

Bushfire Assessment

50 GLENDALE RD, 110A MARSHALLS RD & LOT B TRARALGON-MAFFRA RD,
TRARALGON



C114 - Traralgon North Strip Rezoning

21783

Millar & Merrigan Pty Ltd

trading as
Millar Merrigan
ACN 005 541 668

Metro:

2/126 Merrindale Drive,
PO Box 247
Croydon, 3136
Telephone 03 8720 9500
Facsimile 03 8720 9501

Regional:

156 Commercial Road
Morwell, 3840
email@millarmerrigan.com.au
www.millarmerrigan.com.au

PREPARED BY MILLAR MERRIGAN ON BEHALF OF:

Latrobe City Council

FORMAL LAND DESCRIPTION:

Lot 1 on Plan of Subdivision PS329021 (Covenant D382326);
Lot 2 on Plan of Subdivision PS329021 (Covenant D285661); and
Lot B on Plan of Subdivision PS729261.

PROPOSAL:

C114 - Traralgon North Strip Rezoning

AUTHORITY:

Latrobe City Council

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CONTENTS

CONTENTS	1
1 INTRODUCTION	2
2 THE SITE & PROPOSAL	3
3 BUSHFIRE POLICY	5
3.1 CLAUSE 71.02 OPERATION OF THE PLANNING POLICY FRAMEWORK	5
3.2 PLANNING POLICY FRAMEWORK	5
3.3 BUSHFIRE MANAGEMENT OVERLAY	7
3.4 BUSHFIRE PRONE AREAS	8
4 BUSHFIRE HAZARD LANDSCAPE ASSESSMENT	10
4.1 FEATURES	10
4.2 LANDSCAPE TYPE	11
4.3 BUSHFIRE HISTORY	13
4.4 FIRE OPERATIONS PLAN	13
4.5 VICTORIAN FIRE RISK REGISTER	14
5 BUSHFIRE HAZARD SITE ASSESSMENT	16
5.1 LOCAL & NEIGHBOURHOOD CONDITIONS	16
5.2 TOPOGRAPHY	17
5.3 DEFENDABLE SPACE	17
6 SHELTER FROM BUSHFIRE	18
7 ACCESS	18
8 BIODIVERSITY CONSIDERATIONS	19
9 ASSESSMENT AGAINST CLAUSE 13.02	19
10 FIRE AUTHORITY LIASION	22
11 CONCLUSION AND RECOMMENDATIONS	24
12 APPENDICES	
APPENDIX 1: SUBDIVISION PLANS	
APPENDIX 2: INDICATIVE SUBDIVISION PLANS	
APPENDIX 3: VFRR INFORMATION	

1 INTRODUCTION

Millar Merrigan have been engaged to prepare this Bushfire Assessment by Latrobe City Council in relation to ***C114 - Traralgon North Strip Rezoning at 50 Glendale Rd, 110a Marshalls Rd & Lot B Traralgon-Maffra Rd, Traralgon.***

This assessment seeks to provide details and discussion on the following matters:

- Bushfire Policy
- Bushfire Hazard at the Landscape Scale
- Bushfire Hazard at the Site Scale
- Shelter Options
- Strategic Access
- Biodiversity
- Clause 13.02 Assessment

This report will assist Council, as the planning authority to consider bushfire risk in relation to the proposed rezoning. It is not an assessment against the subdivision requirements of the Bushfire Management Overlay and should not be used to assess a planning application.

2 THE SITE & PROPOSAL

The land subject to C114 comprises of three separate allotments located on the northern outskirts of Traralgon, as identified in Figure 1 below. Lots 1 and 2 contain dwellings, whereas Lot B is vacant. All lots are used for cattle grazing and a 24.38m wide easement for pipeline purposes dissects the land.

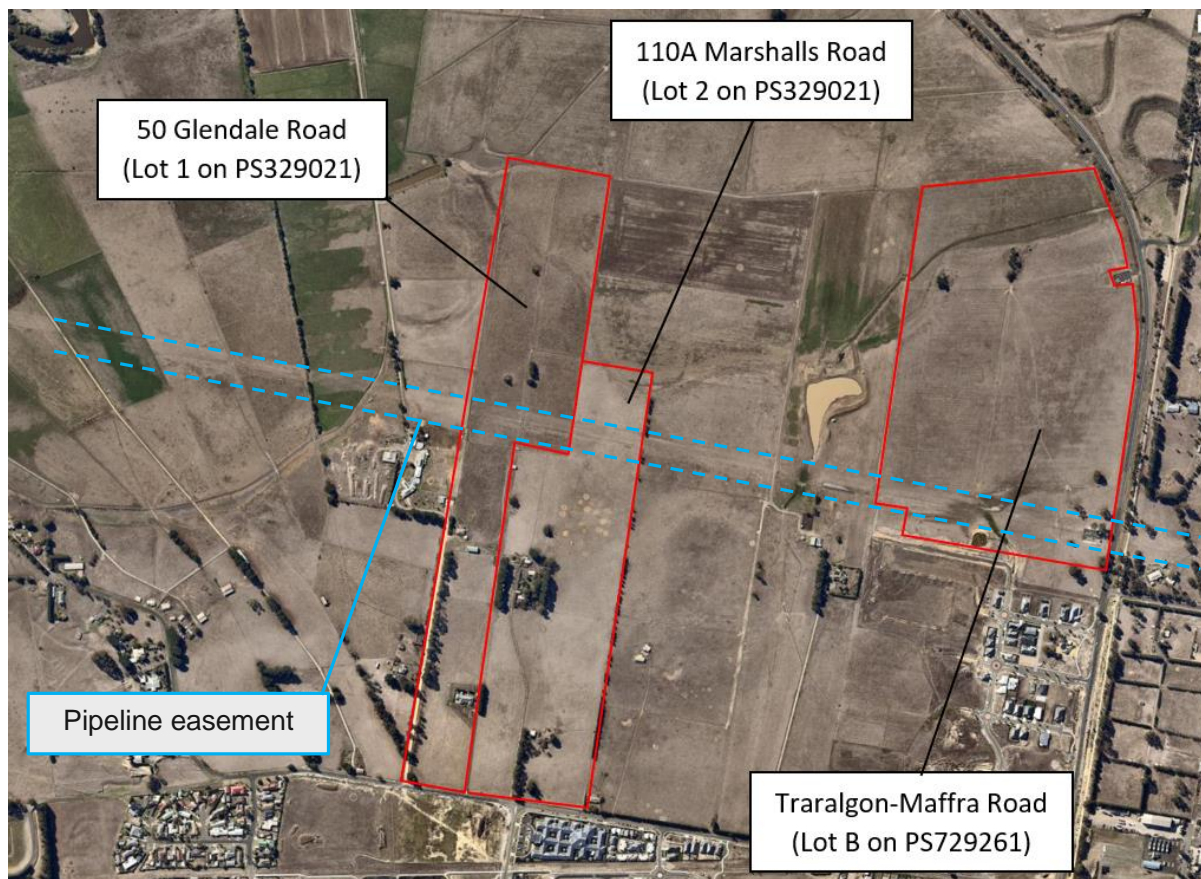


Figure 1: Aerial Image of Study Area

Lot B is contained wholly within the Farming Zone (FZ), whereas the southern parts of Lots 1 and 2 are contained within the General Residential Zone (GRZ) with the northern parts FZ, see Figure 2 below. The residentially zoned land has planning approval to be developed for multi lot subdivision and land to the south of Lot B is currently being developed for standard residential purposes with a supermarket and speciality shops approved for the corner of Marshalls Road and Traralgon-Maffra Road.

C114 seeks to rezone approximately 50m of FZ land directly north of the residential areas to cater for an additional row of residential allotments. Whilst no subdivision into residential allotments forms part of the rezoning, concurrent planning applications for the creation of balance allotments that accord with the proposed zone boundaries are before Council (see plans at Appendix 1). Indicative subdivision plans for future residential lots have been prepared and based on these it is envisioned that approximately 33 additional residential lots could be created as a result of the rezoning (see Appendix 2).

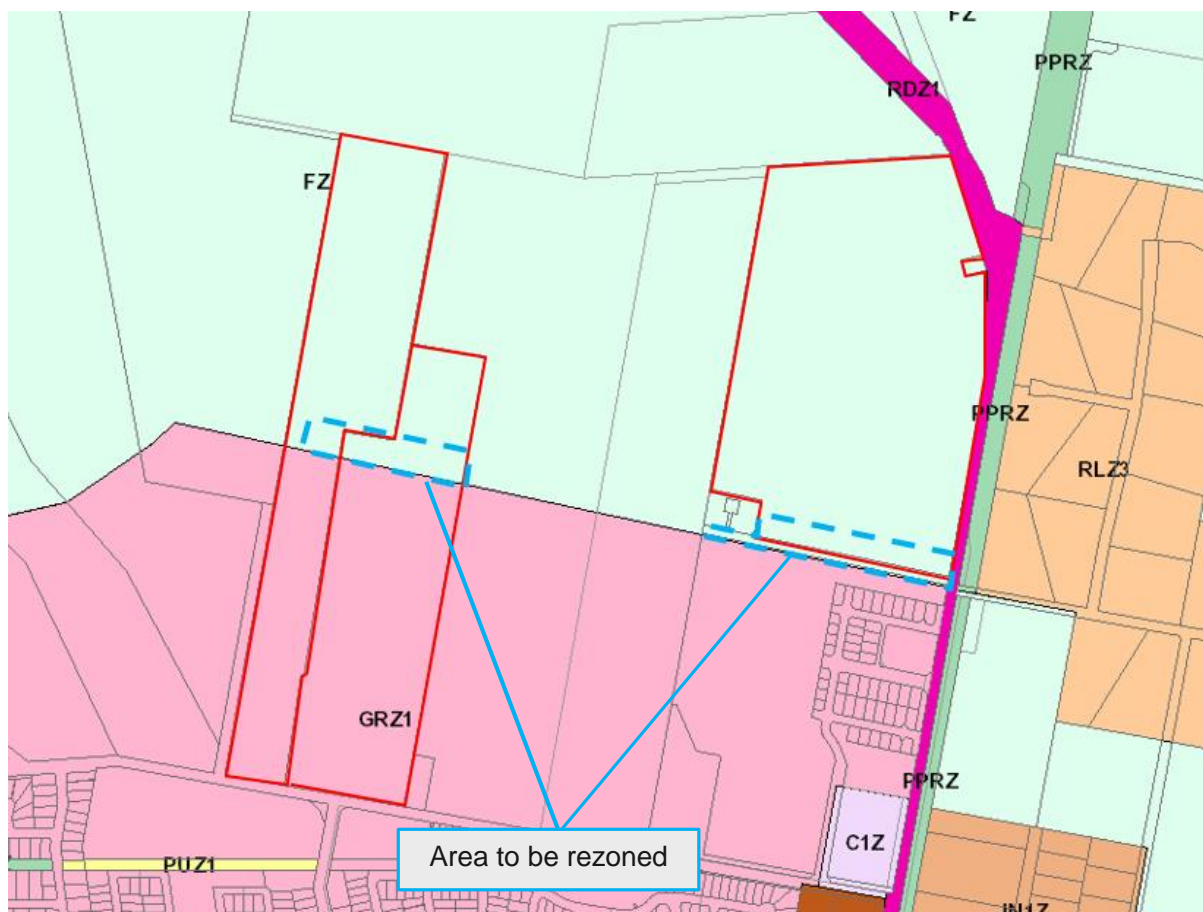


Figure 2: Land Zoning

3 BUSHFIRE POLICY

Planning Schemes contains a range of policies that are used to inform decision making and particular emphasis is placed on bushfire risk as outlined below.

3.1 CLAUSE 71.02 OPERATION OF THE PLANNING POLICY FRAMEWORK

The Planning Policy Framework provides a context for spatial planning and decision making by planning and responsible authorities. *Integrated Decision Making (71.02-3)* states that:

Planning and responsible authorities should endeavour to integrate the range of planning policies relevant to the issues to be determined and balance conflicting objectives in favour of net community benefit and sustainable development for the benefit of present and future generations. However, in bushfire affected areas, planning and responsible authorities must prioritise the protection of human life over all other policy considerations.

In accordance with this directive, bushfire considerations must be prioritised over all other elements and this emphasis was introduced to the scheme through Amendment VC140 (December 2017) which was a recommendation made by the 2009 Victorian Bushfires Royal Commission.

3.2 PLANNING POLICY FRAMEWORK

The Planning Policy Framework is based around a series of themes, which includes *Clause 13 Environmental Risks and Amenity*. *Clause 13.02-1S Bushfire Planning* is of particular relevance to decision making and seeks:

- *To strengthen the resilience of settlements and communities to bushfire through risk-based planning that prioritises the protection of human life.*

A series of strategies are outlined as follows:

PROTECTION OF HUMAN LIFE

Give priority to the protection of human life by:

- *Prioritising the protection of human life over all other policy considerations.*
- *Directing population growth and development to low risk locations and ensuring the availability of, and safe access to, areas where human life can be better protected from the effects of bushfire.*
- *Reducing the vulnerability of communities to bushfire through the consideration of bushfire risk in decision making at all stages of the planning process.*

BUSHFIRE HAZARD IDENTIFICATION AND ASSESSMENT

Identify bushfire hazard and undertake appropriate risk assessment by:

- *Applying the best available science to identify vegetation, topographic and climatic conditions that create a bushfire hazard.*
- *Considering the best available information about bushfire hazard including the map of designated bushfire prone areas prepared under the Building Act 1993 or regulations made under that Act.*
- *Applying the Bushfire Management Overlay to areas where the extent of vegetation can create an extreme bushfire hazard.*
- *Considering and assessing the bushfire hazard on the basis of:*
 - *Landscape conditions - meaning conditions in the landscape within 20 kilometres (and potentially up to 75 kilometres) of a site;*
 - *Local conditions - meaning conditions in the area within approximately 1 kilometre of a site;*

- Neighbourhood conditions - meaning conditions in the area within 400 metres of a site; and
- The site for the development.
- Consulting with emergency management agencies and the relevant fire authority early in the process to receive their recommendations and implement appropriate bushfire protection measures.
- Ensuring that strategic planning documents, planning scheme amendments, planning permit applications and development plan approvals properly assess bushfire risk and include appropriate bushfire protection measures.
- Not approving development where a landowner or proponent has not satisfactorily demonstrated that the relevant policies have been addressed, performance measures satisfied or bushfire protection measures can be adequately implemented.

