



Terramatrix project: LaTrobeCC-2018-01 Amendment C105

Cover image: Google Earth imagery of the Latrobe City Council LGA

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1 Preface

1.1 Expert Witness Details

1.1.1 Name and address

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1.1.2 Qualifications

- Bachelor of Applied Science in Environmental Assessment and Land Use Policy, 1990,
 Victoria College.
- Graduate Diploma in Bushfire Protection, 2014, University of Western Sydney.
- Level 3 Accredited Bushfire Practitioner Bushfire Planning and Design, Fire Protection Association Australia (FPAA) Accreditation Number BPAD29090.

1.2 Area of expertise

Bushfire planning and design.

1.3 Skills and experience

I have over 25 years experience in land use planning (environmental, strategic and statutory planning), environmental management and bushfire planning including as a Park Ranger and Environmental Planner for State and local governments.

My role at Terramatrix includes managing the Terramatrix Bushfire Planning and Design (BPAD) team. This includes leading and undertaking bushfire risk assessments for strategic planning projects such as precinct structure plans, producing Bushfire Management Statements and other bushfire development reports for residential and commercial developments, subdivisions and planning scheme amendments.

I am a Victorian bushfire practitioner accredited by the Fire Protection Association Australia (FPAA) in association with the Country Fire authority (CFA) and Department of Environment, Land, Water and Planning (DELWP) to provide Level 3 Bushfire Planning and Design (BPAD) services.



I am a guest lecturer in Bushfire Planning and Design for University of Melbourne - Bushfire Urban Planning and have presented on the Victoria University Graduate Certificate in Performance Based Building and Fire Codes. I have also provided sessional training services for a range of clients including the Planning Institute of Australia PLANET course - Preparing and Assessing a Bushfire Management Statement.

I am regularly called upon to provide expert evidence about bushfire safety and compliance for Planning Panels and at VCAT.

1.4 Instructions and scope of this report

I have been engaged by Latrobe City Council and instructed by Nathan Misiurka, Senior Strategic Planner, to review 'Part B' of the document titled 'Assessment of Matters Relating to Bushfire Risk, Management and Planning', and provide expert advice about the bushfire aspects of polices and provisions that are part of Amendment C105 to the Latrobe Planning Scheme.

My instructions have been to read, review and comment on Part B of the document and prepare an Expert Witness Statement about how the Amendment addresses bushfire risk, specifically in relation to *Clause 13.02 Bushfire* in the Latrobe Planning Scheme.

I have also been instructed that I may be asked to appear as an expert witness at the Panel hearing for Amendment C105.

The information in this report has been prepared and is provided in accordance with the 'Guide to Expert Evidence' published by Planning Panels Victoria (PPV, 2015).

A reference list of documents referred to is provided at the end of the report.

1.5 Client relationship

I was engaged in October 2018 by Latrobe City Council to provide expert bushfire planning advice. My relationship with the client is a standard commercial one and no private, personal or other matter has influenced the content or findings of this statement.

' I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Panel '.

Hamish Allan

Manager - Bushfire Planning and Design Terramatrix Pty. Ltd. 2nd November 2018.





2 Introduction

This report has been prepared for Latrobe City Council, as expert evidence about how Amendment C105 to the Latrobe Planning Scheme, addresses bushfire risk in relation to *Clause 13.02 Bushfire* in the Latrobe Planning Scheme (Latrobe Planning Scheme, 2018a). The report comprises a review of the bushfire aspects of 'Part B' of the document titled 'Assessment of Matters Relating to Bushfire Risk, Management and Planning' (October 2018 v.1), which has been prepared by Latrobe City Council (Latrobe City Council, 2018a). Part B comprises the proposed planning scheme policies and provisions that are part of Amendment C105.

The report has been prepared in accordance with guidance provided in:

- Bushfire State Planning Policy Amendment VC140, Planning Advisory Note 68, (DELWP, 2018); and
- Local planning for bushfire protection, Planning Practice Note 64 (DELWP, 2015).

