.gov.au.

Yours faithfully,



Chris Arnol
CHIEF OFFICER

19 December 2018