SETTLEMENT PLANNING

Plan to strengthen the resilience of settlements and communities and prioritise protection of human life by:

- Directing population growth and development to low risk locations, being those locations assessed as having a radiant heat flux of less than 12.5 kilowatts/square metre under AS 3959-2009 Construction of Buildings in Bushfire-prone Areas (Standards Australia, 2009).
- Ensuring the availability of, and safe access to, areas assessed as a BAL-LOW rating under AS 3959-2009 Construction of Buildings in Bushfire-prone Areas (Standards Australia, 2009) where human life can be better protected from the effects of bushfire.
- Ensuring the bushfire risk to existing and future residents, property and community infrastructure will not increase as a result of future land use and development.
- Achieving no net increase in risk to existing and future residents, property and community infrastructure, through the implementation of bushfire protection measures and where possible reducing bushfire risk overall.
- Assessing and addressing the bushfire hazard posed to the settlement and the likely bushfire behaviour it will produce at a landscape, settlement, local, neighbourhood and site scale, including the potential for neighbourhood-scale destruction.
- Assessing alternative low risk locations for settlement growth on a regional, municipal, settlement, local and neighbourhood basis.
- Not approving any strategic planning document, local planning policy, or planning scheme amendment that will result in the introduction or intensification of development in an area that has, or will on completion have, more than a BAL-12.5 rating under AS 3959-2009 Construction of Buildings in Bushfire-prone Areas (Standards Australia, 2009).

AREAS OF BIODIVERSITY CONSERVATION VALUE

Ensure settlement growth and development approvals can implement bushfire protection measures without unacceptable biodiversity impacts by discouraging settlement growth and development in bushfire affected areas that are important areas of biodiversity.

USE AND DEVELOPMENT CONTROL IN A BUSHFIRE PRONE AREA

In a bushfire prone area designated in accordance with regulations made under the Building Act 1993, bushfire risk should be considered when assessing planning applications for the following uses and development:

- Subdivisions of more than 10 lots.
- Accommodation.
- Child care centre.
- Education centre.
- Emergency services facility.
- Hospital. Indoor recreation facility.

- Major sports and recreation facility.
- Place of assembly.
- Any application for development that will result in people congregating in large numbers.

When assessing a planning permit application for the above uses and development:

- Consider the risk of bushfire to people, property and community infrastructure.
- Require the implementation of appropriate bushfire protection measures to address the identified bushfire risk.
- Ensure new development can implement bushfire protection measures without unacceptable biodiversity impacts

3.3 BUSHFIRE MANAGEMENT OVERLAY

The Bushfire Management Overlay (Clause 44.06) (BMO) is applied to areas where there is potential for extreme bushfire behaviour, such as a crown fire, extreme ember attack and radiant heat. It seeks:

- To implement the Municipal Planning Strategy and the Planning Policy Framework.
- To ensure that the development of land prioritises the protection of human life and strengthens community resilience to bushfire.
- To identify areas where the bushfire hazard warrants bushfire protection measures to be implemented.
- To ensure development is only permitted where the risk to life and property from bushfire can be reduced to an acceptable level.

The BMO mapping addresses bushfire hazard through assessment of fire behaviour generated from several factors including topography, fire fuel type and load, and weather. A key output is modelled head fire intensity levels which is a measure of the rate of energy release per unit length of fire front expressed as kW/m. The most significant bushfire hazard is where head fire intensity is modelled to be 30,000kW/m or more. This level of hazard informs where the BMO applies. (Source: Planning Advisory Note 46 Bushfire Management Overlay Mapping Methodology and Criteria, DTPLI, 2013).

Pursuant to the BMO a permit is required to subdivide land and undertake buildings and works associated with a series of specified uses. It applies the requirements of Clause 53.02 Bushfire Planning which seek:

- To ensure that the development of land prioritises the protection of human life and strengthens community resilience to bushfire.
- To ensure that the location, design and construction of development appropriately responds to the bushfire hazard.
- To ensure development is only permitted where the risk to life, property and community infrastructure from bushfire can be reduced to an acceptable level.
- To specify location, design and construction measures for a single dwelling that reduces the bushfire risk to life and property to an acceptable level.

The BMO and subsequently Bushfire Planning are not applicable to a rezoning application and would be addressed at subdivision stage if the BMO applied.

There is no BMO applicable to the land subject to the proposed rezoning.



Figure 3: Bushfire Management Overlay Mapping (source: mapshare.vic.gov.au)

3.4 BUSHFIRE PRONE AREAS

Bushfire Prone Areas (BPA) are areas that are subject to or likely to be subject to bushfires and are determined by the Minister for Planning for the purposes of the building control system. Specific bushfire construction standards apply in designated BPA in Victoria and these are aimed at improving bushfire protection for residential buildings.

BPA mapping includes all areas mapped by the BMO and extend to wider areas where moderate bushfire hazard can be expected. These are areas with head fire intensity modelled to be between 4,000kW/m and 30,000kW/m. (Source: Planning Advisory Note 46 Bushfire Management Overlay Mapping Methodology and Criteria, DTPLI, 2013).

A minimum construction standard applies to new residential buildings, schools, child care centres, hospitals, aged care facilities and associated buildings in designated Bushfire Prone Areas. Landowners are required to build to a minimum Bushfire Attack Level of 12.5.

A Bushfire Attack Level (BAL) is a way of measuring the severity of a building's potential exposure to ember attack, radiant heat and direct flame contact.

There are six Bushfire Attack Levels that form part of the Australian Standard for construction of buildings in bushfire prone areas (AS 3959-2009); BAL-LOW, BAL-12.5, BAL-19, BAL-29, BAL-40 and BAL-FZ (Flame Zone).

The requirements of the BPA are applied at building permit stage under the Building Regulations 2018.

As detailed above, Clause 13.02 includes requirements for BPA which bridge the gap for certain uses on land that is not covered by the BMO.

The subject land is wholly contained within the BPA but it is expected that this would be removed as residential subdivisions develop. This is evidenced by the developing subdivision to the south of the land which has already had the BPA removed from the constructed areas, see Figure 4 below.

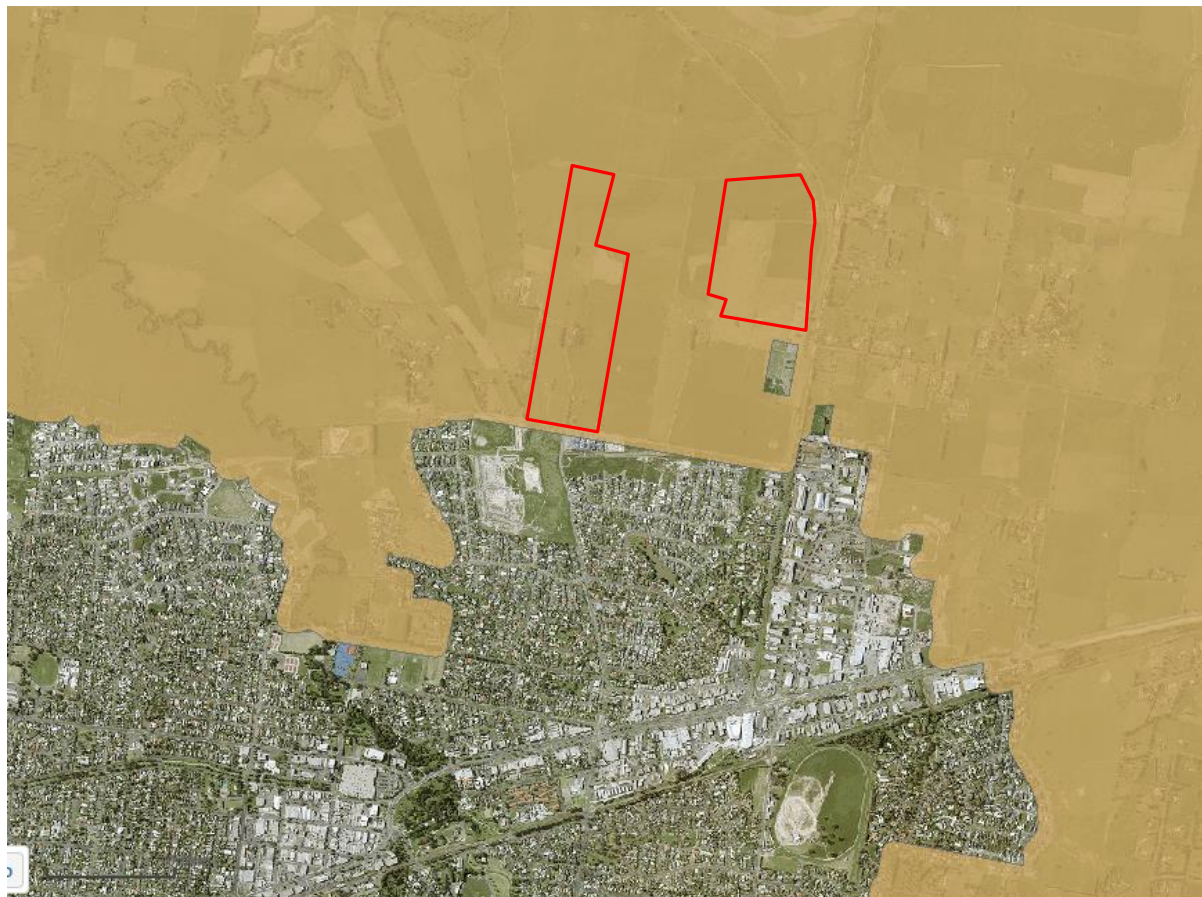


Figure 4: Bushfire Prone Area Mapping (source: mapshare.vic.gov.au)

4 BUSHFIRE HAZARD LANDSCAPE ASSESSMENT

The bushfire hazard landscape assessment provides information on the bushfire hazard for 20km (or greater) around a development site. Considering bushfire from this broader landscape perspective is important as it affects the level of bushfire risk a development and its future occupants may be exposed to. The landscape assessment seeks to:

- Provide factual information on the bushfire hazard (vegetation extent and slope)
- Provide information on key features of the general locality that are relevant to better understanding the protection provided by the location
- Provide contextual information on a site

(Source: *Planning Permit Applications Bushfire Management Overlay, Technical Guide, DELWP, 2017*).

The broader landscape and the potential size or scale of a bushfire is an important consideration for decision makers as the likelihood of a bushfire, its severity and intensity, and the potential impact on life and property varies depending on where a site is located in the surrounding landscape.

Bushfire is a dynamic hazard and can be highly unpredictable. Because of this the factors that contribute to the bushfire risk are diverse. The purpose of the landscape assessment is not to predict the outcome of a bushfire event but to provide information that builds a better understanding of the bushfire risk in a location and to help make informed decisions. (Source: *Planning Permit Applications Bushfire Management Overlay, Technical Guide, DELWP, 2017*).

The following sections provide an assessment against the bushfire hazard landscape around the subject site.

4.1 FEATURES

The wider landscape is divided into four distinct areas as follows:

- Princes Highway dissects the landscape in a south-west / east direction and the regional urban areas of Morwell, Traralgon and Rosedale are located along this major arterial road. The central hub of these areas are not within the BPA and as such are BAL-LOW, whilst the fringe urban areas are contained within the BPA due to their interface with surrounding farm land. The urban areas do not pose a bushfire risk.
- The settlements are generally surrounded by cleared farming land and rural living areas. The grassed areas in these locations create a fire risk to the urban interface areas and fire runs up to 10km could occur. The urban areas of Traralgon would protect the subject site from a fire approaching in a south-westerly direction. A direct interface with grassland areas is present to the north-west and these edges would be expected to receive radiant heat and flame contact. In isolation, grassland is not considered a significant landscape risk, rather it is a significant risk at the local scale.
- Various open cut mines and mills are located within the wider area and some of these have a history of fire events. The existing urban areas of Traralgon would be impacted by any fire events from these features before the subject land was impacted.
- Forested areas and plantations flank the farming areas to the north and south of the assessment area and fire runs in the tens of kilometres present. From a north-westerly direction, a forest fire would generate dangerous fire behaviour due to the long fire runs and steep topography. A fire event in this location would generate ember attack into the grassland areas, increasing the likelihood of grass fires. A fire in the forested areas to the south of the assessment area would likely present as a flank fire to the grassed areas due to prevailing wind conditions. This would not impact the site due to the expansive urban areas of Traralgon creating a buffer to grass fires. There is also a plantation area to the west of Traralgon that would allow a fire run of approximately

7km. There would need to be extensive destruction of rural living and urban areas on the west side of Traralgon before the subject land was impacted by a forest fire in this location. Interaction with farming areas may however see grassfire travel north-east towards the northern end of the subject land.