2.1 Background

Amendment C105 was exhibited from 22 March to 11 May 2018 (Latrobe City Council, 2018b) and is proceeding to a planning panel. The Amendment aims to implement the key recommendations of the 'Live Work Latrobe' project, which comprises three major land use strategies:

- Housing Strategy;
- Industrial and Employment Strategy; and
- Rural Land Use Strategy (Latrobe City Council, undated).

The Amendment applies to the majority of the municipality, and primarily affects land by the application of new zone schedules, rezoning of land and the introduction of policy objectives and directions for the use and development of land located within the:

- Residential Zone;
- Rural Living Zone;
- Farming Zone;
- Industrial Zone; and/or covered by
- Development Plan Overlay Schedule 5 and 6 (Latrobe City Council, undated).

In response to the Planning Policy Framework regarding bushfire risk (as introduced by Amendment VC140 in December 2017), and following consultation with CFA and consideration of their submission to the exhibited Amendment (received June 2018); Latrobe City Council prepared the assessment of bushfire risk and policy as it relates to the exhibited Amendment and identified a series of post exhibition edits for consideration by the Panel.



The author has been involved in further consultation with the CFA and provided comments and recommendations regarding the proposed planning provisions, to address CFA concerns and appropriately address bushfire matters in the Amendment.



3 Assessment of bushfire content in the C105 provisions

NOTE: text highlighted in yellow is suggested additions/wording changes to exhibited ordinance.

Clause	Name	Bushfire content	Assessment and comment
21.03 (MSS)	Environmental and Landscape	At 21.03-7, Strategy 2.1 is to:	Suggest amending to acknowledge bushfire risk may
	Values	'Encourage the development of wildlife corridors and links	need to be considered:
		across the municipality'.	Encourage the development of wildlife corridors and
			links across the municipality, subject to any resultant
			increase in bushfire risk to existing residents and
			infrastructure being assessed and able to be acceptably
			mitigated.
			Suggested change:
		At 21.03-10, Strategy 1.8 is to:	Ensure that the enhancement of biodiversity outcomes,
		'Ensure that bushfire protection measures and management	including the establishment of a potential biodiversity
		is considered as a priority in the enhancement of	corridor, considers bushfire risk and does not pose an
		biodiversity outcomes, including the establishment of a	unacceptable increase in risk to existing residents and
		potential biodiversity corridor'.	infrastructure.
21.04 (MSS)	Environmental Risks	At 21.04-1 Greenhouse and Climate Change, suggest adding	
		a dot point to key impacts of climate change:	
		 A likely increase in the frequency and severity of days of elevated fire danger. 	
		At 21.04-12 Bushfire: 'Municipal Fire Management Plan 2017-2021' should this be the Latrobe City Fire Management Plan 2017-2020?	The name of the most current version of the Municipal Fire Management Plan is inconsistent in various places in the proposed provisions e.g. see 21.10 below.
		Suggest an introduction paragraph: 'Like many local government areas in Victoria, large areas of the municipality are prone to bushfire. The highest risk areas, where bushfire behaviour may be extreme, including	The intention is to state that whilst bushfire is a recognised risk, this is common to many LGAs and the planning and building systems are considered to be appropriate to deal with it.



