

Narelle Campbell

Thank you for the opportunity to provide feedback on these draft reports. Thank you to Mr Lapsley for your expert and considered research and advice – these draft plans recognise the importance of human life and risk mitigation in Nillumbik. This focus is a first for council and it is welcome.

My feedback is based on a page turn. In summary:

1. The “mitigate risk and reduce fuel loads” language is very welcome and would benefit from repetition
2. Acknowledgement of Melbourne Water and Vic Roads as key stakeholders responsible for management, risk mitigation and fuel load reduction on public land would benefit from strengthening
3. Recognition of significant public and private assets and infrastructure across the rural Nillumbik area, and the importance of protecting them from harm and reducing the risk to them would benefit from acknowledgement and strengthening
4. Risk mitigation requires an increase in fuel reduction across the landscape to protect people, assets, and high value biodiversity (including flora and fauna) – the plan should be clearer on this
5. Addressing the conflict between planning and emergency management policy and regulation (whereby more than 70 per cent of rural residents risk homelessness and economic disadvantage if they leave their homes because land zoning does not match settlement patterns) would provide a safer environment for rural residents to plan and this should be addressed in the plan
6. Acknowledging the relationship between rural residents and council staff has historically been characterised by distrust is necessary as it is a barrier to improving community resilience

Specific notes are following. Thank you again for this opportunity.

Regards

Narelle Campbell

Specific Commentary

It is noted that these documents are not in draft – which should be the case if these documents are being forwarded for consultation.

Nillumbik Shire Council - Feedback Bushfire Mitigation Strategy 2019-2023 Comments

Page 4 of 18 paragraph 4 operating principles for bushfire mitigation - Council needs to articulate the protection of private and public assets as a bushfire mitigation principle – this is not currently

included and should be, particularly since most families with homes within the rural area covered by bushfire management overlay have no housing security in the event of property loss because the area's zoning is not fit for purpose. (page 4 of 18 paragraph 4 operating principles for bushfire mitigation)

Page 5 of 18 Paragraph 3 – caring communities (quote evidence or delete), wonderful rural setting (delete emotive language), adjacent to suburbia (factually incorrect – 17 per cent of Nillumbik Shire IS suburbia – the balance is green wedge – please correct this error as it is misleading), community committed to environmental sustainability (quote evidence or delete), people generally understand risk and threat of bushfire (quote evidence or delete – there is significant evidence people have extremely limited understanding of bushfire risk and threat – or that people do not value the environment and human life) , the place they love and live in (or live near to).

Page 5 of 18 Paragraph 4 – SOME of the Nillumbik communityrespects their values (what are these? Quote evidence or delete. Nillumbik Shire values are mixed and mostly unknown).

Page 5 of 18 Paragraph 5 – exercise care when describing how well-informed and responsible the community is. If you have it quote evidence, otherwise limit commentary to SOME

Page 6 of 18 Paragraph 3 – the majority of the shire is not KNOWN as Green Wedge zone – it is outside of the urban growth boundary – can this language be fixed please? It's clunky.

Page 6 Paragraph 8 – 14.4 per cent of survey respondents identify bushfire management and prevention is an issue (this supports comments re Page 5 Paragraph 3 – people are largely unaware bushfire management and prevention is an issue for everyone – in a population where 97 per cent of the land mass is designated Bushfire Prone – it is almost inconceivable that 85 per cent of the population does not consider bushfire prevention and management to be an issue for the shire. It is suggestive of a community in denial or ignorant – and neither of these things are helpful)

Page 9 of 18 - Treechange movement – this is not new – Nillumbik has been home to people wanting a lifestyle change for more than 40 years. The level of ignorance of new families does not depend on them lifestyle property seekers – it is a factor of them being unfamiliar with the environment and their responsibilities to themselves and neighbours. Please change the Tree changer to LIFESTYLE – as much of Nillumbik is pasture, farm, as well as bush.

Page 10 of 18 – Information gathering – online communication relies on on line access – and the green wedge still has mobile and internet black spots. This section should state this.

Page 10 of 18 – Rural/urban interface – Nillumbik is not at the interface of metropolitan Melbourne – it IS IN the interface – 17 per cent of the shire IS metropolitan Melbourne and 97 per cent is rural. Language matters and these urban myths of “we are not metro” need to be corrected.

Page 12 of 18 – Priorities need to include protection of homes, assets and infrastructure and the statement that fuel load reduction is a priority needs to be made because it is true

Page 13 of 18 – Operating principle 2 – Balancing environmental protection with bushfire risk – firstly re-word “balancing bushfire risk *mitigation* with environmental protection” – and secondly all

environmental protection is not the priority of Australian or Victorian government policy – high value biodiversity assets is and this should be specifically stated

Page 13 of 18 – Operating principle 4. Modifying fuel and fuel configuration – should be specifically stated that this means reducing fuel

Page 14 of 18 - Objectives/Goals 1.3 replace the word *maintain* with the words *strengthen and improve* annual roadside and hazardous tree removal

Page 14 of 18 – Objectives/Goals 1.6 incorporate consideration of measuring into the goal so that this can be demonstrated

Page 14 of 18 – Objectives/Goals new goal to reduce the impact of bushfire incidents – planning scheme in Nillumbik to be amended so that zones reflect settlement patterns to remove the housing insecurity created by the current conflict between planning and emergency management policy, regulation and legislation

Page 15 of 18 – Objectives/Goals 2.2 reducing vegetation is not the goal, reducing *fuel* is – so perhaps this might be more explicitly stated

Page 15 of 18 – Objectives/Goals 2.5 explicitly include reduction of fuel in this objective

Page 16 of 18 – Objectives/Goals introduce reporting against fuel reduction (new 3.8)

Emergency Management Future Directions Plan (2019)

Page 9, 1.3 Objectives for bushfire management on public land – the area includes a gas pipeline, water pipeline, high voltage overhead power lines, a water storage catchment and a water treatment plant. This should be stated because asset protection, including community and private infrastructure, needs to be a priority of public land managers and this is not mentioned at all in this plan.

Pages 7-11 – I was looking for commentary around conflicting government policy in this section and it is not present – and should be. At the moment, bushfire policy is “Go early” – which is nice. The area’s property zoning profile is such that more than 70 per cent of rural properties are smaller in size than the zone imposed on them. The effect that this has on residents is that more than 70 per cent of rural landholdings do not have housing security. If homes and infrastructure is lost to bushfire more than 70 per cent of homes need a Victorian act of parliament to re-build. This practice is mirrored across Victoria and means that most property owners across rural Victoria experience housing insecurity that metropolitan residents do not. This plan must recognise the problem of conflicting policy and regulation. It must articulate the rural disadvantage risk that this problem of conflicting policy and regulation causes. It must discuss that conflicting policy occurs in Nillumbik, the most densely populated bushfire prone place in the world. It must discuss the effect – which is that rural resident bushfire policy is to leave – and yet if they do leave and lose their home to fire – they may experience homelessness and economic disadvantage. The effect of this policy and regulatory conflict on the behaviour of rural residents is not clear – and this plan should say so. Reporting routinely says “most people do not have a plan” – which ignores the obvious – which is that most people are currently placed in a position of making a terrible choice every bushfire season

– to risk life or face financial devastation– and this caused by government policy, regulation and legislation. If the zoning across the area was reflective of the actual settlement patterns locally, the residents could make more informed planned decisions safe in the knowledge that if they leave (which is the current policy), and lose their homes and infrastructure, they will be able to re-build.

Page 13 2.1 Emergency management policies etc – because escalation capability is not guaranteed this presents a risk – perhaps expressing it as a risk might assist the reader to contextualise the di

Page 16 2.5 This plan should articulate and recognise there is longstanding acknowledged distrust of council and council employees in the rural community. This is a significant barrier to any council plan or action on any issue achieving success. Recognition of the issue and a plan to address the issue is important. Likewise any communication and engagement programming needs to consider there are still mobile and internet black spots across the area and this is a barrier and challenge to be overcome.

Page 17 – the resident champion concept role is innovative and may overcome existing barriers

Page 20 – community resilience, diversity and inclusion – important that this section considers what can be done to mitigate risk in the first instance.