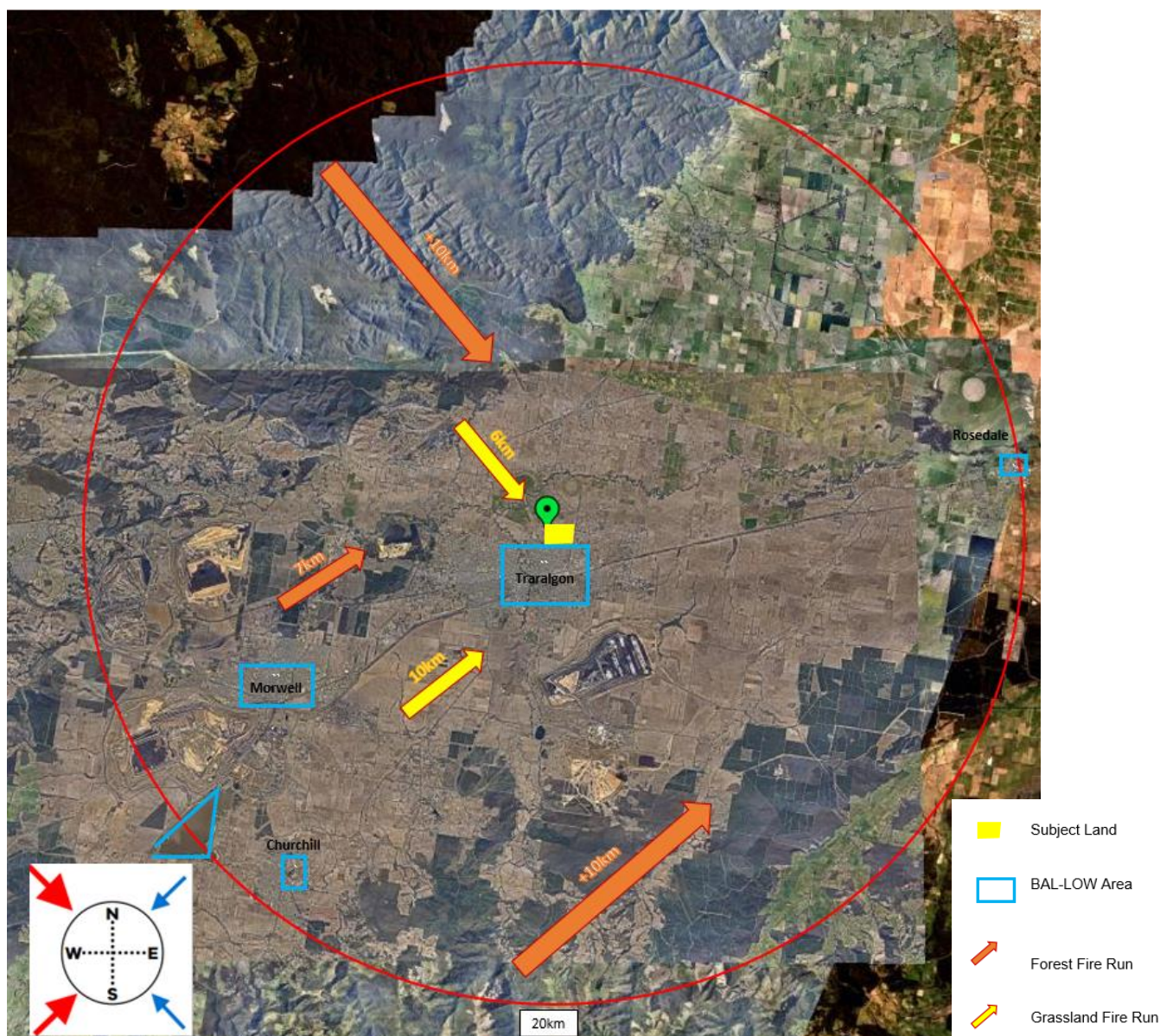


Figure 5: Landscape Assessment

4.2 LANDSCAPE TYPE

Landscape types are set out within the Bushfire Management Overlay Technical Guide (DELWP, 2017) and based on the features within the wider landscape the area is considered to be comparable to Broader Landscape Type 2 which is described as follows:

- *The type and extent of vegetation located more than 150 metres from the site may result in neighbourhood-scale destruction as it interacts with the bushfire hazard on and close to a site.*
- *Bushfire can only approach from one aspect and the site is located in a suburban, township or urban area managed in a minimum fuel condition.*

- *Access is readily available to a place that provides shelter from bushfire. This will often be the surrounding developed area.*

(source: Planning Permit Applications Bushfire Management Overlay, Technical Guide, DELWP, 2017).

The type and extent of vegetation in the wider area may result in neighbourhood scale destruction, however the site is located within an urban area (albeit the approved subdivisions are yet to be fully developed) which is managed to minimum fuel conditions and access to a place that provides shelter from a bushfire is available (being the BAL-LOW areas of Traralgon).

This said, from a wider landscape perspective fire could approach from more than one direction and as such the landscape risk is considered to roll into Broader Landscape Type 3 which is described as follows:

- *The type and extent of vegetation located more than 150 metres from the site may result in neighbourhood-scale destruction as it interacts with the bushfire hazard on and close to a site.*
- *Bushfire can approach from more than one aspect.*
- *The site is located in an area that is not managed in a minimum fuel condition.*
- *Access to an appropriate place that provides shelter from bushfire is not certain*

(source: Planning Permit Applications Bushfire Management Overlay, Technical Guide, DELWP, 2017).

To consider the suitability and adequacy of the standard design fire of AS3959, judging the size to which a fire can grow and develop before impacting the site is crucial. This is because the scale of a bushfire and therefore its destructive power is driven by the characteristics of the broader landscape, rather than those assessed immediately around the site (i.e. within the 150m assessment area). *(source: Guideline – Applying the Bushfire Hazard Landscape Assessment in a Bushfire Management Overlay, CFA, September 2018).*

For buildings and works applications under the BMO the CFA guideline states that:
It may be necessary to further enhance safety through additional bushfire protection measures in landscape types Three or Four.

And

Subdivision creating new lots should be carefully considered and may not be appropriate in these areas.

(source: Guideline – Applying the Bushfire Hazard Landscape Assessment in a Bushfire Management Overlay, CFA, September 2018).

The guideline specifically relates to development/subdivision in the BMO and it must be acknowledged that the land is not covered by this overlay, as the location has not been identified as an area where head fire intensity is modelled to be 30,000kW/m or more.

Whilst the landscape risk may show similarities to Broader Landscape Type 3 in that fire could approach from more than one direction, the existing urban areas of Traralgon would limit any direct impact to the subject site from a southern and western direction. The land to be rezoned is small in area, directly abuts developing residential land to the south, and long term urban growth is intended to be directed in a northerly direction in accordance with Traralgon-Morwell Growth Framework Plan. Based on these factors, it is not considered necessary to apply enhanced bushfire protection measures, such as increased defensible space to increased construction standard.

4.3 BUSHFIRE HISTORY

Bushfire history data shows that large scale fires have occurred to the north and south of the wider landscape, with smaller fires around the open cut mines and plantations, see Figure 6.

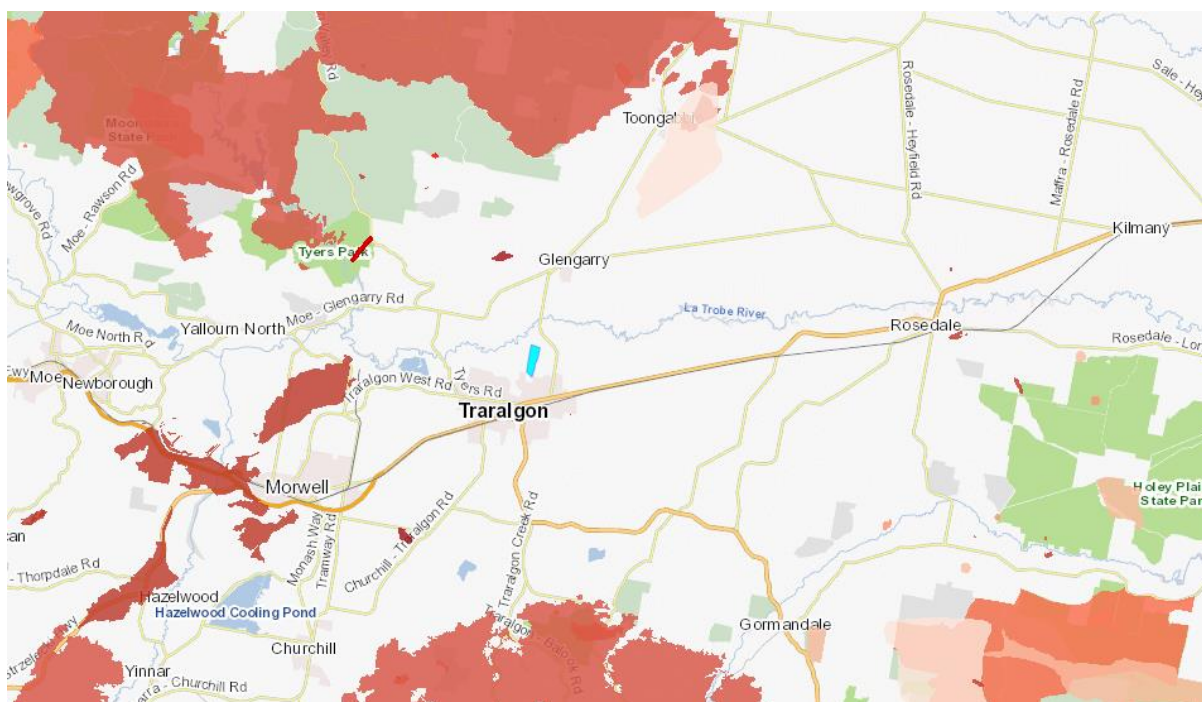


Figure 6: Bushfire History (source: mapshare.vic.gov.au)

4.4 FIRE OPERATIONS PLAN

The Fire Operations Plan shows that planned burns occur in public land across the wider areas, see Figure 7 below. Given the absence of forested areas within close proximity to the site, no fuel management actions occur within close proximity and as such they are not considered to provide any specific protection to the subject site from a landscape bushfire protection perspective.

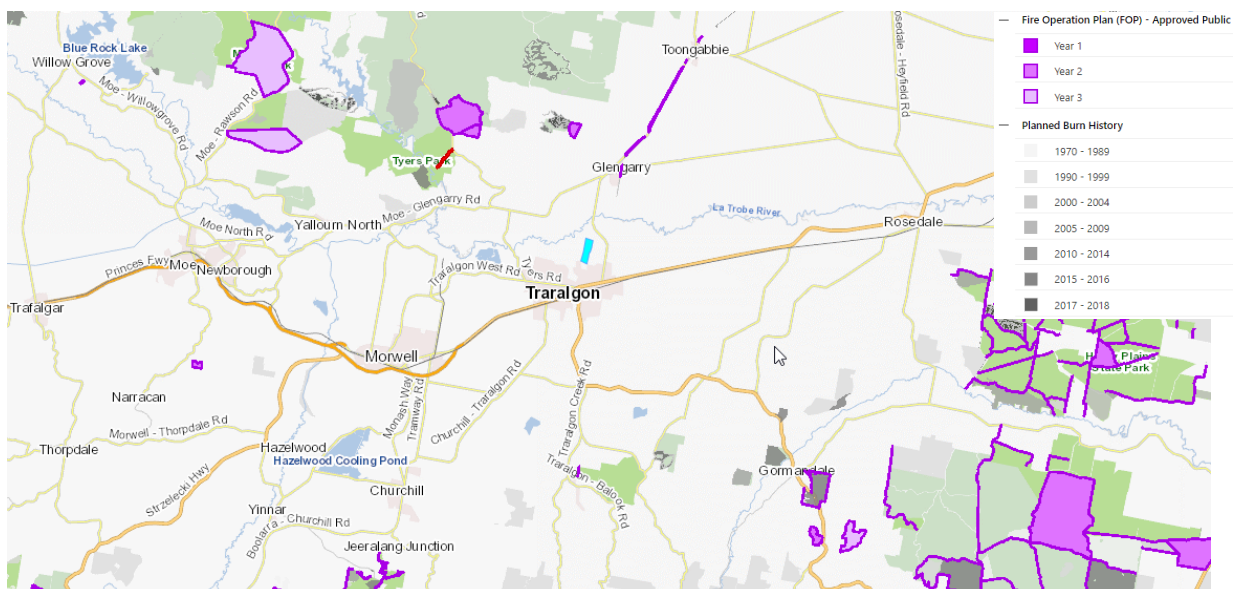


Figure 7: Fire Operations Plan (source: mapshare.vic.gov.au)

4.5 VICTORIAN FIRE RISK REGISTER

Information provided by Latrobe City Council from the Victorian Fire Risk Register (VFRR) shows that the risk to the northern parts of Traralgon is 'High', see Figure 8 below. The areas to be rezoned are not rated.