Name	Bushfire content	Assessment and comment
	the possibility of crown fire, extreme ember attack and	
	significant radiant heat, are subject to the Bushfire	I consider a local bushfire policy is only warranted if or
	Management Overlay. High hazard areas include rural	where the particular bushfire hazards and
	residential areas in the vicinity of the foothills of the	characteristics in Latrobe are unique enough to justify
	Strzelecki Ranges and southern fall of the Alpine Ranges,	particular bushfire policy above and beyond the state
	where development could be exposed to long bushfire runs	planning and building controls, or where there is
	through very high fuel hazard forest vegetation.	insufficient clarity in the state provisions. The hazard
		assessment being undertaken by other consultants
	Grassland fires, and fires in bushland reserves and	should provide the basis for identifying higher risk
	plantations, also pose a risk to development across the	areas and then deciding if a local policy is required.
	municipality.	
		The intent here is to say Latrobe will have confidence in
	The risk can be managed through the planning and building	and apply the state's planning and building controls
	system by ensuring statutory compliance in BMO areas,	that relate to bushfire, and that the development
	compliance with the building regulations in Bushfire Prone	response should be commensurate with the risk i.e. in
	Areas (BPA) outside of the BMO; and, for strategic planning	BMO areas, let the BMO work as designed to manage
	and larger or more vulnerable developments, requiring	the risk for development applications. In the BPA,
	consideration of bushfire risk as at Clause 13.02 Bushfire'.	outside the BMO, some guidance could be given for
		those larger and or more vulnerable developments as
	Strategies:	identified at Clause 13.02, about how they should
	1. Ensure the application of, and compliance with, the BMO,	appropriately identify and respond to the risk, as per
	in highest risk parts of the municipality.	wording proposed.
	2. Outside of the BMO, in BPA parts of the municipality:	
	 Ensure new development and uses are appropriately 	
	located and designed in response to the bushfire	
	<mark>hazard.</mark>	
	Name	the possibility of crown fire, extreme ember attack and significant radiant heat, are subject to the Bushfire Management Overlay. High hazard areas include rural residential areas in the vicinity of the foothills of the Strzelecki Ranges and southern fall of the Alpine Ranges, where development could be exposed to long bushfire runs through very high fuel hazard forest vegetation. Grassland fires, and fires in bushland reserves and plantations, also pose a risk to development across the municipality. The risk can be managed through the planning and building system by ensuring statutory compliance in BMO areas, compliance with the building regulations in Bushfire Prone Areas (BPA) outside of the BMO; and, for strategic planning and larger or more vulnerable developments, requiring consideration of bushfire risk as at Clause 13.02 Bushfire'. Strategies: 1. Ensure the application of, and compliance with, the BMO, in highest risk parts of the municipality. 2. Outside of the BMO, in BPA parts of the municipality: • Ensure new development and uses are appropriately located and designed in response to the bushfire



Clause	Name	Bushfire content	Assessment and comment
		 For subdivisions of more than 10 lots, a lot layout that responds to the risk and incorporates a perimeter road and two ways in and out of the development where possible; A construction standard no higher than BAL-29 unless there are significant siting constraints, with commensurate vegetation management for defendable space; A reliable water supply for property protection and fire fighting; Adequate access for emergency management vehicles; and Development of a Bushfire Emergency Management Plan (BEMP) as appropriate, including triggers for closure or restricted operation on days of elevated fire danger. Ensure the alignment of, and consistency between, planning policy and practices, and the Latrobe City Municipal Fire Management Plan. 	
21.10 (MSS)	Application of Zones and Overlays	At 21.10-1 Overlays: 'Apply the Bushfire Management Overlay to bush fire prone areas where there is potential for extreme bushfire behaviour, consistent with state hazard criteria and mapping'. At 21.10-2 Further strategic work: 'Prepare a Bushfire Management Strategy for the city in partnership with the CFA to effectively manage those settlement areas across Latrobe City with a high fire risk	As per Advisory note 46, only extreme hazard areas within the BPA should have the BMO applied. Consider mentioning potential for BMO schedules where appropriate. Is this not the Bushfire Risk Assessment that other consultants are currently undertaking? What does 'High fire risk rating' mean? Suggest the wording, need for and intent of this
		rating'. At 21.10-3 Reference documents: Municipal Fire Management Plan (2013-2016)	strategy be clarified. Need to use consistent nomenclature/references to the Municipal Fire Management Plan.