Page 21 – A resilient Nillumbik – never heard of it – no idea what it means.

Page 22 3.5 include language around prevention and mitigation in this section. Community resilience is not around recovery – it is around prevention

Page 23 Recommendation 1 – Include mitigation and prevention. Also include addressing the conflict between zoning and emergency management policy by re-zoning the rural area to reflect settlement patterns and improve the ability of the community to plan for safety

Page 23 Recommendation 2 – consider Vic Roads and Melbourne Water stakeholders in the Mitigation strategy as the largest stewards of public land in Nillumbik. No need to have environment represented – environmental policy does not manage land or reduce fuel – public land stewards do

Page 24 – Best practice model to include the words mitigate risk and reduce fuel

Page 26 – Appendix A Refer commentary about conflicting policy pages 7-11 above

Attachment B

Vegetation Management –

- roadside include the text “reduce fuel and mitigate risk”
- private land include the text “reduce fuel and mitigate risk”
- Council reserves etc include the text “reduce fuel and mitigate risk”

Community Engagement -

- Engagement with lobby groups – noted
- Provide housing security to rural residents by changing rural zoning to ensure it reflects settlement patterns across the area to improve rural resident ability to activate current

emergency management policy. This provides security to more than 70 per cent rural residents and overcomes the current fear of homelessness and economic disadvantage

- Acknowledge distrust in council and council staff in the rural Communities see 16 2.5 above

Nillumbik Bushfire Mitigation Strategy 2019. Comments by Warwick Leeson OAM.

The draft document, although repetitive in many instances, is an extremely positive approach to a significant issue facing the Shire of Nillumbik, its residents, businesses and visitors.

Craig Lapsley PSM deserves special congratulations for the professional and independent manner in which he has undertaken his role in consulting widely with Nillumbik council, residents and interested parties.

My strong view is that the Bushfire Mitigation Strategy needs to be considered as an interactive part of Climate Change and Council's Green Wedge Management Plan.

I would cite the Mayor, Cr Karen Egan's recent references to this year's state-wide survey that found Nillumbik residents considered themselves to be the happiest municipality in Victoria, and posit that that happiness is based on the environment in which those surveyed live and the existing character and amenity of their local townships.

The importance of this Bushfire Mitigation Strategy will be determined by how the council and landowners of Nillumbik respond to its final iteration; if it seen as just another document, the effort of its preparation will be wasted.

It needs to be almost bed-time reading for those of us who care about Nillumbik, its future and its challenges; it needs to contain not just evidence-based information but, also, explanatory implementation tools.

It needs to inform us, it needs to explain how we can improve our understanding and attitudes, and it needs to encourage us and explain how we can all become involved.

Comments:

Under Definitions (page 3, para 1), it is recognised that not all bushfires can be prevented, but the consequences of such events can be minimised.

I will begin my commentary with addressing the issue of mitigation of impact; both in terms of awareness/education and aftermath. I would draw attention to two seminal Reports that came out of the 2009 bushfires: 'Advice for Government' and 'Advice we offer to Communities impacted by disaster'.

Both Reports were formulated as part of the 'Lessons learned by Community Recovery Committees of the 2009 Victorian Bushfires; these Reports were welcomed by the state government of the day and were extremely useful guides, both within Australia and overseas.

Locally, both the Strathewen and St Andrews Community Recovery Committees, contributed significantly to these Reports and it is worth noting that those two Community Recovery Committees were the only ones in Victoria that were community led, as distinct from statutory body-led and both were, in hindsight, peer-reviewed to be exemplar models for any future recovery and rebuilding committees. Rather than seeking to re-invent the wheel, I suggest this Bushfire Mitigation Strategy draws on proven models and I would highlight the 'Be Ready Warrandyte' Project as a starting point.

Designed out of the lessons from the 2009 Victorian Bushfires, the 'Be Ready Warrandyte; Living with Bushfire Risk' template was adjudged by the 2013 Victorian Fire Awards Panel to be the best communication tool, the best educative tool and the overall winner of all Victorian contributions.

The template has been widely used both within Australia and overseas and is credited with assisting emergency bodies in handling both the prelude and aftermath of bushfires; it has the added advantage in that it can readily be adapted to deal with any type of emergency.

Under **Executive Summary (page 4, para 2)**, reference is made to the ‘unique challenges within Nillumbik’, citing ‘proximity to river frontage with high fuel loads’.

This Strategy needs to be mindful of the Yarra River Protection (Wilip-gin Birrarung murrong) Act 2017.

In 2017, landmark legislation passed through the Victorian Parliament to protect the Yarra River for future generations.

In an Australian first, the Yarra River Protection (Wilip-gin Birrarung murrong) Act 2017 enables the identification of the Yarra River and the many hundreds of parcels of public land it flows through as one living, integrated natural entity for protection and improvement.

Additionally, to underline the importance of the public parklands and open spaces along the Yarra River within metropolitan Melbourne, the Act allows these to be collectively declared as the Greater Yarra Urban Parklands.

Under **Introduction (page 5, para 4)**, reference is made to Nillumbik’s vegetation and terrain, that allows fire to move with speed.

Landowners, especially those new to the shire, need to be made aware of this aspect and to appreciate that grass and open area fires travel at a considerably greater speed than heavily vegetated areas.

Page 6, ‘Nillumbik Shire – profiles and partnerships’ (para 2)

contains a premise with which I am uncomfortable. Just because people are older/retired, does not mean that that they are necessarily more vulnerable; in fact, the opposite may well be true. Older/retired people do not (usually) have to plan their days around work commitments, educational demands, etc. and can (frequently) exercise greater flexibility in reacting to any threat of bushfire.

Referring again to the Be Ready Warrandyte experiences, there was significant localised neighbourhood support for elderly/retired residents through the ‘telebuddies program’.

I would suggest that the stringent state and local government planning laws ought to be ranked as a higher attribution factor for the 1% population growth in Nillumbik.

Page 6, para 4, notes the challenges of reducing fire risks through collaboration.

It may be that consideration could be given to provision of a subsidised fuel reduction cleaning/clearing program, similar to Melbourne Water's streamside management grants and council's own blackberry spraying scheme.

In its own way, such a program could be viewed as an extension of green waste collection scheme.

One factor, acknowledged (**page 7, paras 1-4**) in this document, that is, to my mind, worthy of strong consideration is that of 'cool burns', as was practiced by the first Australians from time immemorial.

I would suggest that local Landcare Groups, some of whom already engage in cool burn training programs, could be utilised and subsidised to educate local residents in this skill.

Such a collaborative approach with Landcare Groups would have the twin benefits of not only using a proven fuel reduction methodology but also educating local landowners on environmental issues and opportunities.

It is worth noting that current 'controlled burns' are clearly not meeting the targets set and this is, in no small part, due the limited window-of-opportunity available, both from weather and personnel aspects.

Equally, there are well-founded concerns that 'controlled burns' do significant environmental damage; if the fire intensity is too great, seeds in the soil can be killed and commercial beekeepers report that damage done to honey grounds from prescribed burns is having a profound impact on the honey industry and will devastate bee populations if nothing changes.

Council's role & policy context, (page 7, para 2), highlights the importance of **'shared responsibility'** and should, I believe, besides placing strong emphasis on shared obligation, highlight the 'personal responsibility' aspect; this was glossed over in the 2009 Victorian Bushfires Royal Commission Report, presumably on the grounds of sensitivity.

Shared responsibility is not just about what others can do for me, but equally about what I can/should/must do in discharging my obligations to my community, my environment and those who may be called upon in times of emergency.

Too often, there have been examples of individuals ignoring sage advice, placing themselves in positions of peril and expecting others to come to their aid.

'Challenges within the shire' (page 9):

The Community: Aging population:

I challenge the contained presumption that just because Nillumbik has a 35.8% population aged over 50, they are "less capable of maintaining their property and reacting to bushfire threat"; I have, earlier on, made my comments on this.

Perhaps the claim ought to be tested by establishing the demographics of Nillumbik's aged population; if they are concentrated in the major activity centres, rather than in the rural areas, I would posit that there would be less likelihood of un-maintained properties and poor reaction capacities.