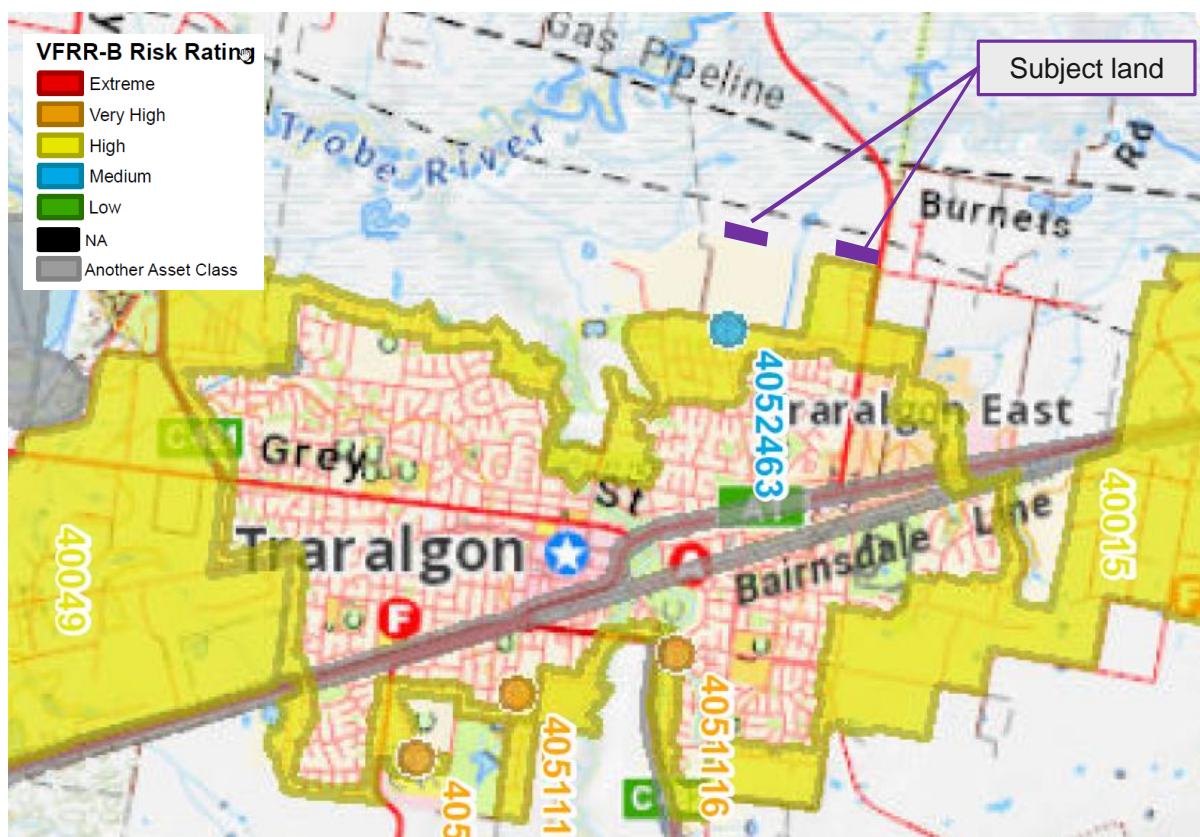


Figure 8: Victorian Fire Risk Register (source: provided by Latrobe City Council)

More detailed data from Council's GIS identifies the subject properties as part of the 'Traralgon Interface' asset (refer to Appendix 1). It can be assumed that this is due to the fact that existing and developing urban areas have an interface with grassland areas. Whilst the risk rating is 'High', the threat is 'Medium' and the likelihood is 'Almost Certain', the consequence is 'Minor' and the vulnerability is 'Low'. The hazard is specified as 'smoke impact and direct flame (grassland)'.

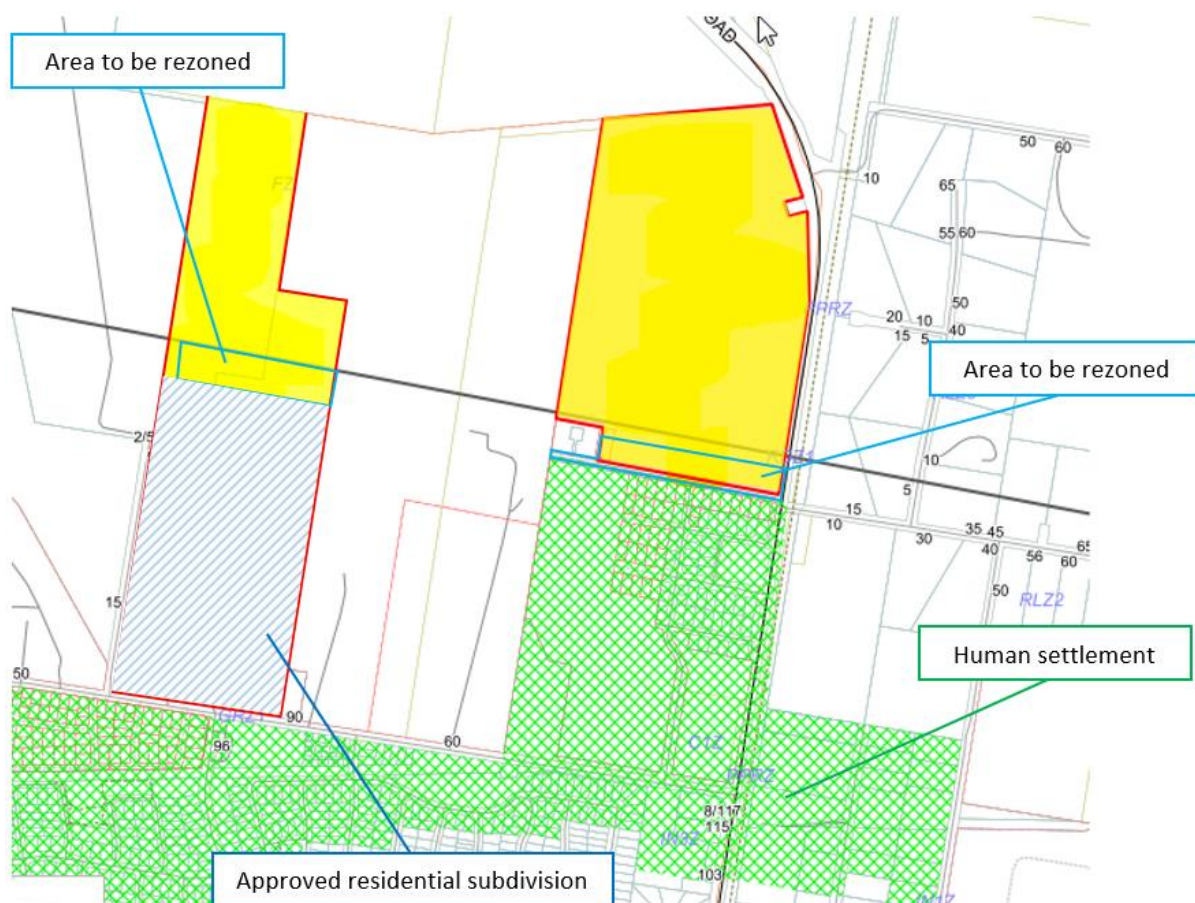


Figure 9: LCC GIS Mapping (source: LCC)

5 BUSHFIRE HAZARD SITE ASSESSMENT

The bushfire hazard site assessment documents the bushfire hazard on and near a site. The assessment seeks to:

- Provide factual information on the bushfire hazard (vegetation type and slope)
- Inform defensible space and building construction requirements

(Source: *Planning Permit Applications Bushfire Management Overlay, Technical Guide, DELWP, 2017*).

It is informed by the methodology contained in *Australian Standard AS3959:2009 Construction of buildings in bushfire prone areas (AS3959)* to provide contextual information on a site.

The following sections provide an assessment against the bushfire hazard site assessment.

5.1 LOCAL & NEIGHBOURHOOD CONDITIONS

The local (1km) and neighbourhood conditions (400m) around the land to be rezoned comprise wholly of urban development to the south, rural living and grassland to the east and grassland to the north and west, see Figure 10.

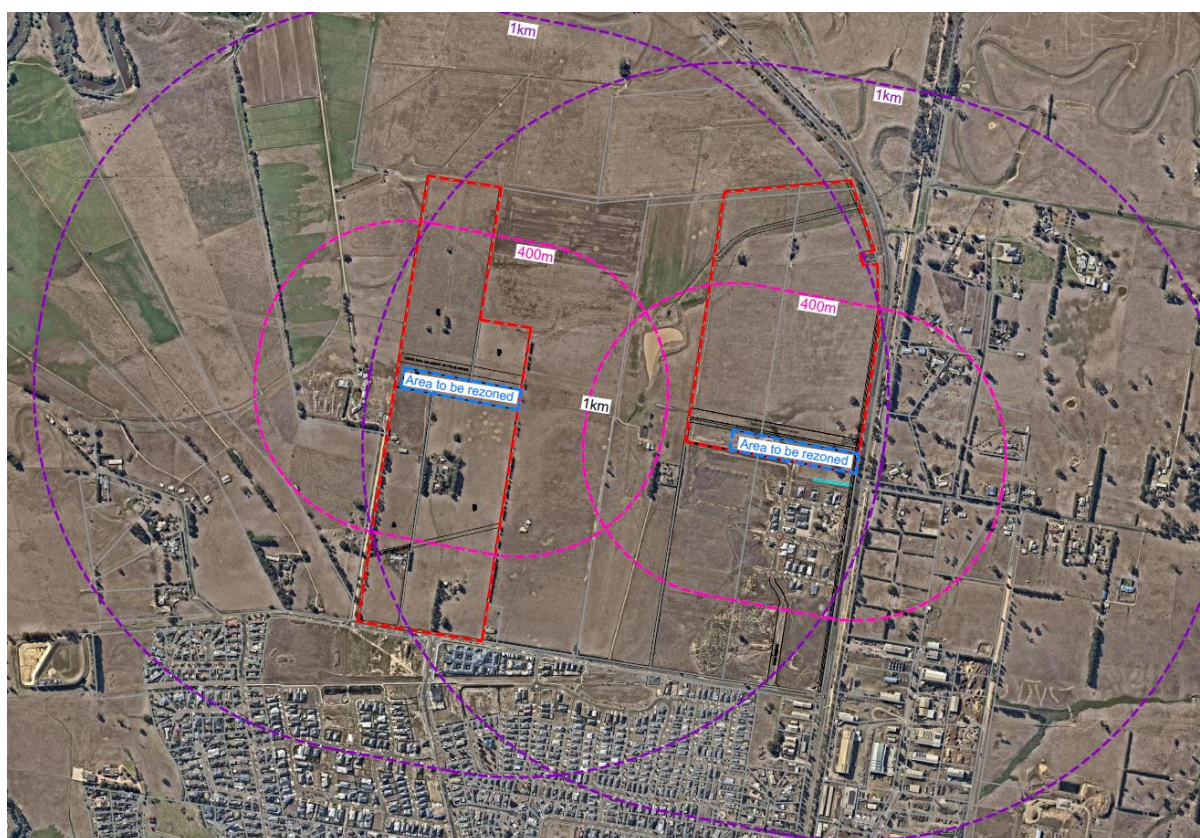


Figure 10: Local & Neighbourhood Conditions

5.2 TOPOGRAPHY

The local area is relatively flat, offering a slight fall from south-east to north-west towards the Latrobe River.

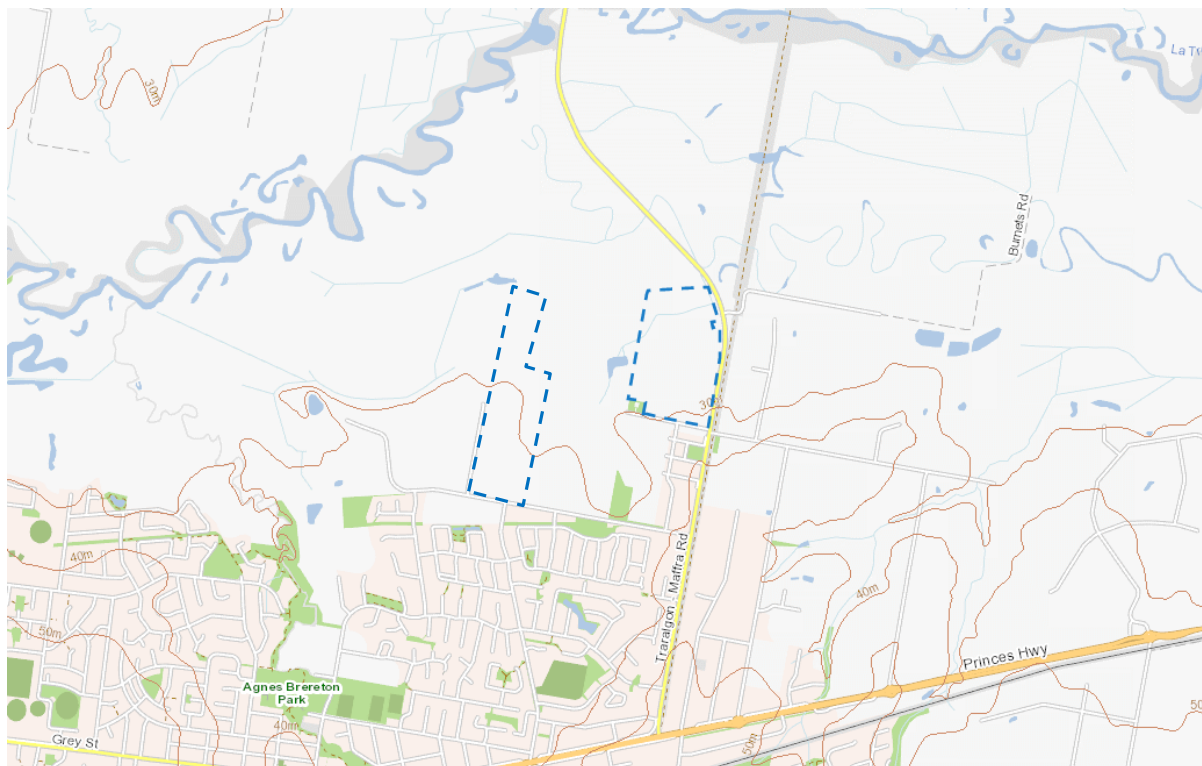


Figure 11: Topography (source mapshare.vic.gov.au)

5.3 DEFENDABLE SPACE

Whilst this assessment is focused on strategic bushfire policies, it is a requirement of [Clause 13.02](#) that planning scheme amendments are not to be approved in an area that has more than a BAL-12.5 rating under *AS3959-2009 Construction of Buildings in Bushfire-prone Areas* (Standards Australia, 2009).

The worst case scenario vegetation within the assessment area is Grassland and the slope varies from 0-5 degrees in a north and west direction to upslope in an easterly direction.