Clause	Name	Bushfire content	Assessment and comment
22.02 (LPP)	Rural Dwelling and Subdivision in the Farming Zone	Proposed policy at 22.02-2 (FZ2): 'A BAL assessment must be provided in a bushfire prone area'	Why only in FZ2 and not FZ1? Note that not all classes of building require a BAL. Suggested alternative wording: New dwellings or other buildings requiring a BAL, should demonstrate that they will be sufficiently setback from any bushfire hazard to achieve a BAL no higher than BAL-29, unless there are significant siting constraints, in accordance with AS 3959 Construction of buildings in bushfire prone areas.
22.03 (LPP)	Rural Tourism in the Farming Zone	At 22.03-1 <i>Objectives</i> , suggest insert a bushfire objective	May need a point in the application requirements about what is to be submitted to show BAL compliance and a supporting decision guideline.
		such as: 'To ensure buildings and uses in a bushfire prone area appropriately respond to any identified bushfire risk.'	
		 At 22.03-2 Policy for FZ1 and FZ2 areas, suggest policy that: New dwellings or other buildings requiring a BAL, should demonstrate that they will be sufficiently setback from any bushfire hazard to achieve a construction standard no higher than BAL-29, unless there are significant siting constraints, in accordance with AS 3959 Construction of buildings in bushfire prone areas. In a BPA outside the BMO, a tourism development application involving accommodation for persons not normally resident on a site (i.e. other than for a dwelling or dependent persons unit) must prepare a bushfire risk assessment report for the development, which will be referred to the CFA for comment, showing how any identified bushfire risk will be acceptably mitigated'. 	



Clause	Name	Bushfire content	Assessment and comment
		Application requirements:	
		A bushfire risk assessment report for a tourism development	
		must be prepared by a suitably qualified or experienced	
		bushfire practitioner, and show:	
		 Siting of buildings that responds to the hazard such that buildings can achieve no higher than a BAL-29 unless there are significant siting constraints; Adequate access for emergency services; An adequate water supply for fire fighting and property protection; and A Bushfire Emergency Management Plan (BEMP) detailing emergency management arrangements and procedures for the site on days of elevated fire danger. Decision Guidelines: The views of the relevant fire authority. Whether any identified bushfire risk can be acceptably mitigated in an ongoing capacity, for the life of the development. 	



4 Evaluation of Amendment C105 against *Clause 13.02 Bushfire*

The following sub-sections provide a summary of how the Amendment responds to the objectives and strategies for bushfire safety in the PPF at Clause 13.02.

4.1 Protection of human life strategies

Clause 13.02 requires that the priority be given to protection of human life.

Prioritising the protection of human life over all other policy considerations

It is considered that Amendment C105 has prioritised the protection of human life over all other considerations by:

- Commissioning an assessment of bushfire risk, management and mitigation in the Latrobe City LGA as part of the Amendment;
- Engaging an independent consultant to advise on how the proposed planning provisions appropriately incorporate bushfire risk;
- Adapting the Amendment based on CFA consultation and advice, including removing from the Amendment the proposed rezoning of some Farm Zone areas to Rural Living Zone (see Map 1), and commissioning further risk assessments of this aspect of the Amendment; and
- Ensuring that other policy considerations, such as the proposed biodiversity/wildlife corridor, consider bushfire risk and do not pose an unacceptable increase in risk to existing residents and infrastructure.

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.

A bushfire risk assessment of areas proposed for new or more intensive development is outside the scope of the author's engagement. However, it is noted that this work is being, or has been conducted, by other consultants. The author notes that most, if not all of the proposed housing framework areas that are identified for substantial or incremental change, are not covered by the BMO or are not designated as a Bushfire Prone Area (BPA) (see Map 1 - Extent of BMO and BPA coverage in Latrobe City Council.).

Reducing the vulnerability of communities to bushfire through consideration of bushfire risk in decision-making at all stages of the planning process

This and other consultant reports on bushfire risk, and ongoing consultation with the CFA during and post exhibition of the Amendment, demonstrate that bushfire risk is being appropriately incorporated into decision making associated with planning for development in areas affected by C105.



The CFA consider that community resilience to bushfire will be strengthened (and hence, presumably, vulnerability to bushfire will be reduced) when a strategic planning proposal demonstrates that Clause 13.02 strategies have been applied, and where a proposal takes advantage of existing settlement patterns so that new development will not expose the community to increased risk from bushfire.