The Community: Extent of privately-owned land:

Again, I stress that council support for local Landcare Groups is an ideal way to work with an agency that is informed, both about the environment and the risks and threats of living in a bushfire risk location.

Such Groups are not viewed as authoritarian and engender a more neighbourly, inclusive and welcoming feel to encourage participation.

The Community: Treechange movement:

Given Nillumbik's projected 1% growth rate, the number of people moving to 'larger properties' may not be all that great; if one accepts the implied premise, under Aging population (para 1), that the rural areas house many aged people then, presumably, the newcomers will be younger and reduce the number of 'at risk' residents.

New landowners, who can be readily identified through council's rating department, could/should receive appropriate information encouraging their active interaction with their local Landcare Group and Rural Fire Brigade.

Reminders about shared responsibility could also be forwarded to **all** landowners with their rates notices.

The Community: Changes to ... information gathering:

One of the great challenges faced by the Community Recovery Committees, in the aftermath of the 2009 Bushfires, was in accessing information from statutory bodies.

Constantly, we were fobbed off with "Privacy laws prevent us disclosing that information".

In times of emergency, the niceties of privacy considerations ought to be relegated in the interests of efficiency in responding to the immediacy of the crisis.

The Environment (page 10):

To avoid duplication, my comments will be found under page 13 Operating Principles.

The Economy:

Again, citing the Be Ready Warrandyte model, businesses in the Warrandyte shopping precincts decided that on **Code Red** days, they would be closed; on **Extreme** days, staff numbers would be reduced and, as best as possible, customers would be advised through signage.

Visitors & Tourism (page 11):

Parking issues in Laughing Waters Rd, Eltham and Bradleys Lane, North Warrandyte have already been identified as 'hot spots' in that both roadways are narrow and often vehicles, especially oversized ones such as fire trucks and other emergency vehicles, cannot get through when tourists' vehicles have been parked in either of the roadways.

I would suggest a far stricter approach; No Parking signage, issuing of an infringement notice to any transgressors and, in extreme cases (recidivism or dangerous parking) towing the offending vehicle away. Pussyfooting around with 'please don't do this again' methods may well see emergency vehicles unable to respond to a critical incident.

Mobile phone black spots (page 11):

Liaison with federal Members of Parliament is the quickest way to solve this issue.

Likewise, landowners need to appreciate that black spots can only be eradicated by having mobile phone towers, so the issue becomes a fairly clear choice between having a tower and having communication or not having a tower and not having reliable communication.

Refer this comment also to Ensuring Strong Advocacy; page 16, Goal 4.2.

Page 12, 'Strategic Priorities'; I applaud the reduction from 7 points to 4 – these four appear to cover all the requisite aspects.

However, they should, in my view, be listed in a non-hierarchical manner, lest point 1 be interpreted as more significant than point 4; in reality, each point is interdependent on, and equal to, the others.

Page 13, 'Operating Principles' invites the reference that, in **point 2 (Balancing environmental protection with bushfire risk)** attention needs to be given to the recent Deakin University's Centre for Integrative Ecology paper 'Is Melbourne's urban sprawl creating more bushfire risk?'

This paper observes that, according to the Australian Institute of Criminology, more bushfires are started by people, either accidentally or deliberately, than natural causes, such as lightning. The paper's author, Prof, Don Driscoll, opines "People need a dose of nature, so there is a trade-off to be made between access to nature and living in high-density housing in a concrete jungle".

Prof. Driscoll also notes, "There is compelling evidence that broad-scale fuel reduction burns in forests make no appreciable difference to the risk that houses will burn down".

Clearly, any environmental/bushfire risk assessments need to be evidence based; in other words – kill the myths.

Refer this comment also to Ensuring Strong Advocacy; page 16, Goal 4.3.

Under **Objectives: Strategic Priorities (page 14, Goal 1.1):**

Acknowledged above is that most bushfires are started by people, either accidentally or deliberately.

Council has an opportunity to prevail upon state government and its authorities (VicPol and CFA) to increase penalties to those who break the law in respect to lighting of fires during dangerous periods, such as during fire restrictions.

My suggestion would be that council strongly advocate:

- that there be no exemptions from prosecution for people lighting or causing fires during fire restriction periods, and

- that legislation be introduced, by the state government, that any act of arson causing, or liable to cause, a bushfire be deemed to be an act of terrorism; such a fire has the same indiscriminate and random capacity to kill, traumatise and destroy as any other act of terrorism.
(This commentary could also be considered under Ensuring Strong Advocacy; page 16, Goal 4.1)

Strategic Priorities (Goal 1.10):

The recent VicRoads' installation of continuous roadside barriers along both the Kangaroo Ground- St Andrews & Kangaroo Ground-Yarra Glen Rds, has significantly limited road access and egress, by emergency services vehicles, in that the provided passing and pull-over bays are not designed with bushfire and/or other emergency service vehicles requirements in mind.

Strategic Priorities (page 15, Goal 1.11)

While Neighbourhood Safer Places and Community Fire Refuges might have a place on more isolated areas (such as Wesburn, Warburton, etc) in areas such as Nillumbik, I would prefer to see greater emphasis on the Leave Early message.

Unless landowners fully understand the implications and commitments required by the Stay and Defend policy, it is far better, to my mind, to encourage people to be prepared to leave on the days of danger.

Having NSP & CFR can engender a belief that "I can wait until the last minute, then decide to leave"; we all know that, more often than not, ends in tears.

Creating Community Approach to Bushfires (page 15, Goal 2.3):

I would have thought that the outcomes from the recent Green Wedge Management Plan Panel would provide much of this information.

As has been noted, people who live in Nillumbik 'love where they live' and, generally, accept the risk of bushfire as one of the aspects of their choice of domicile.

Creating Community Approach...(Goal 2.8):

While there are many content tools, I would again promote the Be Ready Warrandyte Project example; it is readily available, it is readily adaptable to every township and its success is proven.

Summary:

As earlier stated, my view is that the Bushfire Mitigation Strategy needs to be considered as an interactive part of Climate Change and Council's Green Wedge Management Plan.

To support this view, I attach a document, signed by more than 23 former fire and emergency leaders, from multiple Australian states and territories, including Craig Lapsley PSM, former Emergency Management Commissioner and Fire Services Commissioner, former Deputy Chief Officer, CFA, Victoria.

These signatories, with centuries of fire and emergency services experiences between them, are unequivocal in linking climate change and increased risks from natural disasters, especially bushfires.

There exists clear scientific evidence that climate change impacts through extreme weather conditions and Nillumbik's Green Wedge Management Plan needs to address the issue of inappropriate tree clearing and land-use pressures as more likely than not to exacerbate climate change at a local level.

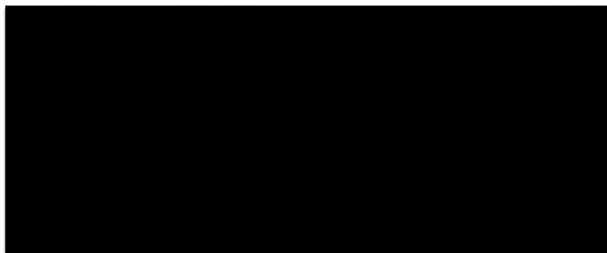
On the basis of 'think global, act local', we ought to, at least, be playing our part in protecting our Green Wedge and our shire's unique character and, in so doing, contributing towards addressing the issue of extreme weather conditions.

One of the attachments' 23 signatories, Greg Mullins AO, AFSM, the second longest-serving Fire & Rescue Commissioner in New South Wales, and now a councillor with the Climate Council, stated, "Australia's emergency resources were still equipped for what was happening in the 1970s to the 1990s. It's just frustrating to hear the lip service being given to 'Oh yes, we now believe in climate change and need to do something' when every effort to do something about it is rubbished".

Another signatory, Neil Bibby AFSM, noted, "We're doing the same old things when things are getting worse. We need to find new ways to tackle this problem".

Congratulations ought to be given to those responsible for the extensive consultation and information process in preparing this Bushfire Mitigation Strategy; with community goodwill and participation, the way forward will be mapped out.

Regards,



Warwick Leeson OAM.



