

BUSHFIRE PLANNING REPORT – 255 GRUBB ROAD, WALLINGTON

REF: 2026-145

7th July 2026

South Coast Bushfire Consultants

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- Native Vegetation Planning Permit Applications – Planet (Department of Planning and Community Development) Training Seminar (2013)

Version Control

	Name	Date Completed	Comments
Report Version		26/06/26	Version 1
		26/06/26	Version 2
		07/07/26	Version 3
Field Assessment		23/06/26	Version 1
Report Review		26/06/26	Version 1
Mapping		25/06/26	Version 1
		26/06/26	Version 2

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Requirements detailed in this document do not guarantee survival of the buildings or the occupants. The client is strongly encouraged to develop and practice a bushfire survival plan.

Information and assistance including a template for a Bushfire Survival Plan is provided as part of the 'Fire Ready Kit' available through the CFA website at <http://www.cfa.vic.gov.au> or through your local CFA Regional office.

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DEFINITIONS, ABBREVIATIONS AND ACRONYMS

AS 3959-2018	Australian Standard AS 3959 -2018 Construction of buildings in bushfire-prone areas
CFA	Country Fire Authority
Clause	A clause relates to a specific piece within the planning scheme
Clause 44.06	Bushfire Management Overlay
Clause 53.02	Planning for Bushfire
Clause 13.02-1S	Environmental Risk – Bushfire
DEECA	Department of Energy, Environment and Climate Action
BAL	Bushfire Attack Level
BPA	Bushfire Prone Area
BMO	Bushfire Management Overlay
BPR	Bushfire Planning Report
FRV	Fire Rescue Victoria
Method 1	refers to methodology in AS 3959-2018 for determining a BAL with a number of predetermined inputs
Method 2	refers to methodology in AS 3959-2018 for determining a site specific BAL
Pathway 1	refers to an application pathway in Clause 53.02 of the planning scheme
Pathway 2	refers to an application pathway in Clause 53.02 of the planning scheme
Planning Practice Note	a guide for using various sections of the planning scheme prepared by DELWP
RA	Responsible Authority
SCBC	South Coast Bushfire Consultants
Total Fire Ban Day	is declared by CFA on days when fires are likely to spread rapidly and could be difficult to control
VC248	Victorian Planning Scheme Amendment gazette 6 th May 2026

Bushfire Planning Report – 255 Grubb Road, Wallington

1. INTRODUCTION

This Bushfire Planning Assessment has been prepared to accompany a planning permit application for five tourist accommodation cabins at 255 Grubb Road, Wallington.

The site is located within a designated Bushfire Prone Area (BPA) under the Greater Geelong Planning Scheme. As the proposal requires a planning permit, the responsible authority must consider the bushfire decision guidelines contained within Clause 53.02-6 (Bushfire Planning) together with the relevant strategies of Clause 13.02-1S (Bushfire Planning).

The purpose of this assessment is to identify the bushfire hazards affecting the site, assess the associated level of risk, determine the applicable Bushfire Attack Level (BAL), and demonstrate that the proposed development incorporates appropriate bushfire protection measures. Particular consideration has been given to the accommodation use of the development, the potential presence of visitors unfamiliar with the local area, and the capacity of the site to provide an appropriate level of protection for occupants.

This assessment has been prepared in accordance with Clause 53.02 and Clause 13.02-1S of the Greater Geelong Planning Scheme, the *Planning Permit Applications in a Bushfire Management Overlay or Bushfire Prone Area – Guidelines* (DTP, 2026), the *Bushfire Hazard Assessments – Guidelines* (DTP, 2026), and Australian Standard AS 3959-2018 *Construction of Buildings in Bushfire-Prone Areas*.

2. EXECUTIVE SUMMARY

This report assesses the bushfire hazard affecting the proposed development of five tourist accommodation cabins at 255 Grubb Road, Wallington.

A Bushfire Hazard Assessment has been undertaken in accordance with the *Bushfire Hazard Assessments – Guidelines* (DTP, 2026), including an assessment of the landscape, neighbourhood and site-based bushfire hazards. The assessment identified that the predominant bushfire hazard is associated with managed grassland to the north and east of the site. While the Ocean Grove Nature Reserve contributes to the broader bushfire landscape, its separation from the proposed development and the existing pattern of surrounding development means it does not determine the Bushfire Attack Level for the proposed accommodation.

The broader landscape has been assessed as Landscape Type 1 – Low Landscape Risk. This reflects the fragmented nature of the surrounding vegetation, extensive areas of managed grassland and vineyards, established residential development, benign topography, and the limited potential for long, uninterrupted fire runs. Although a grassfire may occur under extreme bushfire weather conditions, the broader landscape does not exhibit the characteristics of a higher-risk bushfire environment.

A Bushfire Attack Level assessment undertaken in accordance with AS 3959-2018 demonstrates that the proposed accommodation cabins can achieve a maximum Bushfire Attack Level of BAL-12.5. Construction to BAL-12.5, together with ongoing management of defendable space in accordance with Clause 53.02-5, will provide an appropriate level of protection from ember attack, radiant heat and direct flame contact.

The proposed development is located within an established tourism precinct with direct access to Grubb Road and the surrounding public road network. The site is connected to a reticulated water supply and provides suitable access for emergency service vehicles. Having regard to the site's Landscape Type 1 – Low Landscape Risk classification and the ability to achieve BAL-12.5 construction, a dedicated static water supply for bushfire firefighting is not considered necessary.

Overall, the assessment demonstrates that the proposed development can appropriately manage the identified bushfire hazard through suitable siting, BAL-12.5 construction, ongoing vegetation management and appropriate access arrangements. The proposal is therefore capable of satisfying the relevant bushfire planning objectives and decision guidelines of Clause 53.02 and Clause 13.02-1S of the Greater Geelong Planning Scheme.

