

This addendum has been prepared to respond to Points 8(c) – 8(f) in Version 3 of the Panel Directions.

8(c) Settlement Planning

The Strategic Bushfire Risk Assessment undertaken by the Golden Plains Shire Council and my Expert Evidence Report have been undertaken at a settlement scale. The bushfire landscape context and likely fire scenarios for Inverleigh have been identified in both documents. (Reference: SBRA P36-38 and Evidence Report P11). Bushfire mitigation measures to reduce the risk to an acceptable level are set out on Page 12 of the Expert Evidence Report. Subject to the implementation of these bushfire mitigation measures, the potential growth areas can be considered low risk locations for the purposes of state planning policy in relation to bushfire planning as set out in Clause 13.02-1S which is a fundamental requirement of state planning policy for approving any strategic planning document, local planning policy, or planning scheme amendment.

The bushfire risk to the Inverleigh Township is comparable with other small towns within the Golden Plains Shire and many other areas of rural Victoria. The limitation of development within the Inverleigh Township in favour of another township would not contribute to a reduction in the overall bushfire risk at a landscape scale. In the context of the Inverleigh Structure Plan, the key question to be addressed in relation to the potential growth area is whether development is being directed to a low risk location where a bushfire attack level of BAL12.5 can be achieved for the construction of future dwellings. If it is not, then the potential growth area should not be developed for residential purposes. As set out above, development within the proposed growth areas is considered to be a low risk location as bushfire mitigation measures can be implemented which can achieve a separation distance sufficient to achieve a radiant heat flux of 12.5 kilowatts/square metre under AS3959 consistent with state planning policy.

8(d) Bushfire Hazard Identification and Assessment

The Strategic Bushfire Risk Assessment undertaken by the Golden Plains Shire Council and my Expert Evidence Report have considered the Bushfire Management Overlay under the planning scheme and designated Bushfire Prone Areas under the Building Regulations 2018. The bushfire risk has been considered at a landscape and local scale for the Inverleigh Township and the potential growth areas.

Consultation has occurred with the Country Fire Authority and in its submission to Amendment C87gpla, the CFA has supported the amendment in its current form. In its submission, the CFA has said bushfire risk should be reduced to acceptable levels in identified potential growth areas through the implementation of appropriate bushfire mitigation measures.

Bushfire mitigation measures are contained within the Inverleigh Structure Plan and amendments to these measures are recommended within my Expert Evidence Report. These are consistent with the measures identified by the CFA.

8(e) Climate Change

Arguably the changes to state planning policy in relation to bushfire planning in December 2017 as part of Amendment VC140 were a clear response to climate change and the potential for more extreme bushfire conditions. The changes to the policy require the prioritisation of the protection of human life and the direction of development to low risk locations where a bushfire attack level of BAL12.5 can be achieved under AS3959. The radiant heat exposure calculations under AS3959 on which the bushfire attack levels are based are calculated using a Fire Danger Index of 100 in Victoria. A FDI of 100 is reflective of the extreme conditions experienced on Black Saturday in 2009 or similar. Therefore low risk as defined under state planning policy is based on low risk in extreme conditions, and not just the conditions which might be experienced in a normal summer.

8(f) VC140 and Planning Practice Note 64

Amendment VC140 significantly strengthened State Planning Policy in relation to bushfire planning. It prioritised the protection of human life and in particular raised the bar in relation to settlement planning with the introduction of the following provisions to 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).
- 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.

State planning policy including the changes introduced as part of Amendment VC140 have been considered as part of Amendment C87gpla. I reaffirm the conclusion in my Expert Evidence Report that in my opinion, Amendment C87gpla is consistent with state planning policy in relation to bushfire planning as expressed in Clause 13.02-1S of the Golden Plains Planning Scheme subject to appropriate bushfire mitigation measures. These measures ensure that potential growth areas are low risk locations as set out above.

Planning Practice Note 64 was prepared prior to the Amendment VC140 changes to state planning policy on bushfire planning. Addressing state planning policy should take precedence over Planning Practice Note 64. The Strategic Bushfire Risk Assessment undertaken by the Golden Plains Shire Council and my Expert Evidence Report generally follow the approach set out in Appendix A – Considering the bushfire risk in local planning activities and Appendix B – Mitigating bushfire risk outside the Bushfire Management Overlay. In particular, the approach of utilising perimeter road to achieve an adequate separation distance between bush/grass fire hazard and residential development has been utilised.



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