Member: Birrarung Council

Secretary: St Andrews Community Bushfire Recovery Association

Deputy Chair: Be Ready Warrandyte Project

Former fire chiefs warn Australia unprepared for escalating climate threat.

Major parties must recognise 'national firefighting assets' are needed to fight worsening natural disasters, say fire experts



Two dozen former fire and emergency chiefs from all over Australia want the next prime minister to ensure emergency services have the resources to fight natural disasters caused by climate change.

More than 20 former fire and emergency chiefs from multiple states and territories say Australia is unprepared for worsening natural disasters from climate change and governments are putting lives at risk.

In a statement issued before a federal election date is announced, 23 former emergency services leaders and senior personnel have called on both major parties to recognise the need for "national firefighting assets", including large aircraft, to deal with the scale of the threat.

The signatories include: Greg Mullins, the second-longest serving fire and rescue commissioner in New South Wales and now a councillor with the Climate Council; Neil Bibby, a former chief executive of Victoria's Country Fire Authority; Phil Koperberg, a former NSW rural fire service commissioner and former Labor MP and NSW environment minister.

The document calls on the next prime minister to meet former emergency service leaders "who will outline, unconstrained by their former employers, how climate change risks are rapidly escalating".

The group also wants the next government to commit to an inquiry into whether Australia's emergency services are adequately resourced to deal with increased risks from natural disasters caused by climate change.

They said some large firefighting aircraft were prohibitively expensive for states and territories and leased from the northern hemisphere, and access to them was becoming more restricted as fire seasons started to overlap.

"I started firefighting in 1971 and the bushfire seasons were extremely predictable," Mullins said. "They'd start in Queensland and move south progressively.

"You knew when there was a bad season coming because there was an El Nino and drought. In the 90s, I stopped being able to predict it."

Australia's emergency resources were still equipped for "what was happening in the 1970s to the 1990s".

"The first thing is we need whoever is in government nationally to take climate change seriously, rather than making jokes about it in parliament with lumps of coal," he said.

"It's just frustrating to hear the lip service being given to 'Oh yes, we now believe in climate change and need to do something' when every effort to do something about it is rubbish."

Last year, in Australia alone, the NSW fire season began in early August, a heatwave led to fires in rainforest areas of Queensland in early December, and forest in Tasmania's world heritage area caught fire in January, Australia's hottest month on record.

"You look at any of your headlines over the last six months," Bibby said. "The hottest month. The hottest summer.

"We know the problem, and the only way to get politicians to do something about these things is put their jobs on the line."

Bibby said an additional concern was that Australia relied so heavily on volunteers during natural disasters.

As extreme weather becomes more frequent, and fire seasons longer, that would put strain on the system and volunteers helping their communities were at risk of burnout.

There needed to be a review of the methods used to tackle large fires, cyclones and floods that was backed by research from experienced people working on the ground.

"We're doing the same old things when things are getting worse. We need to find new ways to tackle this problem," Bibby said.

Signatories:

Mary Berry	Former CEO, Victorian State Emergency Service
Neil Bibby AFSM	Former CEO, CFA; former Deputy CO Melbourne MFB
Tony Blanks AFSM	Former Fire Unit Manager, Tasmania National Parks
Mike Brown AM, AFSM	Former Chief Fire Officer, Tasmania Fire Service
Naomi Brown	Former CEO, Australasian Fire & Emergency Services
Bob Conroy	Former Fire Manager, NSW National Parks & Wildlife
Maj Gen Peter Dunn AO	Former Commissioner, ACT Emergency Services
John Gledhill AFSM	Former Chief Fire Officer, Tasmania Fire Service
Jeff Godfredson AFSM	Former Chief Fire Officer Melbourne MFB
Wayne Gregson APM	Former Commissioner, WA Fire & Emergency Services

Craig Hynes AFSM	Former Chief Operations Officer, WA Fire Services
Lee Johnson AFSM	Former Commissioner, Qld Fire & Emergency Services
Murray Kear AFSM	Former Commissioner, NSW State Emergency Service
Phil Koperberg AO, BEM	Former Commissioner, NSW Rural Fire Service
Craig Lapsley PSM	Former Vic Emergency Management Commissioner
Andrew Lawson AFSM	Former Deputy Chief Officer, SA Country Fire Auth.
Grant Lupton AFSM	Former Chief Fire Officer, SA Metrop. Fire Service
Greg Mullins AO, AFSM	Former Commissioner, NSW Fire & Rescue
Frank Pagano AFSM, ESM	Former Exec. Director, Qld Emergency Management
Steve Rothwell AFSM	Former Chief Fire Officer, NT Fire & Emergency
Stephen Dutton	Former Chief Fire Control Officer, NT Bushfires
Ken Thompson AFSM	Former Deputy Commissioner, NSW Fire & Rescue
Ewan Waller AFSM	Former Chief Fire Officer, Vic Forest Fire M'ment.

Evidence / Factual based

The strategy includes many statements about the level of risk faced in Nillumbik and that Death and destruction is coming. Any statements should evidence based. The reality is Nillumbik on the whole experiences very few bush fires and with very little life and property loss (Black Saturday is obviously an exception). The strategy should include statements of fact and consider actual risk based on likelihood and consequence measured against a criteria. Most of Victoria is listed as Fire-Prone and the criteria seems to simply be "not suburbia".

The recent fire history (last 10 – 15 years) and impact of these should be included as the past can be an indicator of the future.

There is also no doubt that fire is a significant risk to Nillumbik. Many other communities are however at a much greater risk from public forest on two, three or four sides of their community.

My experience of the community is that in the majority they have little or no understanding of fire. They just think they do and community messaging is not reaching them. Many have a fire plan of stay and see and as soon as they see the fire go. People also dont understand the difference between total fire ban days and the fire danger index. They think every TFB is a catastrophic day and after a few where they dont die they get complacent.

Indigenous Burning

The concept is fine and may work very well in different parts of Australia. The use of fire for cultural purposes is also fair enough.

Is there actual evidence of timing and technique of Indigenous burning in Nillumbik fuel types? As can be seen from the recent inability to burn after the rain in April/May at the time it seems we should be doing these cool burns the land doesn't sustain any fire in surface fuels.

Very small fires of very low intensity done infrequently are not going to significantly reduce fire risk in Nillumbik. There are also a lot more property boundary's and assets around then when pre 1750.

Land owners raking and burning (or sending to greenwaste) is likely to be more appropriate in many situations. Candling is also likely to be very effective and reducing intensity with bark fuel making up a significant component of total fuels.

We also run the risk of residents not familiar with fire having it get away on that day or days after due to poor management.

Removal of vegetation

The removal of vegetation is not necessarily the answer it does however need management and some removal may be appropriate.

Causes of fire

An actual review of data on the causes of fires in Nillumbik should be undertaken. Most are from grass cutting or escaped burn offs I'm tipping not arson or reckless behavior.

Plan-Do-Check -Act

The mitigation strategy should be continually checking its performance through review against the objectives and targets. Where the review identifies an opportunity to improve it should be taken.

Don't Overreach

The Shire has limitations on what it can and cant do. Things such as developing volunteer leaders within agencies may be agency business not councils. Also Community bush fire plans have been developed for Nillumbik Communities.

Things we should be doing

- Look at a landscape level in terms of risk and where we can put in interventions to mitigate. Interventions should include candling of bark hazards and other treatments such as mulching, broad scale burning should also play a part as Indigenous burning is unlikely to be effective on a landscape level.
- Council should provide gis assistance to ensure that property size is well understood and recognizable to property owners and cfa to ensure bylaws are complied with.
- Council should consider its availability of council assets for prevention, preparedness and response activities eg Graders, water carts, personnel.
- Planning to burn in late march early April before the first significant rain. Our burns should be relatively small and crews able to head out on a training night to complete small parts of a larger burn in a mosaic pattern or as part of a larger picture. Every burn should be integrated with weed management and community engagement.
- Consider mitigation in terms of fire danger eg the mitigation measures required for a severe fire danger day are very different than those for a catastrophic day.

Eltham Community Action Group submission to the Draft Bushfire Mitigation Strategy 2019

It is good to have the opportunity to provide feedback on the Draft.