3. METHODOLOGY

This assessment has been prepared in accordance with the Greater Geelong Planning Scheme, as amended by VC248 (gazetted 5 May 2026), including Clause 53.02 (Bushfire Planning) and Clause 13.02-1S (Bushfire Planning). The assessment has also been undertaken in accordance with the *Planning Permit Applications in a Bushfire Management Overlay or Bushfire Prone Area – Guidelines* (DTP, 2026), the *Bushfire Hazard Assessments – Guidelines* (DTP, 2026), and AS 3959-2018 *Construction of Buildings in Bushfire-Prone Areas*.

The assessment comprises a Bushfire Hazard Landscape Assessment of the broader landscape (20–75 kilometres), a neighbourhood assessment, and a site assessment (within 150 metres of the proposed development). These assessments consider vegetation, topography, bushfire history, prevailing bushfire weather patterns, access and egress opportunities, and the potential bushfire hazards affecting the proposed development.

A Bushfire Attack Level (BAL) assessment has been undertaken in accordance with Method 1 of AS 3959-2018 to determine the appropriate construction standard for the proposed accommodation cabins. The assessment also considers the bushfire protection measures required to manage the identified hazards, including siting, vegetation management, construction standards, access for emergency services and the ongoing management of defensible space.

Finally, the proposal has been assessed against the decision guidelines of Clause 53.02-6 and the relevant strategies of Clause 13.02-1S to demonstrate that the identified bushfire hazards can be appropriately managed and that the protection of human life has been prioritised in the design of the development.

4. SITE PARTICULARS

4.1 Site Details

Address:	255 Grubb Road, Wallington 3222
Lot & Plan Number:	Current: Lot 1 PS444051 (Future: Lot 1 PS930855)
Municipality:	Greater Geelong
Existing Development:	Oakdene Vineyards, Restaurant and Cellar Door
Directory Reference:	Melway 484 C3

4.2 Planning Zones and Overlays

Clause Number	Name
	GREATER GEELONG PLANNING SCHEME
Planning Policy	
13.02-1S	<i>Bushfire Planning</i> <i>To strengthen the resilience of settlements and communities to bushfire through risk-based planning that prioritises the protection of human life.</i>
Planning Zone:	<i>To implement the Municipal Planning Strategy and the Planning Policy Framework.</i>
32.07	<i>Farming Zone (FZ)</i>
Planning Overlay:	<i>To implement the Municipal Planning Strategy and the Planning Policy Framework.</i>
	<i>Protected Settlement Boundary (PSB)</i>
42.02	<i>Vegetation Protection Overlay (VPO)</i> <i>Schedule 1</i>
Planning Provisions	
53.02	<i>Bushfire Planning</i> <i>To ensure that the development of land prioritises the protection of human life and strengthens community resilience to bushfire.</i> <i>To ensure that the location, design and construction of development appropriately responds to the bushfire hazard.</i> <i>To ensure development is only permitted where the risk to life, property and community infrastructure from bushfire can be reduced to an acceptable level.</i>

	<i>To specify location, design and construction measures for a single dwelling that reduces the bushfire risk to life and property to an acceptable level.</i>
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5. BUSHFIRE HAZARD LANDSCAPE ASSESSMENT

The Bushfire Hazard Landscape Assessment has been undertaken in accordance with the Bushfire Hazard Assessments – Guidelines (DTP, 2026) and considers the broader landscape factors that influence bushfire behaviour and the potential risk to the site. The assessment is supported by Map 1, which illustrates the bushfire hazards and key landscape features surrounding the site.

The assessment examines the characteristics of the surrounding landscape that may contribute to bushfire development, intensity and spread. Key considerations include the extent and connectivity of vegetation, the potential for long fire runs, topography and terrain influences, prevailing bushfire weather patterns, access to lower risk areas, and the availability of road networks for emergency access and evacuation. These factors collectively inform the assessment of the broader bushfire hazard affecting the site and assist in determining the appropriate landscape classification in accordance with the DTP guidelines.

5.1 Vegetation extent in the broader landscape

The subject land is located on the Bellarine Peninsula approximately 3 kilometres north of Ocean Grove and 18 kilometres south-east of Geelong. The surrounding landscape is characterised by a mixture of vineyards, agricultural land, residential development and established townships including Wallington, Ocean Grove and Leopold.

The broader landscape is predominantly cleared for agriculture, resulting in fragmented vegetation and limited opportunities for continuous fire runs. The principal bushfire hazard within the surrounding landscape is grassland. Areas of woodland and forest vegetation are generally confined to isolated reserves and drainage corridors (Barwon River to the southwest), the most significant being the Ocean Grove Nature Reserve located approximately 1km south of the subject site.

Unlike heavily forested landscapes, the Bellarine Peninsula contains numerous interruptions to fuel continuity, including roads, urban development and cultivated farmland. These features limit the potential for large, high-intensity bushfires to establish across the broader landscape.

Bushfire behaviour within the region is primarily influenced by hot, dry north to north-westerly winds preceding the passage of a cold front, followed by strong south-westerly wind changes. Under these conditions, grassfires may spread rapidly across agricultural land. The subsequent south-westerly wind change may result in rapid changes in fire direction and remains an important consideration in assessing the bushfire hazard affecting the site.

Overall, the surrounding landscape presents a low to moderate bushfire hazard, with the greatest risk associated with unmanaged grassland fuels and the isolated areas of woody vegetation within the Ocean Grove Nature Reserve.

5.2 Surrounding Road Network

The surrounding road network is excellent as Grubb Road is a major road running between the township of Ocean Grove and the Bellarine Highway.

