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SPC

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COUNTRY FIRE SERVICE



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Department of Planning, Transport and Infrastructure
Planning and Development Division
Via email - DPTI.PlanningEngagement@sa.gov.au
Cc – Sarah Elding – sarah.elding@sa.gov.au

21 September 2018

Dear Sir/Madam

**South Australian Country Fire Service (SA CFS) response to consultation document –
“State Planning Policies (SPP’s)”**

I write in response to the recent public consultation of the above-mentioned document, as advertised on the SA Planning Portal. The SA CFS provides commentary in response to this document below. The SA CFS looks forward to continuing its relationship with DPTI, and relevant staff are able to meet with DPTI staff to discuss elements of this response further.

Principles of Good Planning

The SA CFS supports the various principles listed in this section of the document; however, there is no reference in this section of the document to natural hazards. Planning built environments with natural hazards in mind, and developing mitigation strategies around such hazards, are both key principles of good planning. In addition, the SA CFS believes that there should also be specific linkages and reference to bushfire risk and hazard mitigation included within these principles.

As an example, the SA CFS believes that the following ‘Principles of Good Planning’, as detailed on page 15 of the consultation document, be reworded (as per below underlining) to incorporate consideration of the bushfire risk within a particular area.

“Public realm should be designed to be used, accessible and appropriately landscaped and vegetated, whilst ensuring appropriate landscaping responses to the relative level of bushfire risk within the area”



“Cities and towns should be planned, designed and developed to be sustainable, and respond to any natural hazards (e.g. bushfire risk, flood risk) that may impact on these areas”

Additional wording under ‘Integrated Delivery Principles’ - “The management and mitigation of natural hazards (e.g. bushfire, flood) should be integrated across the planning system and consideration of such should occur in all relevant development policies”

State Planning Policy 1 – Integrated Planning

The SA CFS believes that consideration of natural hazards, and more particularly, bushfire risk, needs to be considered within this SPP. Whilst it is commended that climate change is detailed within this SPP, the risk of bushfires needs to be flagged within planning policy at this high level, particularly in relation to ‘natural areas’, ‘rural areas’ and ‘outer suburbs’ (as detailed on page 21 of the consultation document). In addition, the SA CFS looks forward to working with DPTI on the development of Regional Plans across SA, as well as the state wide Planning and Design Code.

State Planning Policy 4 – Biodiversity

The SA CFS sees a key linkage between nature-based tourism, the preservation of natural areas and rehabilitation works and bushfire planning and management. An example of policy integration within this SPP could be along the lines of the following (additional content underlined) –

“Encourage nature-based tourism and recreation that is compatible with, and at an appropriate scale for conserving the natural values of that landscape, whilst also ensuring that such uses are suitably designed and located to minimise risks from natural hazards (e.g. bushfire, floods).”

State Planning Policy 5 – Climate Change

The SA CFS has a strong interest in this SPP, given the impacts of climate change are real and are now being felt across the state. Climate change will lead to more extreme and intense weather events across the year, which creates a greater likelihood of natural disasters occurring. Therefore managing the risks presented by these natural hazards is paramount. In particular, the SA CFS acknowledges and strongly supports policy 4 within this SPP. Critical to this is the need for more updated and responsive mapping, which will be reviewed by DPTI, DEW and the SA CFS shortly.

State Planning Policy 15 – Natural Hazards

This policy is of paramount importance to the SA CFS, and DPTI is to be commended on the level of analysis provided in the introduction to this SPP. The SA CFS supports this analysis and overview, however it should also be noted that the cost burdens are not only upon property owners who build in high bushfire prone areas, but also on the SA CFS in terms of requiring improved response capability following increased development in such areas. Therefore, through reducing the amount of development in high bushfire prone areas, pressure on the SA CFS’s response capabilities will not be as onerous.

Similar to the above, the SA CFS largely supports the proposed policies in this SPP. In terms of Policy 3, relating to critical infrastructure, the SA CFS are supportive of this notion that such developments are not exposed to risk from natural hazards. The SA CFS seeks to work with DPTI on developing policy surrounding appropriate siting of such facilities, whilst also using

the SA CFS' Bushfire Management Area Plans (BMAP) to spatially identify suitable locations for such developments.

Further, in relation to this SPP, the SA CFS believe the following processes are critical next steps to ensure that the planning and development policy sitting under the SPP's is rigorous and appropriate for local contexts –

- A complete review of all existing bushfire mapping to occur before Natural Hazard/Bushfire Overlays are added into the SA Planning and Design Code
- In addition to the above, an analysis of the SA CFS's BMAP maps and data occur as a joint exercise between the SA CFS, DEW and DPTI, to determine how this can assist with new mapping layers in the SA Planning and Design Code
- A review of the various policies and methodologies that are used in this field interstate occurs as a joint exercise between the SA CFS and DPTI. It is noted that states with best practice models include NSW, Victoria and WA
- Ensure consistency between the Planning and Design Code and upcoming changes to the NCC/BCA & AS 3959, which will occur on 1 May 2019
- Ensure that the intent and content of documents set to be abolished (e.g. Minister's Specifications, Minister's Code etc) are carried forward into the new planning system
- Further discussion occur between the SA CFS and DPTI in relation to proposed Assessment Pathways and referrals, as well as the investigation of using Accredited Professionals in the bushfire risk assessment/management process. It is noted however that these will all form part of separate submissions to DPTI from the SA CFS in coming weeks

Please do not hesitate to contact me on (08) [REDACTED] or via email at [REDACTED] to discuss this matter further.

Yours Sincerely



Joel Taggart
Manager – Development Assessment Service