We acknowledge that some of our submission in reality, should be aimed at State Government policy. However the points that we raise may not have been considered at all within Council and also by Councillors, in particular the Planning Units within Council so we raise them here. We have already taken our concerns to the local Member and will forward this submission to the draft, to her to take to the Minister.

Having said that, we do recognise that *Council has statutory responsibilities under the Planning and Environment Act 1987 and the Planning and Environment Regulations 2005.*

This includes: Councils in consultation with the relevant fire authority, ensure the application of State land use planning and building policies taking into account bushfire safety.

Councils in consultation with the relevant fire authority are responsible for assessing property development projects for bushfire safety.

Biodiversity Challenges within the Nillumbik

The underlying issue to any bushfire mitigation proposals are – do the proposals/actions have a more deleterious effect on biodiversity than a cool bushfire? Obviously extreme/hot bushfires are a totally different proposition.

Human activity has had an impact on biodiversity by introducing species that have not evolved in Australia. Humans are only now recognising the interdependency of biodiversity networks and should work cautiously in designing bushfire mitigation to do the least harm to biodiversity.

Biodiversity is declining in Nillumbik at an alarming rate, as it is in Australia and worldwide. This is despite the apparent appearance of health of the bush. A closer, more scientific look is needed. If more information is needed the State of Environment Report for Victoria 2018 will assist. One statement from this report states:

** most species loss comes from practices such as grazing, tree clearing and fire protection on private land*

Ensuring the survival and improvement of biodiversity in Nillumbik will ensure a legacy for following generations. Any of the actions that appear in the final Strategy should recognise the validity of this statement from the report and attempt to rectify past bad practices.

Planning and Bushfires regulations in Urban areas of Nillumbik- in particular Eltham

Bushfire Planning controls put in place after the 2009 bushfires apply over the whole of Nillumbik. This blanket management process should now be refined in the light of recent adverse experience in Eltham, namely tree & vegetation removal on development sites.

Repeating the statement from the State of the Environment Report for Victoria 2018:

** most species loss comes from practices such as grazing, **tree clearing and fire protection on private land***

In urban areas tree clearing, under the guise of bushfire prevention legislation, is proceeding on a daily basis in Eltham.

Point 3 of the draft Bushfire Mitigation Strategy recognises *'that people of Nillumbik in the main live in the shire because of the communities' emphasis on natural environment.'*

People move to Eltham for the 'green and leafy' environment which is now being destroyed by developers at an alarming rate. The sound of chainsaws is a regular occurrence. When a block is sold, or even before the sale, the trees and other vegetation is removed – under State Government bushfire controls. Council cannot prevent this occurring.

Not only does the tree canopy give the admired aesthetic to the town but, as the town is part of the wildlife corridors from the Yarra along the Diamond Creek to the Kinglake Ranges, the 'leafy suburb' also acts as a buffer to the Green Wedge. It contributes to preserving and enhancing the biodiversity of the whole of Nillumbik.

We would like the opportunity at some time unrelated to this draft process, to discuss this issue further with Council officers as well as the State Government. Discussion and investigation will be important to see if it is possible to amend bushfire legislation to exclude urban areas in Nillumbik (and elsewhere in similar areas in Victoria) from current bushfire planning controls and bring Eltham into line with controls that exist in adjoining Manningham and Banyule. Such action is important before central Eltham loses its 'green and leafy' tree canopy and therefore the biodiversity of Nillumbik's Green Wedge is further compromised by the buffer being destroyed. Aerial photography comparisons over the last 10 years will easily demonstrate our concerns.

Sue Dyet

Secretary

Bushfire Mitigation Strategy 2019-2023

Overall Comment

This draft strategy is a welcome and broad ranging outline for Nillumbik Shire and its communities. So it is pleasing to see the emphasis on shared responsibility between the Nillumbik Shire Council and the community, as well as the emphasis on the community engagement approach to mitigate our bushfire risk. Together with other agency collaboration, and the encouragement of mutual respect for our joint concerns relating to bushfires and the environment, this draft clearly acknowledges and identifies the unique challenges faced within Nillumbik Shire.

Challenges

Community concerns about bushfire

I have a personal concern over the current **Leave or Live approach**. The word 'Leave' can be tricky as it has so many variables:

. **When?** : the day before; in the morning; when can see or smell smoke; told to leave

. **Where to?** : traffic; road access/egress; which direction

What ifs? : illness; another appointment; guests or visitors; pets and livestock; level of prior property maintenance; children at school – what's the school's policy?; waiting to be told what to do; unable to return for days. Any lack of planning, family input, or preparation can create a sense of panic which in turn can result in poor last minute decisions. The words "Leave and Live" sound simple but by necessity involve serious research, planning, family involvement, and decision making, rather than "Wait and See".

Comment on Operating principles

3. Shared Responsibility.

Community engagement is more successful when the community are active participants in the process of developing personal and community strategies to deal with the annual bushfire risk. I would also suggest that Schools and any Aged Care facilities are included in this process.

4. Reducing, managing and modifying fuels.

I believe that many in the general community have little awareness of the pivotal role fire intensity has on the ability to control a bushfire, in particular the relationship between fire intensity, fuel load and fuel arrangement. Any community engagement approach should include information on how to assess the fire risks on one's own property, for example, being aware of one's property regarding aspect, slope, size, boundaries, vegetation types and its arrangement and volume. Could information on the significance of these variables and how to manage your property in relation to clearing techniques to reduce fuel loads and hence fire intensity, be incorporated into the explanation and promotion of the 10/30 and 10/50 clearing exemptions. Would it then be appropriate to link this with the aboriginal approach to manage fire risk through their FireStick approach? In addition, is the BAL level to be included in this process? **(see also 1.7 under Objectives)**. Understanding these principles would give residents a clearer understanding of the fire danger ratings and show that not all bushfires in Nillumbik will be like Black Saturday of February 2009.

Residents need to recognise that fire, the environment and our local climate are inextricably linked. Changes in any of these can affect the others, both in the short and long term. What works in one year may not work in another. We also need to recognise the different knowledge and attitudes relating to the bushfire risk between long term residents and newer residents and consider how to bridge this gap.

Integrating this Bushfire Mitigation Strategy with Nillumbik's Green Wedge Management Plan is a vital component of these Operating Principles.

Comment on Objectives

1. Reduce number and impact of bushfire incidents

1.8 Regarding membership of the MFMPC

This definitely needs to be broadened as I believe many volunteer CFA brigades found it ineffective as information passed on to brigades was quite sporadic due the fact that the 13 Nillumbik CFA brigades were represented by one or two delegates, in addition to the fact that some local brigades had other priorities. Membership could include some commercial enterprises, neighbouring shires, tourism agencies, Green Wedge Management Plan representation, in addition to all local brigades.

In conclusion this draft plan clearly articulates the challenges that lie ahead both for the Nillumbik Shire Council and its diverse and lively communities.

Nan Oates

To Whom it May Concern

Thank you for the opportunity to contribute to Council's Bushfire Mitigation Strategy. I congratulate Council on the employment of Craig Lapsley to assist with this task.

Clearly this is a strategy for days of high, very high or severe fire danger. It is my opinion that no house is defensible on an extreme or Code Red day and there is considerable confusion in the community about this. Furthermore, the concept of a "defensible space" must be clarified as this is far from clear.

It is reassuring that this strategy is to be implemented in conjunction with Council's Emergency Management Future Directions Plan and the Green Wedge Management Plan.

I would like to respectfully suggest we avoid over dramatization of the problems of bushfire mitigation. The opening sentence of the Executive Summary, "Nillumbik Shire is one of the highest bushfire risk areas in the world" is not really accurate as the whole of South East Victoria comes under that category and this phrase could be interpreted as fear mongering and encouraging a "victim attitude".

That said the strategy must be underpinned with a clear recognition that Climate Change is creating more complex conditions with fewer opportunities for the sorts of burning regimes we have hitherto depended upon. Whilst a community focussed approach in which residents and landowners take responsibility for their own safety is desirable, allowing individual landowners to engage in controlled burns on their properties is fraught. Inexperienced burning can risk fire escape, endanger sensitive seed banks of grasses and ever declining wildflowers, nesting birds, invertebrates, echidnas and small

marsupials. How will biodiversity be “ensured”? Fire stick land management must only be attempted by experts who recognize and take into account evidence that biodiversity is in decline, and know how to protect it.