5.3 Bushfire History of the Area

The bushfire history of the locality has been reviewed using the Bushfire History (since 1970) mapping available through NatureKit (DELWP, 2019). The mapping indicates that the reserve to the south (approximately 900m to the south) has experienced two more significant bushfire events, occurring in 1990 and 1997. A smaller fire ignition was also recorded in 2015; however, the

limited extent of the mapped fire scar indicates that the fire was contained quickly with minimal spread.

The recorded fire history demonstrates that bushfires have occurred within the surrounding reserve, although there is no evidence of frequent or extensive fire activity affecting the site in recent decades. The absence of repeated large bushfires suggests that the local landscape has not experienced a history of recurring high-intensity fire events.

In the context of the proposed development, the bushfire history is consistent with the broader assessment of the locality, which identifies the site as being within a low landscape bushfire risk area. The proposed accommodation units are capable of achieving a Bushfire Attack Level (BAL) of BAL-12.5, which is considered appropriate for the level of bushfire hazard affecting the site.

5.4 Landscape Type

In accordance with the *Bushfire Hazard Assessments – Guidelines* (DTP, 2026), the broader landscape surrounding the site has been assessed to determine the potential bushfire hazard affecting the proposed development. The assessment considers the extent and connectivity of vegetation, the potential for long fire runs, topographic influences, historical bushfire activity, prevailing bushfire weather patterns, and the availability of access and egress opportunities.

The site is located within a predominantly developed rural-residential landscape characterised by vineyards, agricultural land, established residential development and a fragmented pattern of vegetation. The surrounding topography is generally flat, providing limited opportunity for slope-driven fire behaviour or the development of high-intensity bushfires. The fragmented nature of the landscape interrupts fire spread and reduces the potential for long, continuous fire runs.

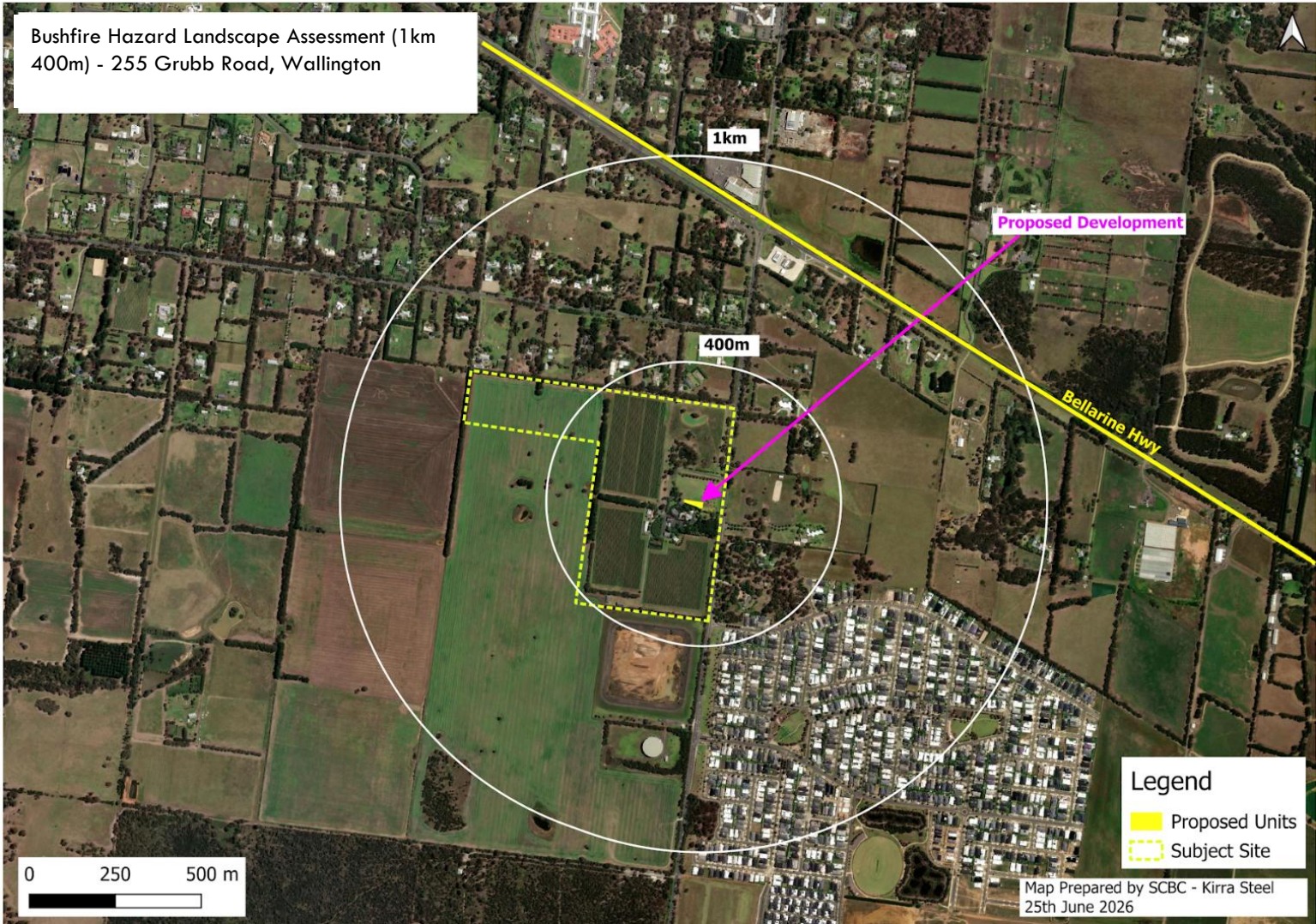
Under extreme bushfire weather conditions, a grassfire may develop within the surrounding agricultural land; however, the intensity and rate of spread are moderated by the extensive areas of managed vegetation, vineyards, roads and residential development that create effective fuel breaks throughout the landscape. Access and egress from the site is provided by a well-connected public road network, allowing occupants multiple evacuation options to lower-risk urban areas.