The following defensible space distances therefore apply in accordance with AS3959:

- 19-50m Grassland upslope;
- 22-50m Grassland 0-5 degrees downslope.

To the south is existing, developing and approved urban development and as such there is no inherent risk in this direction. The roads in this location would need to be constructed before the subject land could be accessed and as such there is certainty that there would be no grassland threat in this direction.

The land to be rezoned is situated between urban development and a grassland threat to the north. It is intended to accommodate a single row of residential allotments (subject to separate planning approval) that back onto the adjacent farming land. The depth of the land to be rezoned is approximately 55m which provides ample provision to comply with BAL-12.5 requirements.

Consideration will need to be given to the width of any future residential lots on the eastern and western sides of 50 Glendale Road and 110A Marshalls Road if abutting land on these sides remains as grassland at the time a subdivision permit is sought. Council are required to consider Clause 13.02 when assessing subdivision of 10 or more lots and it is considered that this provides sufficient means to ensure that bushfire protection measures are addressed. Use of building envelopes, exclusion zones and/or a restriction on title would be an appropriate way of ensuring that lots are developed to BAL-12.5 and these would be applied at subdivision stage.

The eastern and western interfaces for the land at Lot B Traralgon-Maffra Road would abut municipal reserves and it is fair to assume that these would present as low threat conditions and acts as an appropriate buffers to surrounding grassland.

6 SHELTER FROM BUSHFIRE

Neighbourhood Safer Places (also known as a 'Bushfire Place of Last Resort' (NSP-BPLR)) are designated places of last resort when all other bushfire plans have failed. They may provide some protection from direct flame and heat from a fire, but they do not guarantee safety.

There are no designated places of last resort in the vicinity of the subject site, with only two provided within Latrobe City Council; Boolarra Memorial Hall and Yinnar Primary School.

There is however safe and convenient access available to BAL-LOW areas of Traralgon. These are locations where ember attack and radiant heat is below 12.5kw/m².

As evidenced by the current BPA mapping, it is expected that once developed, the mapping will be removed from the residential areas around the site, simply remaining for the interface areas.

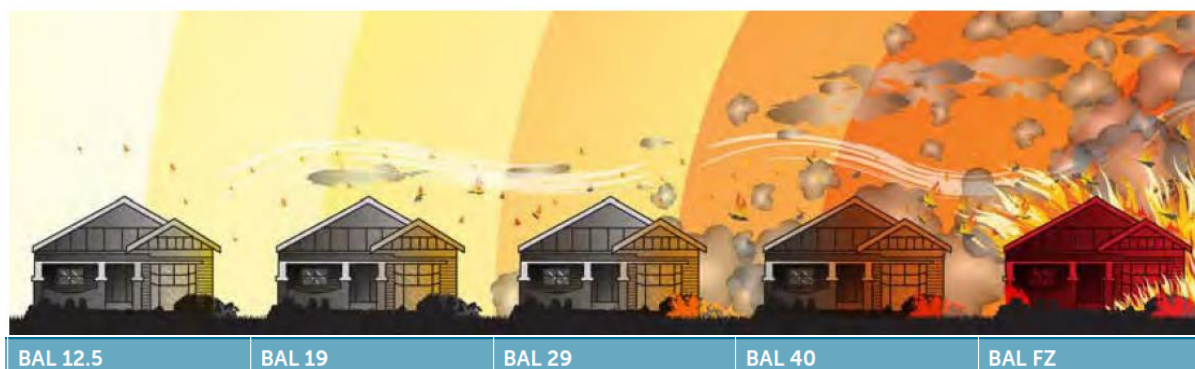


Figure 12: Building Impact (source BMO Technical Guide, DELP, 2017)

7 ACCESS

The BAL-LOW areas of Traralgon are only 600m away from the site and will be accessible via roads being constructed as part of approved subdivisions. These provide key north-south links that connect with Marshalls Road and there are numerous roads that provide access to the abutting BAL-LOW areas. These access routes do not pass through any permanent bushfire hazards.

8 BIODIVERSITY CONSIDERATIONS

Clause 13.02 encourages biodiversity impacts to be considered when investigating settlement growth in bushfire affected areas. The land proposed to be rezoned comprises wholly of grassed areas with the exception of a couple of scattered trees and based on 2005 Ecological Vegetation Class (EVC) mapping there are no areas of intact native vegetation on site, see Figure 13 below. There is in fact, very little native vegetation remaining in the wider area due to the long history of farming activities, with only small remnants of Plains Grassy Woodland, Floodplain Riparian Woodland, Swamp Scrub and Lowland Forest.

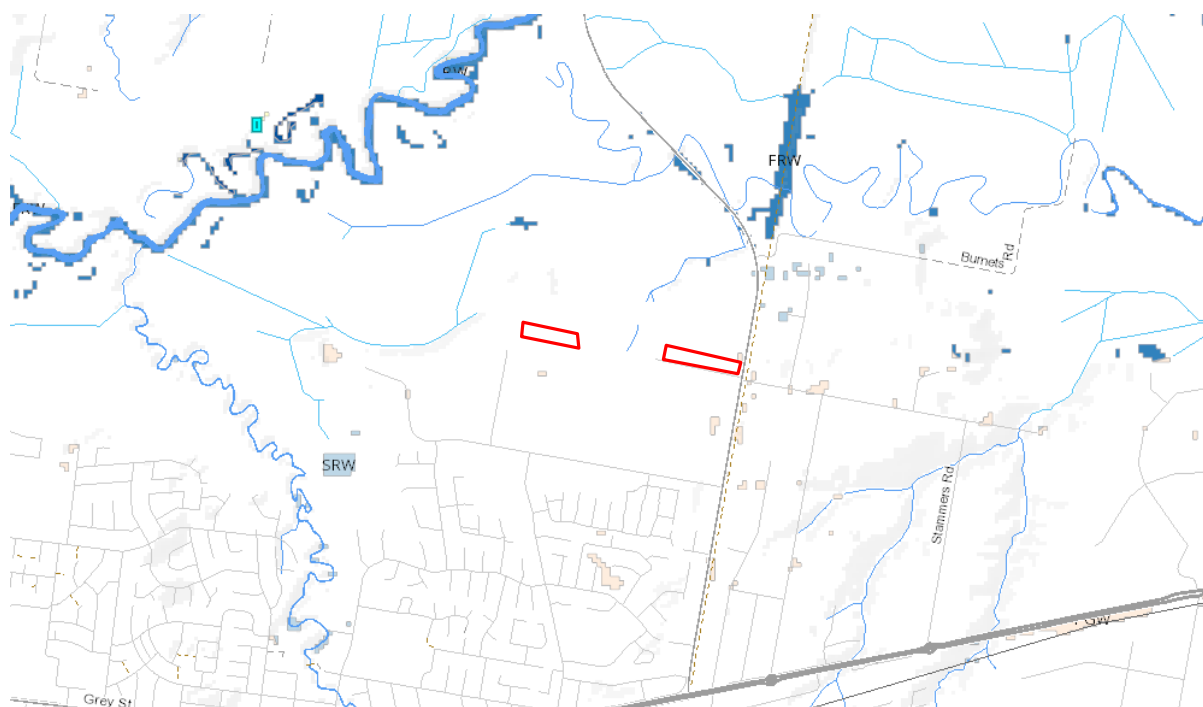


Figure 13: 2005 Ecological Vegetation Classes (source: maps.biodiversity.vic.gov.au)

9 ASSESSMENT AGAINST CLAUSE 13.02

The following sections provide an assessment against the relevant matters of *Clause 13.02* in light of the findings discussed above.

PROTECTION OF HUMAN LIFE

Population growth is to be directed to low risk locations and reduce the vulnerability of communities to bushfire risk. As per the VFFR, the subject land is not rated, but existing urban grassland interfaces in this location have a risk of 'High'. This is based on localised risk from grassfire and subject to suitable setbacks and construction standard it is considered that risk to life has been prioritised.

BUSHFIRE HAZARD

The site and landscape bushfire hazard has been identified above and concludes that the landscape risk is high due to the forested areas that flank the farming and urban areas and that there is direct potential for grassfires. This risk is moderated by the fact that there are generous areas of low risk conditions in the urban areas of Traralgon and excellent access is available to

these areas. Additionally, the site offers low fuel conditions and future lots have the ability to achieve applicable bushfire protection measures.

SETTLEMENT PLANNING

The area of land to be rezoned can feasibly achieve building areas with a radiant heat flux of less than 12.5 kilowatts/square metre in accordance with AS3959 when considering the abutting grassland hazard. It must also be noted that there is potential for future long term growth to the north of the subject land and it is almost guaranteed that any further development in this direction would see the pipeline reserve to the north of the land developed as a reserve. This would remove any interface hazard to the subject land and also reduce risk to existing and future residents as required by Clause 13.02.

Easy and convenient access is available to the BAL-LOW areas of Traralgon which essentially abut the subject land.

The wider landscape (20km) presents a significant risk due to forested areas however in considering likely bushfire behaviour, the biggest threat to the subject land is from grassfire and this risk can be mitigated through suitable setbacks and construction standards.

The Traralgon-Morwell Growth Framework Plan contained within Clause 21.02 of the Latrobe Planning Scheme, shows that long term urban development is to be directed to the north, south-east and west of Traralgon, see Figure 14 below. The subject land is contained within ‘1st Stage Future Residential’ which is showing evidence of new development and directly north of the pipeline easement is ‘2nd Stage Future Residential’. The Framework Plan was informed by the Traralgon Growth Areas Review (TGAR) and clearly demonstrates that Council are seeking to extend urban development in a northerly direction. On this basis, the land to be rezoned is unlikely to be the ‘ultimate’ grassland interface and given the limitations posed by the pipeline easement to the north of the subject land it is essentially a given that this land will be developed as public open space.

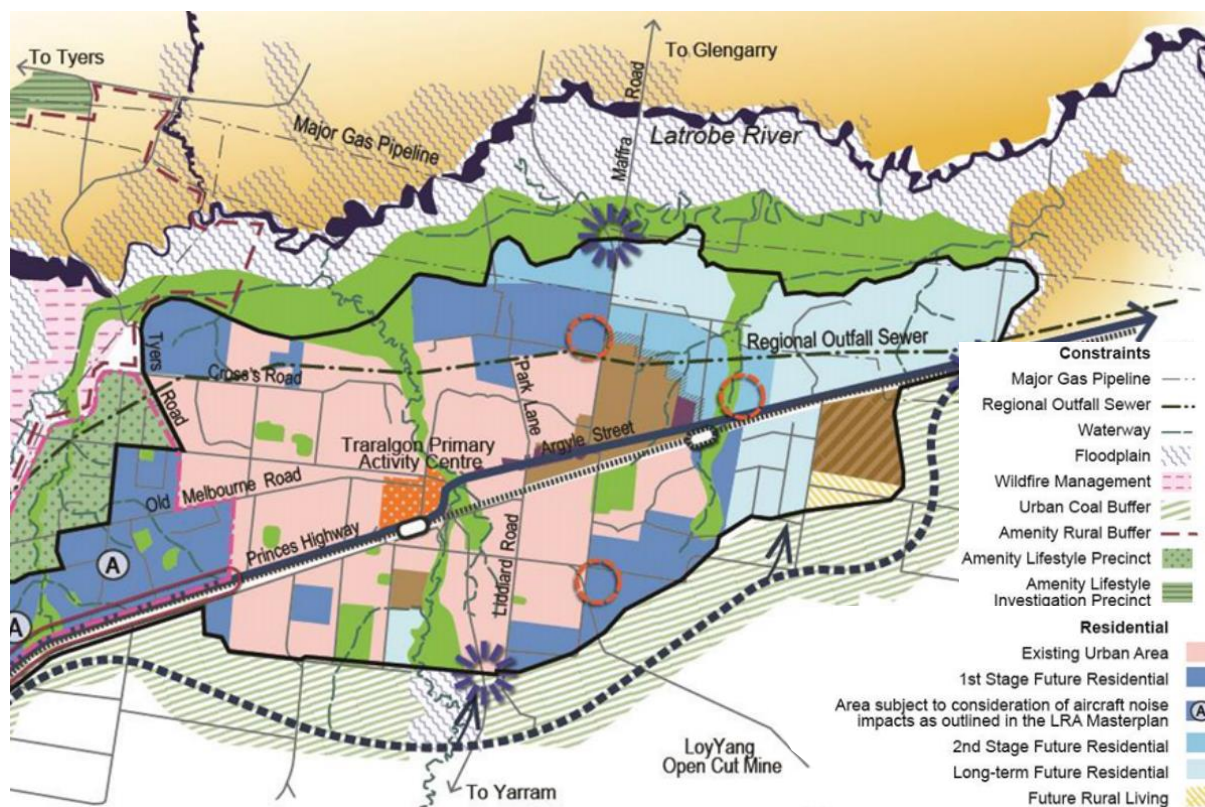


Figure 14: Traralgon-Morwell Growth Framework Plan (source: Latrobe Planning Scheme)

Whilst the proposal is in accordance with the intended direction of urban growth in the Traralgon-Morwell Framework Plan, alternative locations are required to be considered under *Clause 13.02*. From a regional scale, Traralgon is considered to be an appropriate location for future development in favour of locations that have a more compact urban area and are not located along the main arterial road network such as Churchill, Glengarry and Rosedale. From a town scale, there are some non-urban areas within the northern and southern parts of the established settlement, however these are contained within the Urban Floodway Zone (UFZ) and not suitable for residential development. The eastern and western interface areas are considered to have a greater bushfire risk than the subject land, due to proximity to rural living areas/detachment from main urban areas for the eastern areas and closer proximity to plantations for the western area. The southern edges of the urban areas generally defined by the Environmental Significance Overlay (ESO1) which identifies the coal buffer and these areas are not appropriate for urban development. There are some patches of Farming Zone outside of the coal buffer that abut existing urban areas and these may be considered as appropriate alternative locations. These areas do however present the same grassland interface as the subject site.