Policies such as the Australian Bushfire Policy and the Victorian Bushfire Strategy appear to be contradictory and should be clarified. People should know there are days when “stay and defend or leave early” is not appropriate advice. The Shire is responsible for providing access to the most up to date, authoritative advice on its website and via the media and social media. Vulnerable people need to be identified. Remember that more people died of heat related illness than died in the actual 2009 bushfires.

A “silo mentality” which many have complained about must be dealt with by our key agencies so coordination of these and the community is a commendable objective.

A recent survey found that 69% of people in Nillumbik live here because of the natural environment. I believe the use of the words “balancing environmental protection with bushfire risk” is an unfortunate phrase which seems to assume these two things are in competition. Many wrongly assume native vegetation increases bushfire risk but in fact clearing it causes higher ground temperatures, thus more intense bushfires. Treed areas can provide a microclimate which encourages condensation and rainfall. Many wrongly assume introduced plants are safer but in fact introduced grasses and weeds create a greater biomass. A weed control program is the first step towards bushfire mitigation in many parts of the Green Wedge.

The protection of human life must be prioritized. We need to reference the Victorian Bushfires Royal Commission Recommendations which warn about placing more people in some fire prone areas of the Shire. We must recognize that the biggest fuel loads on any piece of land are the house and other structures. The community needs to be reminded that the use of traditional methods of fire mitigation are still relevant, cleaning up around homes and sheds, removing vegetation in garden beds against walls, having a reliable water source, etc. I fear that the proposed education program on 10/30 and 10/50 will simply lead to more ill advised clearing and a false sense of security.

The challenges are many. “Treechangers” are a recognized phenomenon and need educating. Local real estate agents must be enrolled to acquaint newcomers with their responsibilities viz a viz bushfire preparation. Similarly, a large increase in Tourism could put more people at risk especially those who do not speak English and do not understand the dangers in bushfire prone areas, a factor recognized by VCAT in a recent disputed application for a large hotel in Warrandyte South.

Under “Objectives” may I remind Council that a “Community Values” Survey has already been done as preparation for the Green Wedge Management Plan. Reference to the GWMP should be made throughout the strategy.

As for future directions for emergency management, it is good to see that resilience in the community is considered of vital importance. The human costs of the 2009 bushfires are well known. The Council of the time did an excellent job, indeed it won an award for its response. Ten years on we have

dropped the ball. We should celebrate our volunteers better. Consultation and communication with the community is vital but is presently being conducted in a very selective fashion. It is Council's job to unify the community. Unfortunately, their professed aim of doing so with the Green Wedge Management Plan has not been successful.

Acknowledgment of my submission would be appreciated.

Yours faithfully,
Colleen Hackett

Sent from my iPad



Friends of Nillumbik Inc.

[REDACTED]

[REDACTED]

Submission to Draft Bushfire Mitigation Strategy, 27th May, 2019

Friends of Nillumbik Inc. (FoN) is a grassroots not-for-profit, community volunteer group. We have around 1000 supporters who live and work in the Shire of Nillumbik. The purpose of our association is to support and promote the environmental and landscape values, neighbourhood character, orderly planning and good governance of the Shire of Nillumbik.

FoN supports the priority given to the protection of human life, in all Victorian planning schemes.

The four Strategic Priorities (page 12)

We agree with the four strategic priorities.

Operating Principles (page 13)

Principle 1: Protection of human life. **We agree.**

Principle 2: Balancing environmental protection with bushfire risk. **We partially agree – comments below.**

Principle 3: Shared responsibility. **We agree.**

Principle 4: Reducing, managing and modifying fuels. **We partially agree – comments below.**

Comment on Principle 2: We question whether ‘balancing’ is appropriate in this context. It suggests the environment and bushfire risk will always be in competition. The truth is, they must be made to work together. Mitigation must operate to keep the environment both healthy and safer, rather than diminishing it. While much indigenous knowledge and practice has been lost, this dynamic appears to have operated for thousands of years in Australia. Principle 2 should be re-phrased. Maybe: “Integrating environment protection with bushfire mitigation”?

Comment on Principle 4: We question what a “holistic approach” means when considering fuel reduction across a range of land-types with different characteristics. If environmental values are to be protected then land containing high value bushland habitat will be treated differently from grassland, for example. What knowledge base will be used to identify sensitive land which should be managed differently in order that, “the shire’s unique flora and fauna are protected”? Fuel reduction techniques must be tailored to suit the environmental sensitivity of the land. A data base already exists in the ESO renewal completed by the previous council. Principle 4 should include a reference to the need for well founded data identifying land of environmental significance.

Objectives (page 14)

Comments:

Goal 1.3 and 1.4: On roadsides and council reserves the fuel reduction technique chosen must be appropriate for the vegetation type. Woody weeds and introduced grasses have a greater biomass than native grasses. Sensible fuel reduction treatment should work to favour native species. Oversight by botanists will be needed. We should encourage the planting of local grasses (e.g. *Themeda australis*, *Austrodanthonia linkii* etc) which stay green through the Summer months and do not produce the fuel loads of the introduced species. This would contribute to longer term fire mitigation benefits and should be actioned, as a priority, on public land.

Goal 1.5: Establishing an active indigenous burns program will be challenging due to the complete loss of local indigenous knowledge. There will obviously need to be trial programs with the careful collection of observation data and assessment of results over the long term.

Private land burn-offs present enormous risk. Firestick and drip burning must be in the hands of the professionals. In addition to the risk of escaped and out of control burn-offs, haphazard burning can exacerbate soil erosion and decrease run-off water quality leading to more problems to be solved. Haphazard and uninformed burning off can adversely affect both flora and fauna if performed incorrectly and at the wrong time of the year. Local expertise will best inform this strategy. For example, the data that the Bend of Isles Cooperative has accumulated over the 35 years of regular ecological burns is highly relevant.

Goal 1.7, 2.1, 2.2: While exemptions 10/30 and 10/50 are state-legislated and unlikely to change, we question whether they’re evidence-based. It seems that under extreme ‘Code Red’ conditions tree removal will make no difference, and with moderate conditions trees may help to keep the surrounds cool, catch embers and slowdown wind speed, apart from their amenity and habitat value. The education suggested under 2.2 must include the significant environment data base mentioned in the Principle 4 comment above (see Goal 2.5)

Goal 2.5: The extensive ESO review research undertaken under the previous council should be the basis of the education mentioned.

Goal 2.8: The content framework and tools for households could include encouraging residents to adopt a safer property layout with well-placed firebreaks and dense wind shield plantings. Mitigation is not all about less. Driveways can be situated to contribute to an effective firebreak. Smooth barked eucalyptus trees can act as heat shields for a structure. Well-watered green zones can play a part. Mineral earth abutting structures could be encouraged as a fire mitigation method. Reliable water access and publication of this resource to local brigades should be encouraged.

The management of the different “zones” on a property for their potential to slow and diminish the impact of a fire is essential. Riparian zones will need different management to the ridge lines. Taking into account the challenging topography of our Shire is essential. A one size fits all is not a desirable approach and must be avoided. Fence to fence slashing or burning is not an appropriate plan.

Goal 4.1: We suggest adding words to this goal. i.e. “Actively advocate to ensure legislation, policy and infrastructure investment meets the needs of the Nillumbik community,**and biodiversity protection.**”

Further comments on the draft:

In developing this Strategy, key directives and recommendations must be acceptable to the whole community. Council have an excellent opportunity to bring our community together during this period.

In a recent survey, an overwhelming majority of respondents stated that, “ the natural environment is a key reason that they chose to live here”. Planning for Nillumbik’s bushfire preparedness can be achieved alongside the goal of caring for the land and its people with an eye to preserving what is desirable about the ‘Green Wedge Shire’, for future generations.

.....

COMMENT on BUSHFIRE MITIGATION STRATEGY 2019 – 2023 by David and Jean Nicholls**MESSAGE FROM COUNCIL****DEFINITIONS****Bushfire mitigation**

I have no problem with the first sentence except that it invites a second, viz: This is particularly the case with the saving of human life but, in the case of the most severe fires, minimisation will probably not include loss of some property and wild and stock life and damage to the environment.