The CFA provide principles to respond to Clause 13.02 including that settlement planning decisions should:

- 'Direct development to locations of lower bushfire risk.
- Carefully consider development in locations where there is significant bushfire risk that cannot be avoided.
- Avoid development in locations of extreme bushfire risk.
- Avoid development in areas where planned bushfire protection measures may be incompatible with other environmental objectives' (CFA, 2015).

It is considered that Amendment C105 can appropriately implement the strategies in Clause 13.02 that aim to prioritise protection of human life and will, therefore, also meet the CFA strategic planning principles for bushfire.

4.2 Bushfire hazard identification and assessment strategies

Clause 13.02-1 requires that the bushfire hazard be identified, and appropriate risk assessment be undertaken.

Applying the best available science to identify vegetation, topographic and climatic conditions that create a bushfire hazard.

A bushfire hazard assessment of areas proposed for new or more intensive development is outside the scope of the author's engagement. However, it is noted that this work is being, or has been conducted, by other consultants.

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.

Map 1 shows the current extent of BMO coverage of the Latrobe City Council LGA and identifies those parts of the municipality that are *outside* the designated Bushfire Prone Area (BPA), based on the most recent BPA mapping for the state, which was gazetted 16th October 2018. It appears that residential development will be directed to areas of lowest bushfire risk, wholly or almost wholly outside the BPA i.e. most if not all of the proposed housing framework areas that are identified for substantial or incremental change, appear to be outside the BPA and not covered by the BMO.



Applying the Bushfire Management Overlay in planning schemes to areas where the extent of vegetation can create an extreme bushfire hazard.

Current BMO coverage reflects relatively recent BMO mapping introduced into the Latrobe Planning Scheme by Amendment GC13, which was gazetted on 3rd October 2017 (see Map 1Error! Reference source not found.). Amendment C105 does not propose to change, nor has any significant implications for, current BMO coverage.

Considering and assessing the bushfire hazard on the basis of:

- Landscape conditions meaning the conditions in the landscape within 20 kilometres and potentially up to 75 kilometres from a site;
- Local conditions meaning conditions in the area within approximately 1 kilometre from a site;
- Neighbourhood conditions meaning conditions in the area within 400 metres of a site; and
- The site for the development.

A bushfire hazard assessment of areas proposed for new or more intensive development is outside the scope of the author's engagement. However, it is noted that this work is being, or has been conducted, by other consultants.

Consulting with emergency management agencies and the relevant fire authority early in the process to receive their recommendations and implement appropriate bushfire protection measures.

The author is aware of (and has been involved in recent) extensive consultation with the CFA about bushfire aspects of Amendment C105.

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.

DELWP advisory and practice notes, Clause 13.02, Clause 44.06, Clause 53.02 and the building regulations invoked by the BPA coverage, specify the general requirements and standards for assessing bushfire risk. It is noted that risk assessments are being, or have been conducted, by other consultants as part of the Amendment.

Section 3 of this report summarises how the proposed C105 provisions address bushfire risk.



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.

The risk can be deemed to be acceptably mitigated such that future development can proceed if the objectives and strategies of Clause 13.02 are successfully implemented as identified in this report, including BMO compliance where appropriate and, in the BPA, the building regulations. The proposed provisions provide further policy guidance as appropriate, especially in relation to more vulnerable development types.

The CFA specify that areas where development should not proceed could include:

- 'Isolated settlements where the size and/or configuration of the settlements will be insufficient to modify fire behaviour and provide protection from a bushfire.
- Where bushfire protection measures will not reduce the risk to an acceptable level.
- Where evacuation (access) is severely restricted.
- Where the extent and potential impact of required bushfire protection measures may be incompatible with other environmental objectives or issues, e.g. vegetation protection, land subject to erosion or landslip' (CFA, 2015).

Amendment C105 does not propose, nor encourage development in areas where these criteria or characteristics are likely to be applicable.

4.3 Settlement planning strategies

Clause 13.02 requires that settlement planning must strengthen the resilience of settlements and communities and prioritise protection of human life.

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).