Having regard to the characteristics of the surrounding landscape, the site is considered to be located within a Landscape Type 1 – Low Landscape Risk Area. The proposed accommodation units are capable of achieving a Bushfire Attack Level (BAL) of BAL-12.5, which is commensurate with the identified bushfire hazard and provides an appropriate level of protection for the development.

5.5 Map 1 - Bushfire Hazard Landscape Assessment



5.6 Map 2 – Bushfire Hazard Assessment at 1km and 400m radius.



6. BUSHFIRE HAZARD SITE ASSESSMENT

The Bushfire Hazard Site Assessment includes a plan that describes the bushfire hazard within 150 metres of the proposed development. The description of the hazard is prepared in accordance with AS 3959-2018 Construction of buildings in bushfire prone areas (Standards Australia) excluding paragraph (a) of section 2.2.3.2 (Vegetation Exclusions).

6.1 Map 3 – Bushfire Hazard Site Assessment



6.2 Vegetation

The vegetation within the 150 metre assessment area was classified according to AS 3959-2018 and the ‘Overall fuel hazard assessment guide’ (DSE 2010).

The AS 3959-2018 approach uses a generalised description of vegetation based on the AUSLIG (Australian Natural Resources Atlas: No.7 Native Vegetation) classification system. According to this method, vegetation can be classified into seven categories. Each category indicates a particular type of fire behavior and these categories or classifications are then used to determine bushfire intensity.

Table 1 – Vegetation Assessment

Vegetation Classification	Vegetation Type (AS 3959-2018 Description)	Site Description
Grassland	<u>Open Woodland/Low Open Woodland/Open Shrubland/Low Open Shrubland/Hummock Grassland/Closed Tussock Grassland/Tussock Grassland/Open Tussock/Sparse Open Tussock/Dense Sown Pasture/Sown Pasture/Open Herbfield/Spare Open Herbfield:</u> All forms (except tussock, moorlands), including situations with shrubs and trees, if the overstorey foliage cover is less than 10%. Includes pasture and cropland.	The surrounding landscape is characterized by agricultural land uses, including vineyards, grazing land and areas of scattered vegetation. Where the land supports grassland that is not managed to less than 100mm the grassland is classified as a hazard in accordance with AS 3959-2018. Figure 1– Grassland to the east on neighboring site 

Figure 2 – Grassland to the north of the proposed development

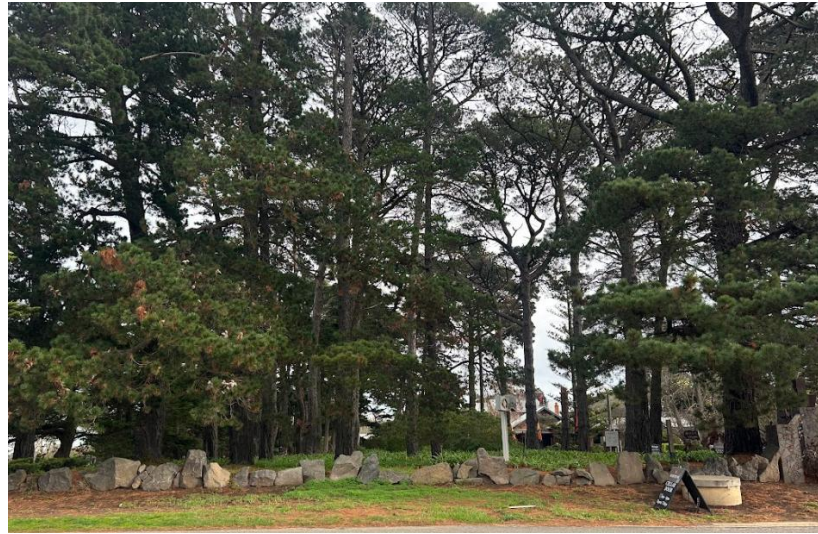


Figure 3 – Grassland to the Northeast of proposed development



Low Threat	<i>The following vegetation shall be excluded from a BAL assessment:</i> (a) <i>Vegetation of any type that is more than 100m from the site.</i> (b) <i>Single areas of vegetation less than 1 ha in area and not within 100m of other areas of vegetation being classified.</i> (c) <i>Multiple areas of vegetation less than 0.25ha in area and not within 20m of the site, or each other of other areas of vegetation being classified vegetation.</i> (d) <i>Strips of vegetation less than 20m in width (measured perpendicular to the evaluation exposed to the strip of vegetation) regardless of length and not within 20m of the site or each other, or other areas of vegetation being classified.</i> (e) <i>Non-vegetated areas, including waterways, roads, footpaths, buildings and rocky outcrops.</i> (f) <i>Vegetation regarded as low threat due to factors such flammability, moisture content or fuel load. This includes grassland managed in a minimal fuel condition, mangroves and other saline wetlands, maintained lawns, golf courses (such as playing areas and fairways), maintained public reserves and parklands, sporting fields, vineyards, orchards, market gardens (and other non-curing crops), cultivated gardens, commercial nurseries, nature strips and windbreaks.</i>	The vegetation within the vineyard and within the managed gardens surrounding the existing buildings is considered low threat due to its managed condition. Where there are small areas of trees they are limited in area and have a highly managed understorey. Figure 4 – Low Threat vineyards along Grubb road to the south 
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Figure 5 – Low Threat vegetation South of the proposed development within existing cellar door site



6.3 Topography

Topography of the land surrounding a site is particularly important as the topography influences the rate of spread and intensity of a fire. Fire burns faster uphill, as the slope increases so does the speed of the fire and its intensity. As a general rule for every increase 10° up a slope, the fire will double its speed and conversely down a slope. Fires tend to move more slowly as the slope decreases.