Challengers – Technology and Infrastructure

Inclusion of roads and bridges in consideration of infrastructure.

Many of Nillumbik roads, in character as their designation as minor or secondary roads, are narrow, hilly and twisty with blind corners. There is a large proportion of unsealed roads. The network has important pinch points, e.g Warrandyte and Hurstbridge. In an emergency there will be counter-flows of emergency and resident traffic. There are few opportunities for passing and slow vehicles such as horse floats will impede traffic. There is increased risk of blockage by accident and fallen trees. Blockage can be aggravated by Vic Roads barriers which can interfere with clearance.

Strategic Priorities

I agree with the 4 priorities. (I note that at point 1, Council has a particularly strong tool in regard to planning to avoid further housing in parts of our Shire, itself “one of the highest bushfire risk areas in the world”, in areas zoned of greatest danger.

Operating Principles

I agree with the choice of Operating Principles.

Objectives

Although this point may be covered by very general statements, bitter experience has taught us of the need for planning for post serious bushfire recovery. Staff at Shire carried out a great recovery role after Black Saturday and, hopefully, there is sufficient remaining to take advantage of this experience. This very serious phase deserves special mention. The need for local accommodation for rehousing after a fire event and its coordination should be mentioned.

BUSHFIRE MITIGATION STRATEGY - FINDINGS by CRAIG LAPSLEY

Of necessity this is a high level review with many actions in progress or required briefly described. Will there be an annual or 2 year update published on progress under headings that can be deduced from the report.

Could Council consider an annual report on seasonal outlooks for fire danger, particularly as a reminder to newer residents? This may need to be repeated in the season as criteria such as

temperature and dryness, paddock growth, major road works, etc change and affect the outlook. This report would underline current controls on private property burns and inform on any controlled cool burns.

I think that the value of Community Fireguard Groups should be mentioned more than once. I take this opportunity to thank CFA for their strong support of Fireguard and other information evenings. These are volunteers with increasing demands and challenges, some coming with climate change. I hope they receive all the support due, particularly in regard to recruitment and equipment.

Again, as a general comment, perhaps there could be a publication that rates indigenous plant species for their behaviour in bushfire, (if that information is available.) For example native grasses, pioneer species such as *Cassinia acuta*, now prolific in parts and trees including *Casuarina*.

David and Jean Nicholls

[REDACTED]

[REDACTED]

[REDACTED]

SUBMISSION BY: Cindy Allen

FOR: Bushfire Mitigation Strategy 2019 -2023

TO: Nillumbik Shire Council

I have read the Bushfire Mitigation Strategy 2019-2023 Version 1.10 along with Appendix 1 Emergency Management (Future Directions Plan) 18 April 2019. I would like the following points to be considered before the finalisation of the Strategy:

- My key position is that Nillumbik Shire cannot ameliorate the fire conditions and loads that occur from outside of our Shire. I speak of the surrounding Ranges and adjoining Shires, particularly to our North. Due to this fact, we must be realistic and balanced with the mitigation steps we deem applicable in this Shire.
- This Strategy should concentrate on measures that may decrease the impact of a fire event on Severe and Extreme Fire Rating Days.
- This BMS cannot not be seen to effectively “greenlight” indiscriminate vegetation clearing in this Shire. Council has an obligation to protect biodiversity and ecological viability. In determining a stance on vegetation removal for bushfire mitigation the best research documents and references should be sought. Information on the local status of our bushland is essential. Possible reference documents are: the Abzeco Report 2014; DELWP State of the Environment Report 2015 and the current GWMP Panel recommendations (note: where this GWMP document is deficient then refer to the Glossop Review 2015). In addition, VPP Clause 12.01 states ‘no net loss of indigenous vegetation’. This must also be addressed in this BMS. How Council adequately administer this Clause?
- Introduced weeds must be the first vegetation type to be removed as a fuel load contributor. Nillumbik should lead by example and master this practice in their own Council Reserves and local roadsides. Only then should indigenous vegetation be sought to be removed and reduced.
- Could reduction of the middle storey vegetation be preferable to the removal of understorey cover and our canopy trees during fire mitigation measures? Does the research support this supposition? All Community education measures should then reflect this order of priority for clearing/fuel load reduction.
- The 10/30 & 10/50 clearing concessions for vegetation removal are negated if residents replant with exotic plants and mulch with pine bark right up to their homes. Community education measures should include the emphasis of mineral earth and inflammables next to structures (e.g. scoria, paving). The concept of a “defendable space” requires the removal of everything flammable from immediately around homes.
- Attempts should be made to improve the image of mature trees and the role they could play in bushfire preparedness. There is much evidence suggesting that trees can protect homes from radiant heat and act as a wind shield during a fire event. Every other day of every year trees shade the earth, cool the ground and prevent moisture loss. These attributes can reasonably be seen to decrease the likelihood of

severe fires. Mature trees are of net benefit in the scope of bushfire mitigation. Council have a responsibility to correctly inform residents about the value of trees and not accept the continued demonization of them.

- Burning regimes could benefit the ecological health of Nillumbik land as well as decreasing fuel loads (if properly managed). How will Nillumbik regulate burns on private land? I do not think so called “firestick burning” should be in the hands of novices. Could this approach actually increase the likelihood of more “fire escapes?

Thank you for the opportunity to provide input for consideration.

Cindy Allen



From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Sunday, 26 May 2019 6:33:31 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Yes

Do you have any comments about any of the strategic priorities?

The strategic priorities are sound, however many of the principles, and goals do not appear to be well-aligned to these priorities. The description under Priority 1 could be improved to become "Improving bushfire mitigation across the municipality through improved prevention, planning and preparedness in ways that respect, protect and improve the condition of native vegetation and the biodiversity it supports"

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

Principle 2. "Balancing" environmental protection with bushfire risk, and the wishy-washy statement "Council will work to strike a balance.." are weak and easily open to misuse. Why not something like "All solutions to address bushfire risk will demonstrably seek to simultaneously protect and benefit the natural environment" Principle 4. Fuel loads are but one of many factors to consider when seeking solutions to bushfire risk. Elevating this to an operating principle above other factors will lead to an unbalanced approach to bushfire risk management, and likely an ineffective approach. Recommend remove this principle completely.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Strategic Priority 1. Reduce the number and impact of bushfire incidents. Reducing the number - Goal 1.2 is an ongoing cost to council - a better investment would be lobbying for, and contributing to the cost of, undergrounding of electricity cabling in high risk locations Goal 1.3 - how does a 'hazardous tree removal' program reduce the impact of a bushfire incident? The 'hazardous tree' program simply speculates the likelihood of a tree "posing an immediate risk to property or life" and then endeavours to 'make it safe'. The Nillumbik Roadside Management Plan Operational Guidelines states as an objective of 'hazardous tree removal' is to "Limit the potential for tree fall on to roads during fire events that could block egress or access" Given that healthy trees are also capable of falling unexpectedly, and in the event of a bushfire we know numerous trees (and power poles) are very likely to fall across a road, how can anyone assess the likelihood that any particular tree will be the sole cause of a road becoming impassable in the event of a bushfire sometime in the future? The addition of "...and maintain a hazardous tree removal program" to the end of this goal is illogical and should be removed. In practice, we are not being made any safer with the removal of large old roadside trees, but we are removing a critical habitat element for over 40 species of Nillumbik's native fauna - hollow-bearing trees. Craig Lapsley makes it clear in his report that "...only a small proportion of people actually make plans for what to do in the event of a bushfire." Increasing the number of people in bushfire prone parts of Nillumbik that have a detailed bushfire plan, and improving the quality of those plans to provide guidance in all circumstances, is a goal that is missing, and one that would go a long way to reducing the impact of a bushfire incident. Inherent in this would be detailed face-to-face guidance on how a bushfire is expected to behave under different weather scenarios, how to make your house and other buildings ember attack resistant, and helping individuals (especially the more vulnerable) be very clear on what their trigger is to 'Leave (and Live)' Goal 1.7 seems to leave all this to the CFA Community Fireguard

program - in many cases this is ineffective. A team of skilled people, providing one-on-one, face-to-face assessments of bushfire plan adequacy, and detailed advice on improvements, as well as clarifying the risks and consequences involved will be more effective in reducing the impact of a bushfire incident. It would increase the number of people in bushfire prone locations that really understand the risks they face, and how they can manage them. Goal 1.5 is commendable, but needs to be designed and delivered with active and ongoing involvement from the Wurundjeri people - it is their culture and traditional practices we would be utilising. Goals 2.1 and 2.2 fly in the face of the operating principle 'Balancing environmental protection with bushfire risk' by simply advocating for vegetation removal without any regard for environmental impact.