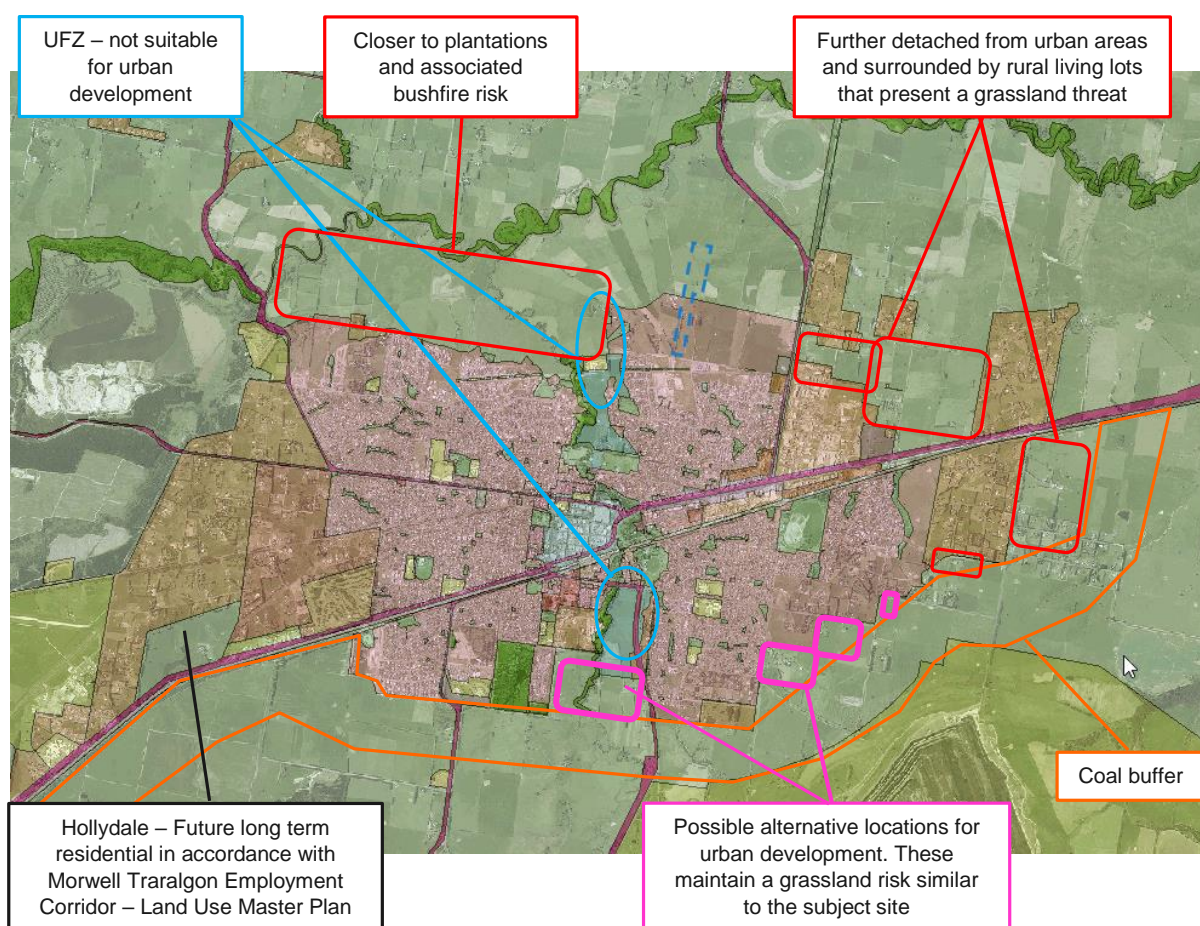


Figure 15: Town Scale - Alternative Locations

The area of land to be rezoned is small and the number of additional dwellings that it has potential to introduce is limited. The future allotments abut existing developing urban areas that already have an interface with grassland hazard and addition of a single row of residential allotments is not considered to be a substantial strategic decision, rather a minor procedural matter.

It is reasonable to consider the subject land as an area where directing new development at the scale proposed is sensible.

BIODIVERSITY VALUES

This report is not a biodiversity assessment as this goes beyond the scope, however based on a review of site conditions and EVC mapping it appears that there are no biodiversity factors likely to impact on the implementation of bushfire protection measures.

BUSHFIRE PRONE AREA

Any future subdivision application for the land to be rezoned will need to address the requirements of AS3959 under the requirements of the *Building Act 1993* in relation to Bushfire Prone Areas. The land to be rezoned is of sufficient depth to cater for BAL 12.5 construction.

10 FIRE AUTHORITY LIASION

Latrobe City Council have advised that they have sent an informal referral to the CFA however a response had not been received at the time of this report being written.

Millar Merrigan met with CFA Manager Community Safety, Jude Kennedy and CFA Land Use Planning Coordinator, Anne Coxon on 1 October 2019 to undertake preliminary discussions in relation to the proposed rezoning.

In light of the surrounding area being dominated by grassland there did not appear to be any fundamental issue raised with the rezoning of the additional strip of land, however it was suggested that a subdivision application run concurrently with the rezoning in accordance with Section 96A of the Planning and Environment Act. This would provide clarity on the final subdivision outcome and allow measures to implement bushfire protection to be applied. We advised that the application was prepared as a Section 20(2) amendment in accordance with Council recommendations as this allowed a fast track procedure.

The indicative subdivision layouts (Appendix 2) were tabled to show the likely outcome of a future subdivision applications and a summary of the discussion based on our interpretation is provided as follows:

- The lots have a deep enough profile to accommodate BAL-12.5 construction from a northern aspect (being 22m);
- CFA prefer that defendable space (or at least the majority of) be within Council managed land rather than relying on individual land holders;
- How will the abutting grassland be managed given it remains in Farming Zone and in private ownership? Creation of Council reserve with a fire access track may be an appropriate response;
- The grassland interface between the future residential lots and undeveloped areas to the sides doesn't appear to have been considered with the indicative subdivision layouts;
- In the absence of a combined rezoning and subdivision application, how will bushfire protection measures be implemented? Application of a Design and Development Overlay that specifies the outcomes for construction and vegetation management may be an appropriate response.

The sketches at Figures 16 and 17 provide a visual representation of potential options to address bushfire risk.

Formal comment from CFA will obviously be provided once official referral from Latrobe City Council has occurred.

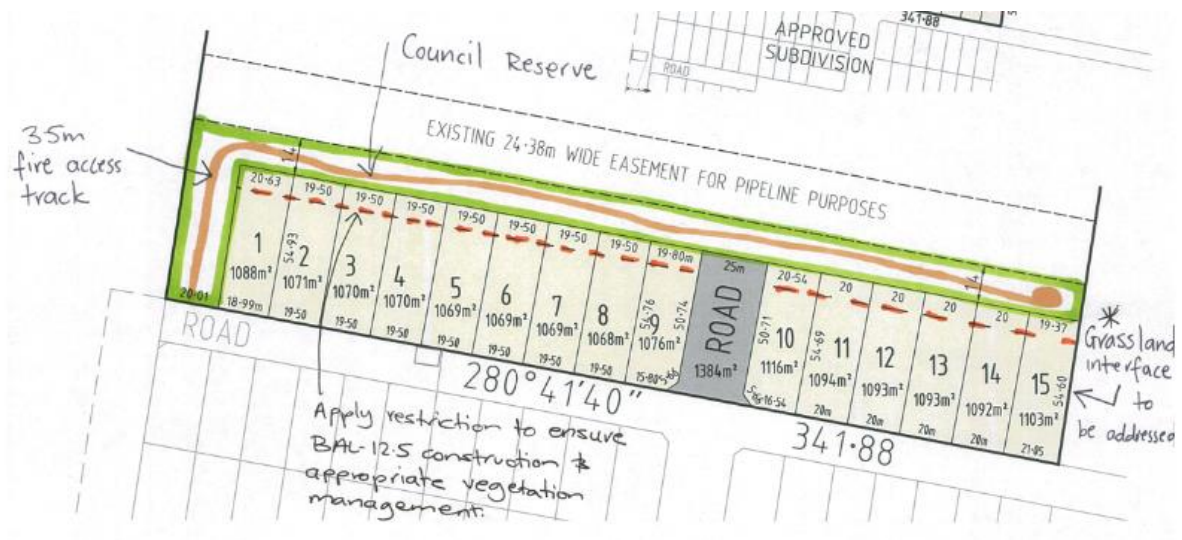


Figure 16: Sketch Plan - 50 Glendale Rd and 110A Marshalls Road



Figure 17: Sketch Plan - Lot B Traralgon-Maffra Road

11 CONCLUSION AND RECOMMENDATIONS

Integrated Decision Making (71.02-3) requires planning and responsible authorities to prioritise the protection of human life over all other policy considerations in bushfire affected areas. *Bushfire Planning (Clause 13.02)* outlines the objective to be achieved and this seeks to strengthen the resilience of settlements and communities to bushfire risk based planning that prioritises protection of human life.

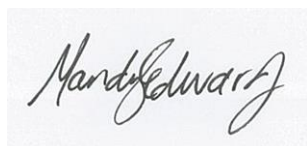
The landscape risk can be mitigated to an acceptable level as a result of the proposed rezoning and the subject site benefits from the existing BAL-LOW areas of Traralgon. Credible shelter options are available in close proximity to the land and provide for an important feature in the aim to protect life. Access to these areas is readily available and there are no biodiversity issues.

The site assessment determines that the land to be rezoned can be developed to BAL-12.5 requirements in accordance with *Clause 13.02* and that consideration will need to be given to grassland risk to the north, east and west as appropriate.

The location of the proposed rezoning is consistent with the Traralgon-Morwell Growth Area Framework Plan and there are no alternative locations identified that are considered to have a reduced bushfire risk.

It is recommended that Council proceed with notification of the planning scheme amendment and undertake subsequent liaison with CFA to discuss appropriate methods in achieving implementation of bushfire protection measures.

Millar | Merrigan



MANDY EDWARDS

Planning manager

BAPSc. Town Planning & Urban Design

Development & Building in Bushfire Prone Areas (UTS)

t 03 8720 9534

e medwards@millarmerrigan.com.au



APPENDIX 1: SUBDIVISION PLANS



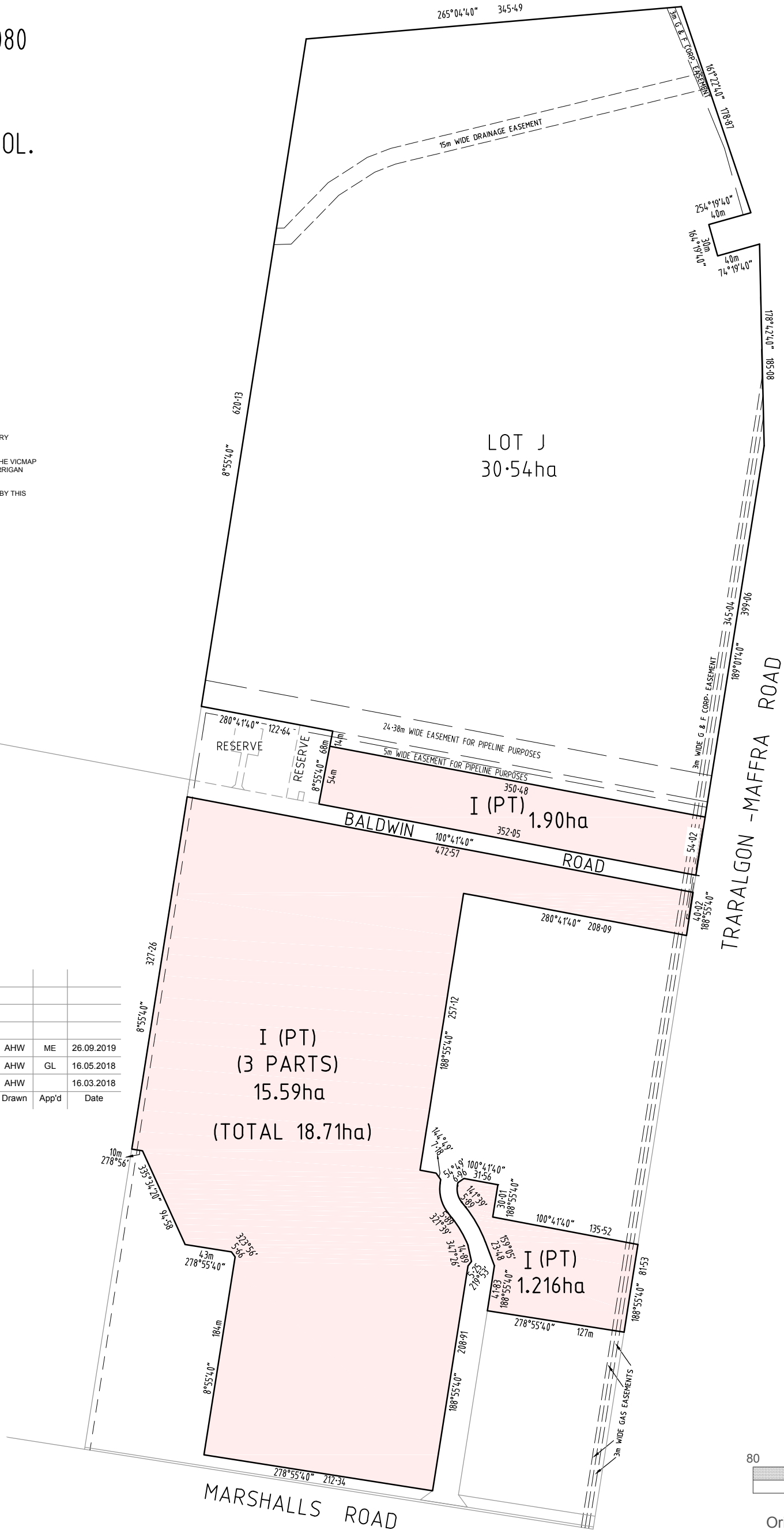
LOT C ON PS729262E
 C/T: VOL.12150 FOL.080
 AREA:16.81ha
 LOT C ON PS821062Y
 C/T: VOL. FOL.
 AREA:32.44ha

DIMENSIONS HEREON ARE SUBJECT TO SURVEY.