The land surrounding the site is characteristic of undulating agricultural landscape. Within approximately 3 kilometres of the site, the landscape is predominantly grassland with gentle rolling hills and no significant slopes. The topography surrounding the site does not provide conditions that would significantly increase fire intensity, flame height or the rate of fire spread towards the proposed development.

Map 3 - Topography of the surrounding area



6.4 Bushfire Attack Level (BAL) for the proposed development

The bushfire attack level (BAL) is a means of measuring the severity of a building's potential exposure to ember attack, radiant heat and direct flame contact, using increments of radiant heat expressed in kilowatts per meter squared. The BAL is also the basis for establishing the requirements for construction to improve protection of building elements from attack by bushfire.

The highest BAL determines the construction requirements for each building within the site.

The BAL for this site has been calculated using a 'Forest Fire Danger Index' (FFDI) of 100 and a Flame Temperature of 1090K. These parameters are in accordance with the risk parameters set in AS 3959-2018.

The proposed development includes 5 accommodation units that are in a cluster the BAL assessment has been undertaken on the cluster of accommodation units not on each individual unit for the purpose of determining the BAL.

Table 2 – BAL Determination – Accommodation Units

Orientation	Highest threat vegetation	Slope under classifiable vegetation	Distance to vegetation	Bushfire Attack Level (BAL)
North	Grassland	Downslope 0-5°	22m	BAL 12.5
East	Grassland	Downslope 0-5°	22m	BAL 12.5
South	Low Threat	-	-	BAL 12.5
West	Low Threat	-	-	BAL 12.5

7. BUSHFIRE MANAGEMENT PLAN AND STANDARD PERMIT CONDITIONS

Bushfire Management Plan – 7th July 2026 – Version 3 (Prepared by South Coast Bushfire Consultants)	
Bushfire Management Plan 255 Grubb Road, Wallington	
Construction Standards All buildings are required to be constructed in accordance with a BAL of 12.5 from AS 3959-2018. Vegetation within 22m of the units, to all aspects must be managed as defendable space. Vegetation Management requirement of defendable space includes: • Grass must be short cropped and maintained during the declared fire danger period. • All leaves and vegetation debris must be removed at regular intervals during the declared fire danger period. • Within 10 metres of a building, flammable objects must not be located close to the vulnerable parts of the building. • Plants greater than 10 centimetres in height must not be placed within 3 metres of a window or glass feature of the building. • Shrubs must not be located under the canopy of trees. • Individual and clumps of shrubs must not exceed 5 square metres in area and must be separated by at least 5 metres. • Trees must not overhang or touch any elements of the building. • The canopy of trees must be separated by at least 5 metres. • There must be a clearance of at least 2 metres between the lowest tree branches and ground level.	Water Supply The site is connected to a reticulated water supply and is not within the BMO. A static water supply is not required for the proposed development. Access As the site is for accommodation purposes it is recommended that the access has the following requirements: • All-weather construction. • A load limit of at least 15 tonnes. • Curves must have a minimum inner radius of 10m. • The average grade must be no more than 1 in 7 (14.4 per cent) (8.1 degrees) with a maximum of no more than 1 in 5 (20 per cent) (11.3 degrees) for no more than 50m. • Have a minimum trafficable width of 3.5m of all- weather construction. • Be clear of encroachments for at least 0.5m on each side and 4m above the accessway. • Dips must have no more than a 1 in 8 (12.5 per cent) (7.1 degrees) entry and exit angle.

8. RESPONSE TO CLAUSE 53.02-6 – DECISION GUIDELINES

Clause 53.02-6 – Decision Guidelines <i>Before deciding on an application, in addition to the decision guidelines in Clause 65, the responsible authority must consider:</i>	
Consideration	Response
<i>The Municipal Planning Strategy and the Planning Policy Framework (PPF).</i>	The proposal has been assessed against Clause 13.02-1S (Bushfire Planning), Clause 53.02-6 (Bushfire Planning) and the relevant provisions of the Greater Geelong Planning Scheme. The assessment prioritises the protection of human life through appropriate siting, the provision of defensible space and construction to BAL-12.5, consistent with the low bushfire hazard affecting the site.
<i>The impact of any State, regional or local bushfire management and prevention actions occurring around the site and in the wider area on the bushfire hazard and the level of risk to the proposed development.</i>	The surrounding landscape is characterised by vineyards, managed agricultural land and established residential development. Bushfire management activities within the wider area may assist in reducing fuel loads; however, the assessment does not rely on these activities. The development has been designed to respond to the bushfire hazard present on and surrounding the site.
<i>The risk of bushfire to people, property and community infrastructure.</i>	The site is located within a Bushfire Prone Area where the primary bushfire hazard is associated with grassfire and ember attack under extreme fire weather conditions. The proposed accommodation units achieve a maximum Bushfire Attack Level of BAL-12.5 and incorporate appropriate separation from hazardous vegetation, reducing the bushfire risk to an acceptable level. The BAL has been undertaken on a conservative basis and significant areas of the grassland to the north withing the property are likely to managed to a low threat condition when the accommodation units are complete.