An assessment of potential BAL-12.5 areas in relation to land affected by Amendment C105 is outside the scope of the author's engagement. However, as noted above, it appears that residential development will be directed to areas of lowest bushfire risk, wholly or almost wholly outside the BPA i.e. most if not all of the proposed housing framework areas that are identified for substantial or incremental change, appear to be outside the BPA and not be covered by the BMO. It is likely these areas can achieve BAL-12.5 compliance.



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.

Existing *lowest* risk locations, where BAL-LOW can be achieved, are those areas within the Latrobe LGA that are not a designated BPA (see Map 1). It is reasonable to assume that more intensive residential development that may result from Amendment C105 will create additional non-vegetated or low threat land, typical of most urban residential areas.

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 reduce bushfire risk overall.

The risk to existing residents is likely to be reduced by the development of additional low threat or non-vegetated land associated with the proposed future urban structure. Policy direction is proposed in the MSS to ensure bushfire risk is considered and appropriately mitigated where the enhancement of biodiversity outcomes, including the establishment of a potential biodiversity corridor, is encouraged.

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.

It is noted that risk assessments are being, or have been conducted, by other consultants as part of the Amendment.

Assessing alternative low risk locations for settlement growth on a regional, municipal, settlement, local and neighbourhood basis.

It is noted that risk assessments are being, or have been conducted, by other consultants as part of the Amendment.

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'

It is reasonable to assume that more intensive residential development that may result from Amendment C105 will create additional non-vegetated or low threat land, typical of most urban residential areas, where BAL-12.5 can be achieved. Buildings in non-BPA parts of the Latrobe LGA can be constructed to BAL-LOW (see Map 1).



4.4 Areas of high 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 of high biodiversity conservation value

The author is not aware of any apparent biodiversity impacts associated with Amendment C105. Policy direction is proposed in the MSS to ensure bushfire risk is considered and appropriately mitigated where the enhancement of biodiversity outcomes, including the establishment of a potential biodiversity corridor, is encouraged.

4.5 Use and development control in a Bushfire Prone Area

Clause 13.02 requires that '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' (Latrobe Planning Scheme, 2018a).

It further states that:

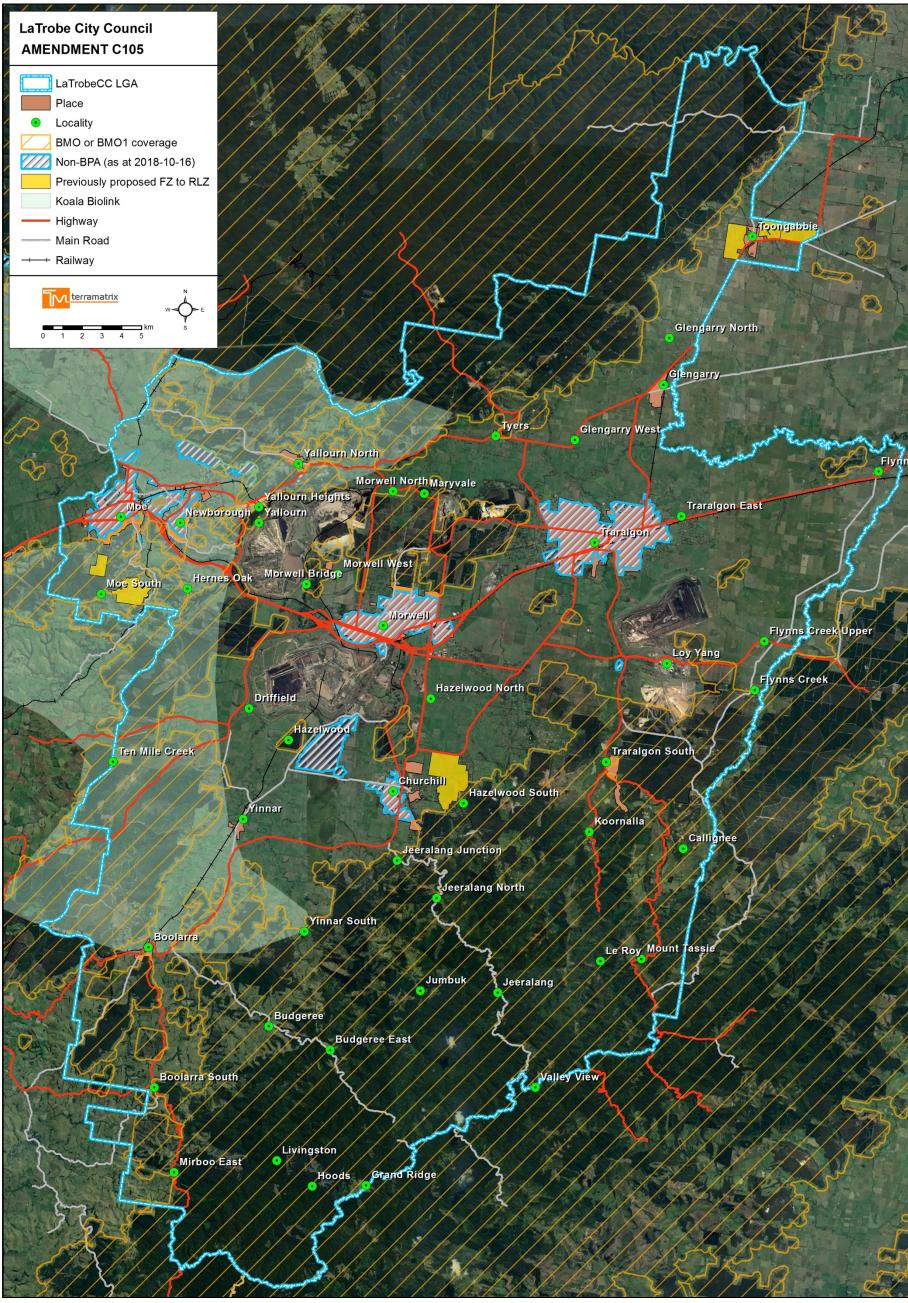
'When assessing a planning permit application for the above uses and development:

- 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' (Latrobe Planning Scheme, 2018a).

Future development applications in the BPA, can achieve acceptable bushfire safety if:

- Defendable space for future development is achieved to enable BAL-12.5 construction, or as appropriate, a higher standard if the risk justifies it and/or significant siting constraints exist;
- · Adequate access and egress for emergency management vehicles is provided; and
- A reliable water supply for fire-fighting is available.





Map 1 - Extent of BMO and BPA coverage in Latrobe City Council.



5 References

Latrobe Planning Scheme (2018) *Clause 13.02 Bushfire*. Available at http://planning-schemes.delwp.vic.gov.au/schemes/latrobe.

Latrobe City Council (2018a) Amendment C105 to the Latrobe Planning Scheme - Assessment of Matters Relating to Bushfire Risk, Management and Planning, October v1.0.

Latrobe City Council (2018b) *Amendment C105 - Live Work Latrobe* Latrobe City Council website viewed October 2018 at

.

Latrobe City Council (undated) Latrobe Planning Scheme Amendment C105 Explanatory Report.

CFA (2015) FSG LUP 008 Land Use Planning CFA Land Use Planning Fire Services Guideline. Country Fire Authority, East Burwood. Available at http://www.cfa.vic.gov.au/plan-prepare/strategic-planning/.

DELWP (2015) Local planning for bushfire protection, Planning Practice Note 64. Department of Environment, Land, Water and Planning, Melbourne. Available at https://www.planning.vic.gov.au/publications/planning-practice-notes.

DELWP (2018) *Bushfire State Planning Policy Amendment VC140,* Planning Advisory Note 68, Department of Environment, Land, Water and Planning, Melbourne. Available at https://www.planning.vic.gov.au/publications/planning-advisory-notes.

PPV (2015) *Guide to Expert Evidence* Planning Panels Victoria, Viewed October 2018 at https://www.planning.vic.gov.au/panels-and-committees/planning-panel-guides/planning-panel-faqs.