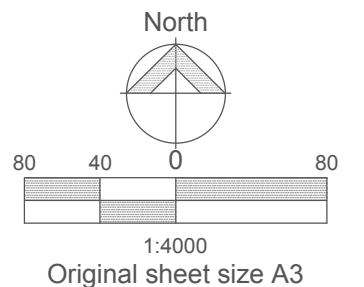
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THE ACCURACY OF THIS INFORMATION HAS NOT BEEN VERIFIED BY THIS OFFICE.



No.	Revision Description	Drawn	App'd	Date
3	Adjustment to depth of lots	AHW	ME	26.09.2019
2	Adjustment to boundary	AHW	GL	16.05.2018
1	Prepared for town planning purposes	AHW		16.03.2018



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Civil Engineering
 Land Surveying
 Landscape Architecture
 Project Management
 Town Planning
 Urban Design
 SAI GLOBAL Quality ISO 9001

Millar & Merrigan Pty Ltd ACN 005 541 668
 Metro 2/126 Merrindale Drive, Croydon 3136
 Regional 156 Commercial Road, Morwell 3840
 Mail PO Box 247 Croydon, Victoria 3136
 M(03) 8720 9500 R(03) 5134 8611
 www.millarmerrigan.com.au
 survey@millarmerrigan.com.au

PROPOSED SUBDIVISION PLAN

PROPERTY DESCRIPTION

TRARALGON-MAFFRA ROAD, TRARALGON
 LATROBE CITY COUNCIL

21783 LOT I





VERSION 3
 SHEET 1 OF 1

FOR APPROVAL

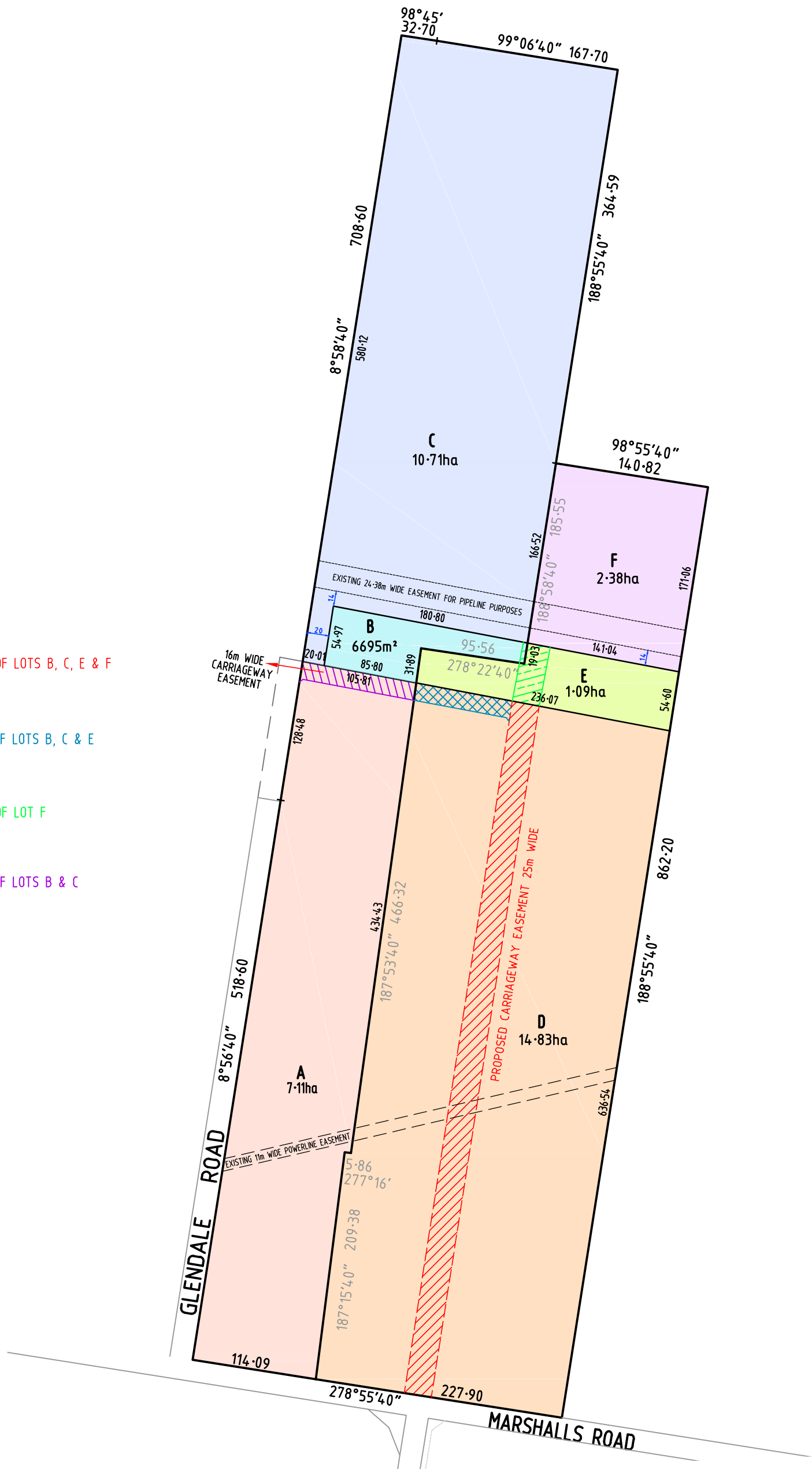
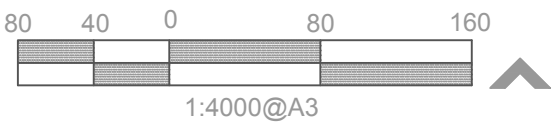
Land Development Consultants

LOTS 1 & 2 ON PS329021J
 VOL.10150 FOL. 467 & 468
 AREA LOT 1 = 18.49ha
 AREA LOT 2 = 18.30ha

TOTAL AREA : 36.79ha

-  PROPOSED 25m WIDE CARRIAGEWAY EASEMENT IN FAVOUR OF LOTS B, C, E & F
-  PROPOSED 16m WIDE CARRIAGEWAY EASEMENT IN FAVOUR OF LOTS B, C & E
-  PROPOSED 25m WIDE CARRIAGEWAY EASEMENT IN FAVOUR OF LOT F
-  PROPOSED 16m WIDE CARRIAGEWAY EASEMENT IN FAVOUR OF LOTS B & C

NOTES:
 DIMENSIONS HEREON ARE SUBJECT TO SURVEY.
 THIS PLAN IS SUBJECT TO THE APPROVAL OF VARIOUS STATUTORY AUTHORITIES.
 IMPLIED EASEMENTS UNDER SECTION 12 (2) OF THE SUBDIVISION ACT 1988 TO APPLY TO ALL OF THE LAND IN THE PLAN.
 LOTS B & E SUBJECT TO REZONING APPLICATION. LOTS A & D ARE GENERAL RESIDENTIAL, WHILST LOTS C & F WILL REMAIN FARMING ZONE.



2	Prepared for town planning purposes	AHW	ME	15.09.2019
1	Plan prepared per council request	AHW		01.07.2019
No.	Revision Description	Drawn	App'd	Date

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PROPOSED SUBDIVISION PLAN

PROPOSED SUBDIVISION
 50 Glendale Road, & 110A Marshalls Road,
 Traralgon Victoria
 Latrobe City Council
 21783P5 Version 2
 Date : Sept 2019



Millar & Merrigan Pty Ltd ACN 005 541 668
Metro 2/126 Merrindale Drive, Croydon 3136
Regional 156 Commercial Road, Morwell 3840
Mail PO Box 247 Croydon, Victoria 3136
T (03) 8720 9500 **F** (03) 8720 9501
Ausdoc DX 13608 Croydon
 admin@millarmerrigan.com.au
 millarmerrigan.com.au

NBA Group Pty Ltd ABN 194 748 327 43
Morwell 156 Commercial Road, 3840
Sale 10 Dawson Street, 3850
Mail P O Box 1170, Sale 3850
M 0418 402 240 **T** (03) 5143 0340
F (03) 5143 1244
 nick@nbagroup.com.au
 nbagroup.com.au

APPENDIX 2: INDICATIVE SUBDIVISION PLANS



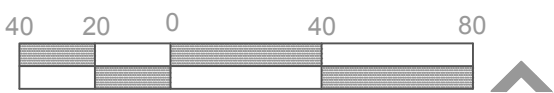
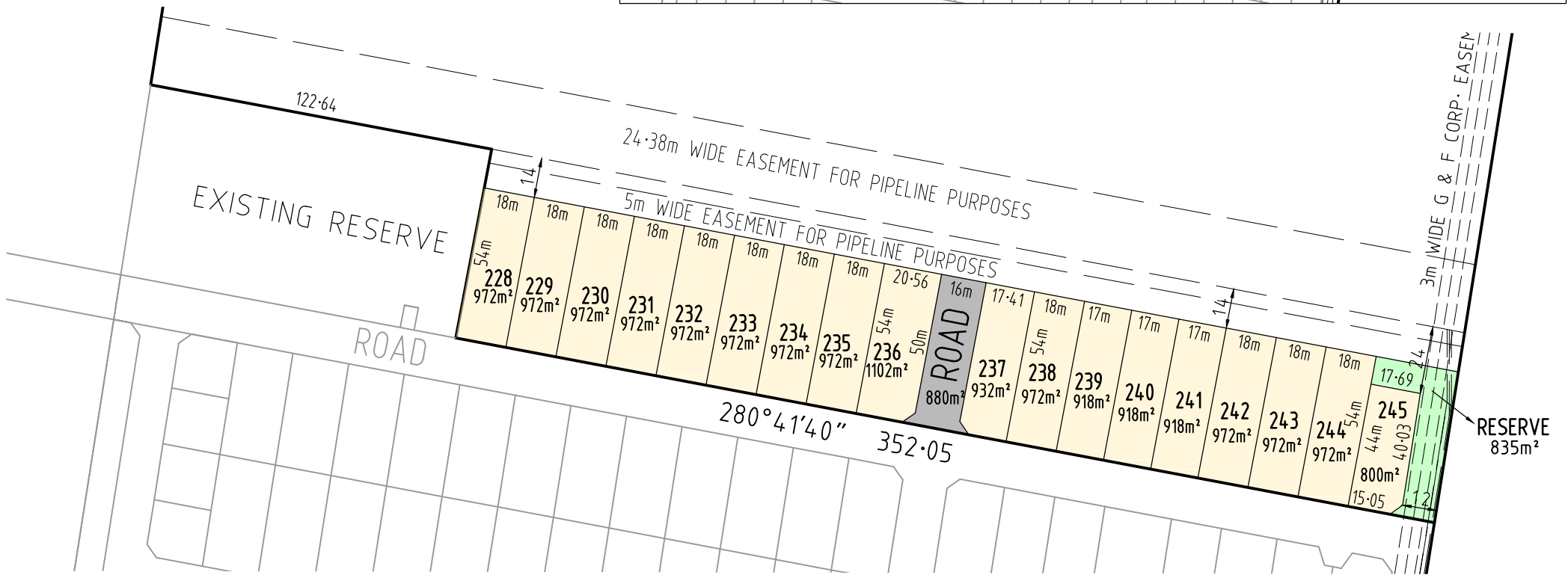
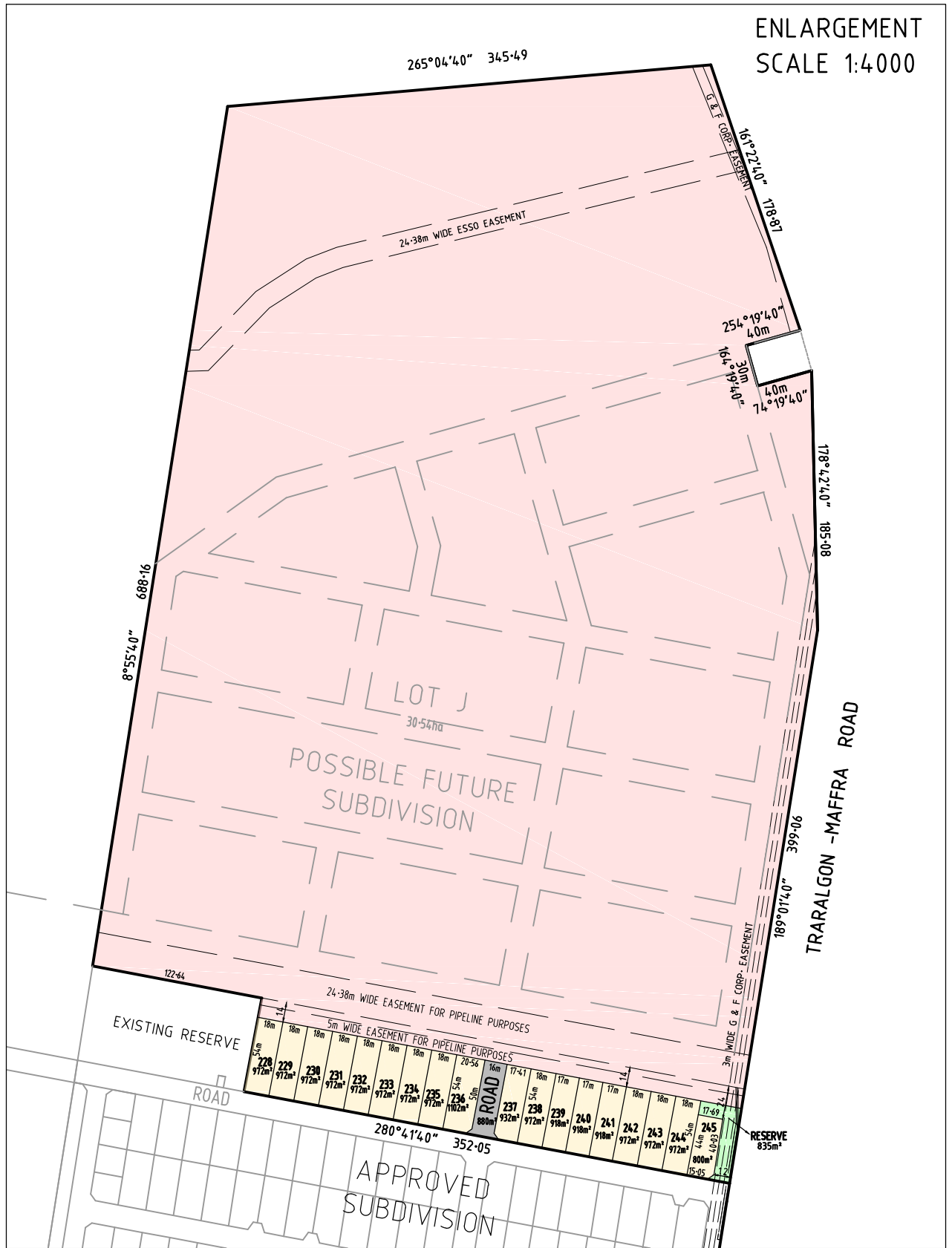
(PART) LOT I
VOL. FOL.
AREA: 1.90ha (PT)