<i>Whether the risk arising from the broader landscape can be mitigated to an acceptable level.</i>	The broader landscape has been assessed as Landscape Type 1 – Low Landscape Risk in accordance with the <i>Bushfire Hazard Assessments – Guidelines</i> (DTP, 2026). This classification reflects the absence of extensive, continuous bushfire fuels capable of supporting prolonged high-intensity fire behaviour. The site is predominantly surrounded by managed grassland, vineyards and established rural-residential development, with no large areas of unmanaged forest or other continuous hazardous vegetation in the immediate landscape. The surrounding topography is generally flat, limiting the influence of slope on fire behaviour, while the fragmented pattern of vegetation, roads and existing development interrupts potential fire spread and reduces the opportunity for long fire runs. Although a grassfire may occur under extreme bushfire weather conditions, the broader landscape does not exhibit the characteristics of a higher-risk bushfire environment. Accordingly, the identified bushfire risk can be appropriately managed through the proposed siting of the accommodation units and construction to a maximum Bushfire Attack Level of BAL-12.5.
<i>Whether bushfire protection measures to address the identified bushfire risk are required and can be practically implemented, including any measure set out in clause 53.02-4.</i>	Bushfire protection measures are required and can be practically implemented for the proposed development. The accommodation units are capable of achieving a maximum Bushfire Attack Level of BAL 12.5 through appropriate siting and construction in accordance with AS 3959-2018. The surrounding managed vegetation can be maintained to provide the required separation from hazardous vegetation on an ongoing basis, consistent with the vegetation management objectives of Clause 53.02-4. The proposal has regard to the bushfire protection measures contained in Clause 53.02-4, including the siting of buildings, ongoing vegetation management, appropriate construction standards, and the provision of safe access for emergency services. The site fronts a sealed public road, benefits from a connected road network and is serviced by a reticulated water supply. Having regard to the site's classification as Landscape Type 1 – Low Landscape Risk, the low level of bushfire hazard, and the availability of reticulated firefighting water, a dedicated static water supply for firefighting purposes is not considered necessary. Collectively, these measures demonstrate that the bushfire risk can be managed to an acceptable level while providing for the ongoing operation of the accommodation use.

Whether bushfire protection measures can be implemented without unacceptable biodiversity impacts.	Bushfire protection measures can be implemented without unacceptable biodiversity impacts. The required vegetation management is limited to routine maintenance of the existing landscaped and managed areas surrounding the development and does not require the removal of significant native vegetation.
Proposed Vegetation	
If vegetation is proposed, whether it will cause or contribute to the bushfire hazard or increase the risk to life, property, or community infrastructure.	Any proposed landscaping should be designed and maintained to minimise bushfire hazard and should comprise species with low flammability characteristics selected using the Country Fire Authority's Plant Selection Key and the principles contained within <i>Landscaping for Bushfire: Garden Design and Plant Selection</i>. The proposed landscaping will not increase the bushfire hazard affecting the development or compromise the required defendable space. Vegetation surrounding the accommodation units can be managed on an ongoing basis in accordance with the defendable space objectives of Clause 53.02-5, ensuring that fuel loads remain low and the separation from hazardous vegetation is maintained for the life of the development.
Dwellings and small second dwellings.	
Whether a static water supply for bushfire firefighting is required having regard to the size of the lot, proximity to a hydrant and connection to reticulated water. If a vehicle accessway is greater than 30 metres in length or the relevant fire authority requires access to the static water supply on the land, whether the access	The proposed development is located within an existing serviced property that is connected to a reticulated water supply and fronts a sealed public road. Having regard to the Landscape Type 1 – Low Landscape Risk classification, the ability to achieve a maximum Bushfire Attack Level of BAL-12.5, the proximity of the development to the public road network, and the availability of reticulated firefighting water, a dedicated static water supply for bushfire firefighting purposes is not considered necessary. The proposed accommodation units are accessed via the existing internal road network, which provides suitable access for emergency service vehicles. As a dedicated static water supply is not

<i>design and construction requirements set out in Table 3 to clause 53.02-5 should be met.</i>	recommended for the development, the access design and construction requirements for firefighting water supplies contained in Table 3 to Clause 53.02-5 are not applicable. The site can, however, provide appropriate access for emergency service vehicles to access to the site and as it is an established tourism site there are large areas of carparking to enable a vehicle to turn around.
Vulnerable People	
<i>For a building used for accommodation (other than a dwelling or small second dwelling), education centre, hospital, leisure and recreation or place of assembly the responsible authority must also consider:</i> <i>The capacity for vulnerable occupants to evacuate.</i> <i>Whether the water supply and access arrangements have regard to the characteristics of the vulnerable occupants.</i> <i>Whether there is reasonable assurance that the emergency management arrangements will be ongoing and protect human life.</i> <i>Whether the risk to vulnerable occupants warrants the closure of the use or development on days of elevated fire danger.</i> <i>Whether measures to shelter in place are warranted and whether the measures will protect human life.</i> <i>The net benefit provided to any existing vulnerable people.</i>	The proposed accommodation may be occupied by visitors unfamiliar with the local area. Existing site management procedures should include monitoring of fire danger ratings and emergency warnings, providing bushfire information to guests, and implementing early relocation where required. The site benefits from multiple access points to the surrounding public road network, supporting evacuation if necessary. Given the low landscape bushfire risk and the BAL-12.5 outcome, the proposed development provides an appropriate level of protection for occupants.

Subdivision	
<i>Whether each lot can achieve the setback from the bushfire hazard in accordance with the vegetation type and slope set out in Table 1 to clause 53.02-5 for the corresponding distance specified in Column C of that Table.</i> <i>Whether a staged subdivision manages interim bushfire hazard during the construction or staging.</i>	Not applicable.

