

GUIDELINE

Applying the Bushfire Hazard Landscape Assessment in a Bushfire Management Overlay



1. Purpose

The purpose of this Guideline is to provide advice to practitioners on how the broader landscape should be considered and the Bushfire Hazard Landscape Assessment as required by Clause 52.47 of planning schemes should be applied to development in the Bushfire Management Overlay (BMO).

2. Application

This Guideline has relevance to all applications within the BMO. However, is most relevant to Pathway 2 (buildings and works); and Pathway 3 (subdivision) applications where the Bushfire Hazard Landscape Assessment has determined the proposal is within a type Three or Four landscape.

3. Background

As explained in Planning Practice Note 65 *Preparing and Assessing a Planning Application Under the Bushfire Provisions in Planning Schemes* (PN65), considering bushfire from the perspective of the broader landscape is important as it affects the level of bushfire risk development and its future occupants will be exposed to.

The defensible space and construction requirements in the BMO and Clause 52.47 are established based on the standard requirements of AS 3959-2009 *Construction of buildings in bushfire prone areas* (AS 3959-2009). To determine these requirements AS 3959-2009 models radiant heat from a potential fire front based on specified inputs and assumptions. This is often referred to as the 'design fire'. The accuracy of the design fire in reflecting the level of exposure to bushfire at a site varies. It is dependent on the potential size or scale to which a bushfire can grow before impacting.

The broader landscape and the potential scale and size of a bushfire are important considerations in the assessment of a planning application. Planning policy dictates that certain applications, namely those that are submitted under Pathways 2 and 3 must consider the wider bushfire landscape. However, all applications should have some regard to the broader landscape when considering the objectives of the State Planning Policy Framework (SPPF).

To consider the suitability and adequacy of the standard design fire of AS 3959-2009, 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). The site based assessment however, remains an important aspect to applying the requirement of the BMO and Clause 52.47. Hence, there is generally a need to undertake both a landscape and a site based assessment.

(Note: While Clause 52.47 does not require Pathway 1 applications to undertake a Bushfire Hazard Landscape Assessment, it is advisable that practitioners consider the landscape bushfire risk in all instances, as zoning may not reflect the true risk)

According to PN65, 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.

The State Planning Policy Framework (SPPF) at Clause 13.05 requires a 'precautionary' or cautious approach to decision making in the BMO. The likely size and scale of a bushfire should directly inform how 'cautiously' the bushfire provisions should be applied.

4. Considerations

PN65 identifies four landscape typologies (page 21). These seek to support more consistent decision-making based on the bushfire risk beyond the 150m site assessment area.

Where the landscape has been defined as either type One or Two, as set out on Page 36 of PN65, it is considered that the:

- Approved Measures under Clause 52.47-2 for 'buildings and works' should mitigate the bushfire risk from the broader landscape to an acceptable level for a development application.
- Approved Measures under Clause 52.47-4 for subdivision will most likely reduce the bushfire risk to an acceptable level.

Where 'buildings and works' are proposed in landscape types Three or Four, it may be necessary to further enhance safety through additional bushfire mitigation measures. Alternative Measures that seek to reduce the standard requirements of Clause 52.47 are unlikely to be suitable. Subdivision creating new lots should be carefully considered and may not be appropriate in these areas.

PN 65 provides images and points to consider when assessing the landscape risk. Many of these images however, do not show scale or provide advice on the type of vegetation or significance of the topography on fire behaviour. These will also be important considerations when undertaking or considering the Bushfire Hazard Landscape Assessment.

Classifying Vegetation & Slope

Once a bushfire is large, the weather and the interaction of the fire with itself becomes the dominant driver of fire behaviour. Variation in fuel and topography become less relevant as large bushfires tend to 'smooth' these out. This should be remembered when classifying vegetation and determining slope in landscape types Three or Four and the assessment of these factors should be made with due caution. This will include:

- Choosing the more conservative fuel type in situations where the classifiable vegetation does not fit neatly into a specific vegetation class. For example, in situations where the fuel load is closer to woodland but the structure is closer to a forest the more conservative 'forest' classification should be used. For 'modified' vegetation to be considered a valid classification, the level of modification and the distance the fire has to travel through these modified fuels must be significant. In most instances it will not be appropriate to classify fuels as modified in landscape types Three or Four. Similarly, fuels must be significantly managed and clearly meet defensible space prescriptions before they can be classified as 'low threat'.
- Considering the influence of slope on fire behaviour beyond the 150m assessment area as well as within.
- Determining effective slope on worst case rather than an average.