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DRAFT



1:2000@A3
Original sheet size A1

No.	Revision Description	Drawn	App'd	Date
5	Increase strip lots by 20m	AHW		13.09.2019
4	Change lot layout to include road	AHW		03.09.2019
3	Change lot numbers	AHW		16.05.2018
2	Change position of sub-station	AHW		14.03.2018
1	Plan prepared for discussion purposes	AHW		12.12.2017

FOR DISCUSSION

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INDICATIVE SUBDIVISION PLAN

PROPOSED SUBDIVISION
Traralgon-Mafra Road, Traralgon Victoria
Latrobe City Council
21783P2 Version 5

Date: Sept 2019

Millar & Merrigan Pty Ltd ACN 005 541 668
Metro 2/126 Merrindale Drive, Croydon 3136
Regional 156 Commercial Road, Morwell 3840
Mail PO Box 247 Croydon, Victoria 3136
T (03) 8720 9500 **F** (03) 8720 9501
Ausdoc DX 13608 Croydon
admin@millarmerrigan.com.au
millarmerrigan.com.au

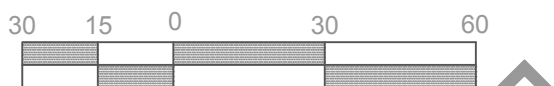
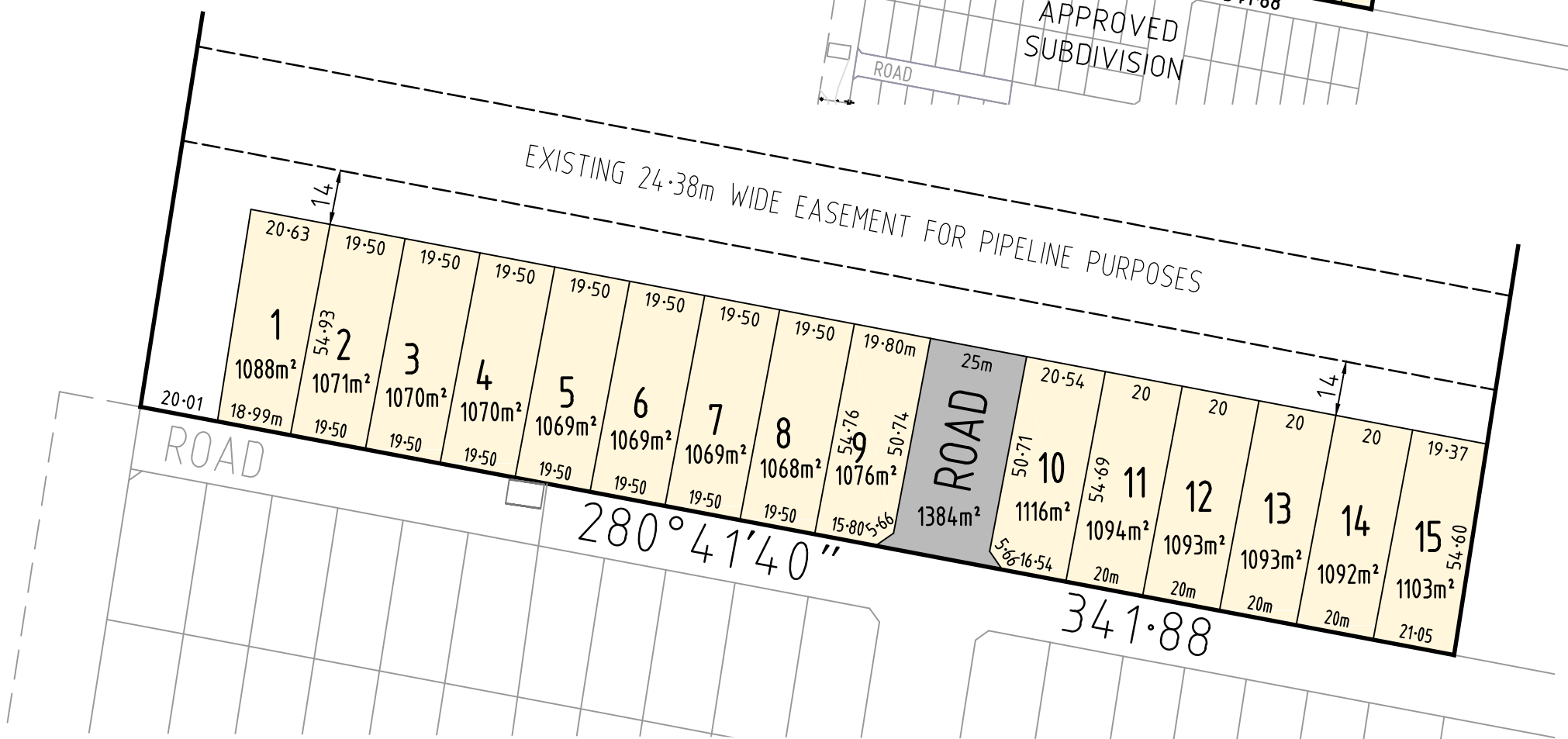
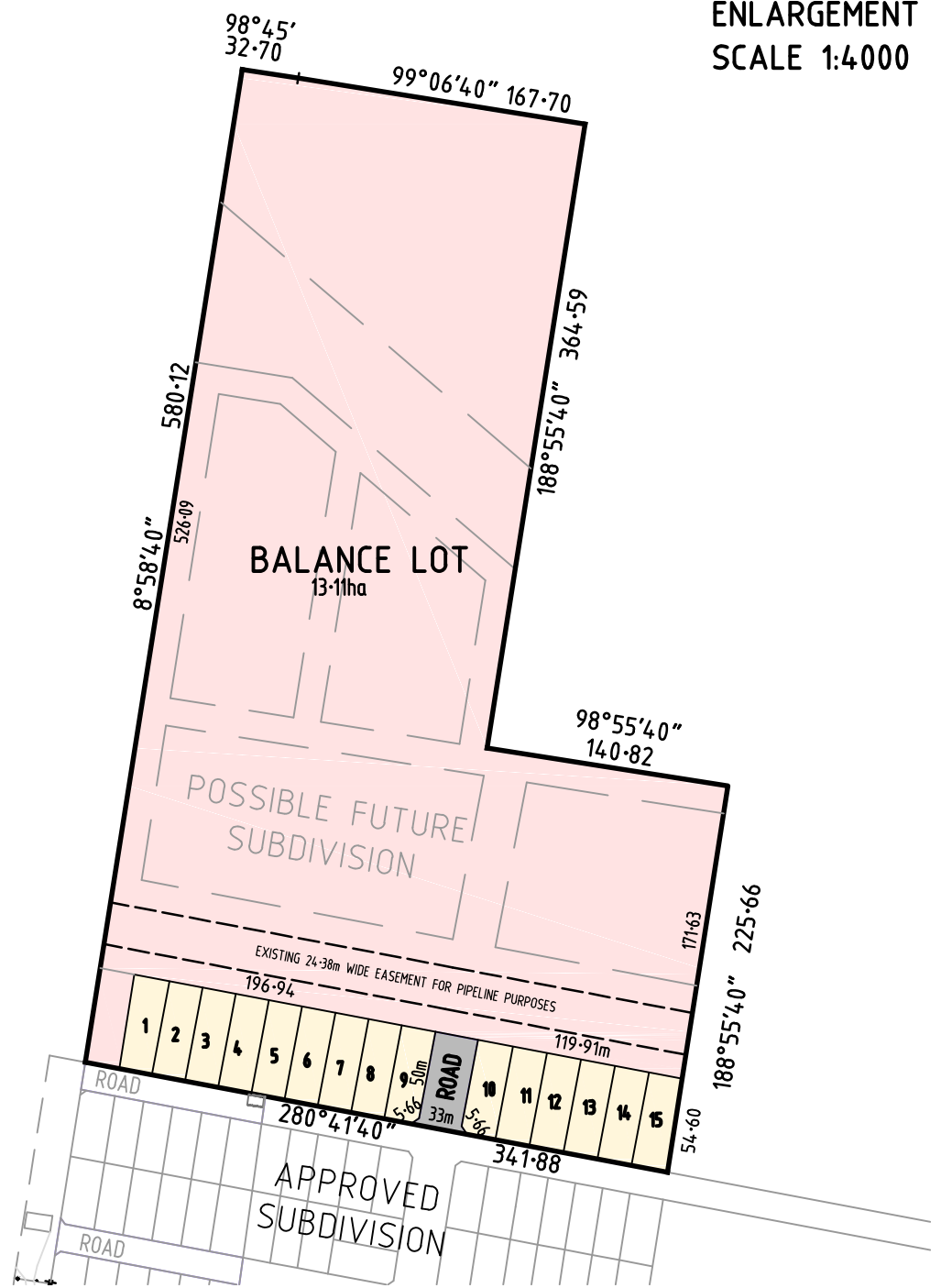
NBA Group Pty Ltd ABN 194 748 327 43
Metro Level 1, 1 Queens Road, Melbourne, 3004
Regional 382 Raymond Street, Sale, 3850
Mail 156 Commercial Road, Morwell 3840
M 0418 402 240 **T** (03) 5143 0340
F (03) 5143 1244
nick@nbagroup.com.au
nbagroup.com.au



LOTS B, C, E & F
TOTAL AREA: 1.76ha

ENLARGEMENT
SCALE 1:4000

DRAFT



1:1500@A3
Original sheet size A1

No.	Revision Description	Drawn	App'd	Date
3	Increase strip lots by 20m	AHW		13.09.2019
2	Change lot layout to include road	AHW		03.09.2019
1	Plan prepared for discussion purposes	AHW	BB	28.06.2018

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INDICATIVE SUBDIVISION PLAN

PROPOSED SUBDIVISION
Glendale Road, Traralgon Victoria
Latrobe City Council
21783P3 Version 3

Date : Sept 2019

Millar & Merrigan Pty Ltd ACN 005 541 668
Metro 2/126 Merrindale Drive, Croydon 3136
Regional 156 Commercial Road, Morwell 3840
Mail PO Box 247 Croydon, Victoria 3136
T (03) 8720 9500 **F** (03) 8720 9501
Ausdoc DX 13608 Croydon
admin@millarmerrigan.com.au
millarmerrigan.com.au

NBA Group Pty Ltd ABN 194 748 327 43
Metro Level 1, 1 Queens Road, Melbourne, 3004
Regional 382 Raymond Street, Sale, 3850
Mail 156 Commercial Road, Morwell 3840
M 0418 402 240 **T** (03) 5143 0340
F (03) 5143 1244
nick@nbagroup.com.au
nbagroup.com.au



APPENDIX 3: VFRR INFORMATION

ASSETNAME	Traralgon Interface
ADDRESS	Traralgon
TENURE	Private
PRIORITY	3D
VULNERABIL	Low
CONSEQUENC	Minor
LIKELIHOOD	Almost certain
RISKCRATING	High
NOTES	Arson in area 100m fringe
THREAT	Medium
FREQUENT	Yes
SPREAD	Yes
CAPTUREDDA	2011/09/28
CAPTUREDBY	calder
VEGETATION	22
LGAs	40
Asset Clas	Human Settlement
Asset Subc	1
Separation	2
Assessed b	1
Agency Rep	

Hazard Imp	9
Impact Dir	9
AssetID	40015
TREATMENT	100, 222, 303
Shape Leng	0.71838030851
Shape Area	0.00102378211
d TENURE	
d VEGETATI	Grassland : >0-5 Degrees
d LGAs	Latrobe
d Asset Su	Residential
d Separati	20-60m
d Assessed	Working Group
d Hazard I	Smoke Impact + Direct Flame (Grassland)
d Impact D	Surrounds

(source: Latrobe City Council)