9. RESPONSE TO CLAUSE 13.02-1S AND 13.02-1L – BUSHFIRE PLANNING

1.3 Strategies: Protection of Human Life

Give priority to the protection of human life by:

Strategy	Consideration
Prioritising the protection of human life over all other policy considerations.	The proposal prioritises the protection of human life through the assessment of bushfire hazards and the implementation of appropriate bushfire protection measures. The proposed accommodation units can achieve a maximum Bushfire Attack Level (BAL) of BAL-12.5, are appropriately sited within an established tourism precinct and are surrounded by managed vegetation that can be maintained in accordance with Clause 53.02-5.
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.	The proposed development is located within an established tourism facility in a Landscape Type 1 – Low Landscape Risk area, as determined through the Bushfire Hazard Landscape Assessment undertaken in accordance with the <i>Bushfire Hazard Assessments – Guidelines</i> (DTP, 2026). The landscape assessment considers the characteristics of the broader environment within approximately 20–75 kilometres of the site, including the extent and continuity of hazardous vegetation, the potential for long fire runs, topography, bushfire history, prevailing bushfire weather patterns, and the availability of access and egress. The assessment determined that the site is situated within a predominantly modified landscape comprising managed grassland, vineyards, rural-residential development and local road infrastructure. The surrounding vegetation is fragmented and interspersed with cultivated land and existing development, limiting the continuity of fuels and reducing the potential for large, high-intensity bushfires to develop. The generally flat topography further limits fire behaviour by reducing the influence of slope on fire spread and intensity. Although a grassfire may occur under extreme bushfire weather conditions, the

	broader landscape does not exhibit the characteristics of a higher-risk bushfire environment dominated by extensive, continuous forest or woodland vegetation. The site also benefits from direct access to a sealed public road and a connected road network, providing reliable access to areas of lower bushfire risk. Collectively, these characteristics support the classification of the site as Landscape Type 1 – Low Landscape Risk, where bushfire risk can be appropriately managed through suitable siting, ongoing vegetation management and construction to a maximum Bushfire Attack Level of BAL-12.5.
Reducing the vulnerability of communities to bushfire through the consideration of bushfire risk in decision making at all stages of the planning process.	Bushfire risk has been considered through the planning permit process for the proposed development. The construction of the accommodation will be to a BAL of 12.5 as permitted through the building permit stage.
1.4 Strategies: Bushfire Hazard Identification and Assessment <i>Identify bushfire hazard and undertake appropriate risk assessment by:</i>	
Strategy	Consideration
Applying the best available science to identify vegetation, topographic and climatic conditions that create a bushfire hazard.	The assessment has been undertaken in accordance with the <i>Bushfire Hazard Assessments – Guidelines</i> (DTP, 2026), <i>Planning Permit Applications in a Bushfire Management Overlay or Bushfire Prone Area – Guidelines</i> (DTP, 2026) and AS 3959-2018. Vegetation, topography, bushfire history, weather patterns and likely fire behaviour have been considered.
Considering the best available information about bushfire hazard including the bushfire prone area map.	The site is located within a designated Bushfire Prone Area and the assessment has considered both the Bushfire Prone Area mapping and the site-specific bushfire hazards.

Applying the Bushfire Management Overlay to land where the extent of vegetation can create an extreme bushfire hazard.

Considering and assessing the bushfire hazard on the basis of:

Landscape conditions — within 20–75km of the site.

Local and neighbourhood conditions — within approximately 5km.

Site conditions — within 150 metres.

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 planning permit applications 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.

The site is not affected by the Bushfire Management Overlay. The broader landscape does not exhibit the characteristics of an extreme bushfire hazard and has been assessed as Landscape Type 1 – Low Landscape Risk.

The assessment includes a landscape-scale, neighbourhood-scale and site-specific bushfire hazard assessment. The broader landscape is characterised by fragmented vegetation, managed agricultural land and existing development, limiting the potential for long fire runs.

The assessment has been prepared having regard to current CFA and Department of Transport and Planning guidance and incorporates bushfire protection measures appropriate to the identified level of risk.

Consultation with emergency management agencies will be undertaken through the planning permit process if deemed necessary by the Referral Authority.

Bushfire risk has been assessed and appropriate bushfire protection measures have been incorporated, including BAL-12.5 construction, ongoing vegetation management and suitable access for emergency services.

The assessment demonstrates that the required bushfire protection measures can be readily implemented and maintained for the life of the development.

1.5 Strategies: Settlement Planning

Plan to strengthen the resilience of settlements and communities through settlement growth, land use and development that prioritises the protection of human life by:

Strategy	Consideration
Assessing the bushfire hazard at different spatial scales (landscape, local and neighbourhood and site), the likely fire behaviour, bushfire risk and the potential for local and neighbourhood-scale destruction.	Bushfire hazards have been assessed at the landscape, neighbourhood and site scales. The assessment concludes that the site is located within a Landscape Type 1 – Low Landscape Risk area where the predominant hazard is associated with grassfire under extreme weather conditions.
Directing population growth and development to low-risk locations, being those where: The risk from large bushfires in the wider landscape can be managed. Development will not be exposed to radiant heat exceeding 12.5 kW/m². There is reliable access to areas of better protection. Bushfire protection measures can be provided to manage ongoing risk.	The proposal is located within an established tourism precinct where the broader landscape risk can be effectively managed. The accommodation units achieve BAL-12.5 construction, have direct access to the surrounding road network and are not exposed to radiant heat levels exceeding 12.5 kW/m ² .
Ensuring alternative low-risk locations for settlement growth have been assessed.	The proposal involves the expansion of an existing tourism facility and does not represent a strategic settlement planning decision. The assessment demonstrates that the existing site is capable of accommodating the proposed development with appropriate bushfire protection measures.