Defendable Space & Construction (BAL)

In a lower risk landscape, the need to maintain defendable space is closely aligned to the buildings construction level (BAL) and managing the risk to the asset. As the landscape risk intensifies the need for defendable space as a 'safety zone' around the building to better protect life increases. If the building fails during the passage of the fire front, the amount of defendable space becomes the critical factor for survival. The greater the distance between the building and residual burning, the quicker radiant heat levels in the area around the house become survivable.

The rate at which a structure loses tenability is strongly influenced by the bushfire attack mechanisms (ember attack, radiant heat or direct flame contact) most seriously impacting the building. For example, a building ignited by ember attack will likely start as a small smouldering fire which will then take time to develop into a fire large enough to threaten the structure. However, a building lost to high levels of radiant heat or direct flame contact will most likely lose tenability very quickly and before the environment outside is survivable. For developments provided with BAL 40 or BAL FZ defendable space and with no opportunity during a fire to move into a sufficiently cleared and maintained area, occupant survival relies totally on the building surviving for a period well beyond the passage of the fire front.

In landscape types Three or Four, it is important that defensible space provides an adequate safety zone. To appropriately meet the State's bushfire planning objectives in the higher risk landscapes defensible space should be provided based on worst case, to all aspects of the building and any or all of the following may also be necessary:

- Increase the level of defensible space beyond that required by Clause 52.47.
- Enhance the level of construction through bushfire sensitive design.
- Enhance the building's resistance to strong winds.
- Build to a higher BAL.
- Determine flame length and avoid direct flame contact.
- Enhanced vegetation management prescriptions. For example, a greater level of management for surface, elevated or canopy fuels.
- Be cautious in accepting reasonable assurance for offsite defensible space.
- Method 2 of AS 3959 should not be used to reduce the defensible space or construction requirements of Clause 52.47.
- Carefully consider the appropriateness of BAL 40 defensible space and avoid flame zone in type Three landscapes. In type Four landscapes, both BAL 40 and BAL FZ defensible space should be avoided.

Siting and Building Design

Building design and siting can play a significant role in the likelihood of a building surviving a bushfire event. Clause 52.47 provides basic requirements with regard to siting development. These include:

- Maximising the separation distance between the building and the hazard
- Building in close proximity to a road
- Providing access to the building for emergency service vehicles

However, in higher risk landscapes careful use and consideration of landform to enhance building protection when choosing a site will also be important. Landform can either be naturally occurring such as hills, ridges and gullies or constructed such as earth mounds, cut-and-fill terracing, and excavation into the ground. These features and techniques should be used to limit the exposure of the building to bushfire and fire induced winds.

Clause 52.47 requires that construction be to a BAL in accordance with AS 3959-2009. As with siting, this basic requirement can be enhanced. In the higher risk landscapes, the following should be considered:

- The building should be on a concrete slab or under floor spaces fully enclosed
- For BAL 12.5 and 19 decks, eaves and fascia should be constructed to comply with BAL 29
- Fire induced winds should be considered. This means constructing to lower cyclone levels,
- External materials attached to the building should be non-combustible. This includes decks and other structures
- Building should be of simple design with minimal re-entrant corners and basic roof lines
- A compliant private bushfire shelter might also be considered

Access

On days such as Black Saturday and Ash Wednesday when a bushfire grows large it no longer moves through the landscape as a definable fire front. The 'fire front' can be better described as an 'area of fire', likely to be impacting over many square kilometres rather than a fire with any definite edge. The larger the bushfire, the larger this area or impact zone.

With regard to access and egress from a property the potential scale of the fire and the size of its impact zone will be important to consider. Access roads through landscape types Three and Four are more likely to be blocked by spot fires. This could occur well before the main fire impacts the property and travelling even short distances can be problematic. In these landscapes, the access requirements of Clause 52.47 are important for egress well before any fires start and the ability for emergency services to attend as soon as possible after the fire has passed. The design response on the Site itself will need to respond to the fact it will not be safe to leave the property once fire is in the area.

Application Requirements

For applications in landscape types Three and Four it would be expected that the Bushfire Management Statement clearly articulates and explain the landscape fire behaviour and provides mitigation measures that reduce the bushfire risk to an acceptable level. The level of detail required for these types of applications is best prepared by a suitably qualified and experienced bushfire safety consultant. CFA recommends using a Fire Protection Association Australia (FPAA) accredited bushfire practitioner to support the preparation of these applications. A list of these consultants can be found on the FPAA website on the Bushfire Prone Area Design (BPAD) practitioner's page (<http://www.fpa.com.au/bpad.aspx>).

Further Information

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