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. Not approving a plan that will result in the introduction or intensification of development in an area with radiant heat exposure exceeding 12.5 kW/m².	The proposal incorporates appropriate siting, construction and vegetation management measures and will not increase bushfire risk to surrounding development or community infrastructure. The proposed development achieves no net increase in bushfire risk through appropriate siting, BAL-12.5 construction, ongoing vegetation management in accordance with Clause 53.02-5 and access via the existing road network. The proposed accommodation units can achieve a maximum Bushfire Attack Level of BAL-12.5 through appropriate setbacks and ongoing vegetation management.
1.6 Strategies: Areas of Biodiversity Conservation Value	
Strategy	Consideration
When assessing a planning permit application for a use or development that will result in people congregating in large numbers: Consider the risk of bushfire to people, property and community infrastructure. Require appropriate bushfire protection measures. Ensure development can implement bushfire protection measures without unacceptable biodiversity impacts.	The proposed accommodation has been assessed having regard to the bushfire hazard affecting the site. Appropriate bushfire protection measures, including BAL-12.5 construction, defensible space and ongoing vegetation management, can be implemented without unacceptable impacts on biodiversity values.

1.7 Policy Guidelines and Policy Documents	
Strategy	Consideration
Any applicable approved state, regional and municipal fire prevention plan.	The assessment has considered relevant municipal bushfire planning information together with local bushfire history, prevailing weather patterns and the characteristics of the surrounding landscape.
AS 3959-2018 Construction of buildings in bushfire-prone areas.	A Bushfire Attack Level assessment has been undertaken in accordance with AS 3959-2018. The proposed accommodation units are capable of achieving BAL-12.5 construction.
Design guidelines for settlement planning at the bushfire interface (DELWP, 2020).	The proposal is not associated with settlement planning.
The bushfire prone area map.	The site is located within a designated Bushfire Prone Area and has been assessed in accordance with the applicable bushfire planning provisions.

10. REFERENCES

Legislative and Planning Framework

Department of Transport and Planning (DTP) (2026). *Whittlesea Planning Scheme*. Victorian Government, Melbourne, Victoria.

Department of Transport and Planning (DTP) (2026). *Victorian Planning Provisions (VPP)*, including:

- Clause 13.02-1S – Bushfire Planning;
- Clause 53.02 – Bushfire Planning; and

Department of Transport and Planning (DTP) (2026). *Planning Schemes Online*. Victorian Government. Available at: <https://www.planning.vic.gov.au>

Bushfire Planning Guidance

Country Fire Authority (CFA) (2012). *FSG LUP 0002: Requirements for Water Supply and Access in the Bushfire Management Overlay (BMO)*. Country Fire Authority, Burwood East, Victoria.

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Department of Environment, Land, Water and Planning (DELWP) (2020). *Design Guidelines for Settlement Planning at the Bushfire Interface*. State Government of Victoria, Melbourne, Victoria.

Department of Environment, Land, Water and Planning (DELWP) (2020). *Planning Practice Note 64 – Local Planning for Bushfire Protection*. State Government of Victoria, Melbourne, Victoria.

Australian Standards and Building Requirements

Australian Building Codes Board (2019). *National Construction Code (NCC)*. Australian Building Codes Board, Canberra, Australian Capital Territory.

Standards Australia (2018). *AS 3959-2018 Construction of Buildings in Bushfire-Prone Areas*. Standards Australia, Sydney, New South Wales.

Mapping and Spatial Data Sources

Department of Energy, Environment and Climate Action (DEECA) (2026). *NatureKit Mapping Portal*. Victorian Government. Available at: <https://maps.deeca.vic.gov.au/naturekit/>

Country Fire Authority (CFA) (2026). *Bushfire Prone Area Mapping*. Victorian Government.

Department of Transport and Planning (DTP) (2026). *VicPlan and Planning Maps Online*. Victorian Government.

11. APPENDICES

11.1 Appendix 1 – Definition of low threat vegetation

There are two different definitions of 'Low Threat' vegetation. One is detailed within the planning scheme (Clause 53.02 Bushfire Planning) and another in AS 3959-2018.

Within the body of this report the vegetation within a 150m radius of the site is assessed in accordance with AS 3959-2018. The vegetation within the site is recommended to be managed largely in accordance with defensible space from Clause 53.02 for defensible space when the development is complete.

Low threat vegetation – AS 3959-2018

The definition in AS 3959-2018 includes the following:

- *Multiple areas of vegetation less than 0.25ha in area and not within 20m of the site, or each other of other areas of vegetation being classified vegetation.*
- *Strips of vegetation less than 20m in width (measured perpendicular to the evaluation exposed to the strip of vegetation) regardless of length and not within 20m of the site or each other, or other areas of vegetation being classified.*
- *Non-vegetated areas, including waterways, roads, footpaths, buildings and rocky outcrops.*

Vegetation regarded as low threat due to factors such flammability, moisture content or fuel load. This includes grassland managed in a minimal fuel condition, mangroves and other saline wetlands, maintained lawns, golf courses (such as playing areas and fairways), maintained public reserves and parklands, sporting fields, vineyards, orchards, market gardens (and other non-curing crops), cultivated gardens, commercial nurseries, nature strips and windbreaks.

Low threat vegetation (Defendable Space) – Clause 53.02

The definition of 'Low Threat' vegetation is detailed in Clause 53.02 for sites within the Bushfire Management Overlay (BMO). Clause 53.02 refers to areas of low fuel loads around buildings as areas of Defendable Space. The vegetation management criteria of defensible space include the following:

- Grass must be short cropped and maintained during the declared fire danger period.
- All leaves and vegetation debris must be removed at regular intervals during the declared fire danger period.
- Within 10 metres of a building, flammable objects must not be located close to the vulnerable parts of the building.
- Plants greater than 10 centimetres in height must not be placed within 3 metres of a window or glass feature of the building.
- Shrubs must not be located under the canopy of trees.
- Individual and clumps of shrubs must not exceed 5 square metres in area and must be separated by at least 5 metres.
- Trees must not overhang or touch any elements of the building.
- The canopy of trees must be separated by at least 5 metres.
- There must be a clearance of at least 2 metres between the lowest tree branches and ground level.