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

The draft document seems to view vegetation as the enemy, and as the only factor Council can address with respect to bushfire risk. Not only is this foolish, as it will result in ineffectual actions for community safety, it will also cause irreversible damage to our natural environment. The Nillumbik community places very high value on the natural environment and the services and benefits (including health) that it provides, and want to manage bushfire risk in environmentally-sensitive ways. Craig Lapsley made it clear that the State Emergency Management Priorities include "Protection of environmental and conservation assets that consider the cultural, biodiversity and social values of the environment." The Bushfire Royal Commission also urges Councils to "give due consideration to biodiversity conservation" Very little attention is brought to bear in this document on increasing the bushfire understanding, bushfire planning, and behavioural preparation in the event of a bushfire of individuals living in bushfire prone locations. Too many people imply they are 'prepared', yet in reality their preparation thinking and planning are grossly inadequate or absent. This risk factor needs much more attention than it currently gets. Another factor not addressed anywhere in this document is the need to use strategic settlement planning to simultaneously protect biodiversity while improving community resilience to bushfire risk. We need to address bushfire risk at the settlement scale rather than wait until an area is settled and then try manage the risk through the the subdivision and/or construction phase. In other words we need to actively discourage additional residential settlement in bushfire prone locations. One thing that can be done in this regard is to investigate and pursue options to consolidate into larger lots the numerous small lots in rural Nillumbik that have yet to be developed with a residential dwelling. Craig Lapsley identifies the need to 'engage with lobby groups', and specifies PALS and Friends of Nillumbik as groups with opposing views. There are many other community groups in Nillumbik, that may not be established as lobby groups but hold different views to either of these groups, and also need to be engaged. In the background information of the document, under the heading 'Historical management of bushfires' there are erroneous statements about how the Wurundjeri used fire to manage land. They did not "clear" land using the Firestick method, and they did not 'slash and burn'. Fire was used to ensure a sustainable supply of food and fibre resources, and typically was used to encourage grass and understorey growth. Under the section 'Challenges within the shire' the document rightly states that community have concerns about bushfire, and trauma from previous bushfires can feed this fear and

affect people's decisions and behaviour. There will be pressure for Council to take particular actions that arise from such fears - Council needs to be strong and clear, and make their decisions on sound evidence and science.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

You will be recorded as part of the meeting proceedings when addressing the Committee and your name printed in the minutes. The audio recording of the meeting will be published on Council's website.

The personal information requested on this form is being collected by Council if you wish to speak to a committee item. This information will be used solely by Council for that primary, or directly related, purpose. The applicant understands that the personal information provided is if you wish to speak to a committee item and that they may apply to Council for access to and/or amendment of the information.

PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Saturday, 25 May 2019 11:57:21 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

We believe there should be a fifth priority that given the nature of Nillumbik Shire & the green wedge to preserve the unique natural Environment that we have chosen to live in.
See further comments in summary.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

See summarysee summary

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

See summary

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

As long term residents of Nillumbik Shire in Bend of Islands and members of Christmas Hills Fire Brigade we are concerned that this draft policy has overlooked the importance of the very significant natural environment

, the green wedge, the lungs of Melbourne that we have chosen to live in. It appears that wholesale fuel reduction is seen as the panacea for managing bushfire risk.

As members of an active Fire Guard Group we realise the bushfire risks & practice environmentally conscious approach to protecting our property under the present guidelines and work to enhance environmental diversity in our area.

Generally we think the significance & the responsibility of living in a shire with the Green Wedge is sadly lacking from the draft.

Further we believe that we can learn a lot from Indigemois burning practices and urge NSC to investigate.

We would want environmentalists and conservationists to play a big role as key consultants in the whole process.

We urge the shire to protect our beautiful natural environment.

Liz & Peter Mildenhall

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

You will be recorded as part of the meeting proceedings when addressing the Committee and your name printed in the minutes. The audio recording of the meeting will be published on Council's website.

The personal information requested on this form is being collected by Council if you wish to speak to a committee item. This information will be used solely by Council for that primary, or directly related, purpose. The applicant understands that the personal information provided is if you wish to speak to a committee item and that they may apply to Council for access to and/or amendment of the information.

PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Mildenhall

First name (Required)

Liz & Peter

Organisation (If applicable)

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Sunday, 26 May 2019 5:55:21 AM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

I'd like to suggest an additional Strategic Priority that Bushfire Mitigation does not take priority over environmental protection

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

This could be the place to reinforce the principle that bushfire management needs to be considered as a component of promoting the overall health of the environment eg Principle 2 could state that "Bushfire management enable/promote environmental

protection”, rather than being presented as a balance between the two.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

I have some suggested refinements to the Strategic Priority wording, as below: Strategic priority 1 - Reduce the number and impact of bushfire incidents Improving bushfire mitigation across the municipality through improved prevention, planning and preparedness, whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress. Strategic priority 2 - Creating a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity. Stop viewing vegetation solely as something that burns and is a threat, but come to understand trees and vegetation in terms of eg. air, soils, water, micro-climates, shade, habitat, biodiversity, ecosystems. Again noting that vegetation has the potential to reduce fire risk. EG: On roadside reserves introduced grasses (eg Phalaris) and weeds (eg blackberries) generally have a far greater biomass (read fuel load) than indigenous grasses eg Poa, Kangaroo Grass. So when mapping for burning off for fire mitigation purposes look at the plant type first. Relevant to Goals 2.3, 2.4, 2.5
Recognising that we know very little about the complexities and inter-dependencies of the web of life, we therefore need to practice the 'precautionary principle'. Eg Fire mitigation should reflect nature so only slash native grasses after they have seeded and any burning off in bush areas should be cool burns and not occur every year for example, relevant to Goal 2.4 Bushfire management must support protection of lower & medium storey indigenous vegetation, which provide very valuable habitat and food for wildlife. Nillumbik people love local wildlife and to be successful with fire mitigation, like many other issues, Council should listening to the residents. Relevant to Goals 1.4. 2.3

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

Recognition of biodiversity within the “Challenges within the Shire” only acknowledges the importance of biodiversity as it is valued by the community. There are many other urgent and compelling reasons to maintain and where possible improve biodiversity. The recently released UN Global Assessment of biodiversity highlights the universal importance of biodiversity and our responsibility towards future generations.
<https://news.un.org/en/story/2019/05/1037941> The State of the Environment Report for Victoria 2018 echos this finding that (amongst other things) Victoria's biodiversity is rapidly deteriorating in many parts of the state, with invasive species including cats, foxes, rabbits, carp, deer and horses are growing in number and populating greater areas. Most species loss comes from practices such as grazing, tree clearing and fire

protection on private land. <https://www.ces.vic.gov.au/sites/default/files/SoE-2018-summary-report.pdf> No strategic priority addressing increase in “tree-changers” noted in the Challenges section. The State Government in its subsequent Planning Scheme amendment for the Bushfire Management Overlay (BMO) clearly states that the strategic planning process is the most effective planning mechanism to protect biodiversity while improving community resilience to bushfire risk. Settlement planning is at the heart of this strategic planning and: “..... requires authorities to address bushfire risk at the settlement scale rather than delaying bushfire protection until the subdivision and/or construction phase.” I suggest an additional principle that states that all strategic priorities and goals will be supported by evidence and that the evidence informing each goal will be made transparent.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

FRAMPTON

First name (Required)

ANDY

Organisation (If applicable)

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Support

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This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Participate Nillumbik.

From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Sunday, 26 May 2019 12:39:21 AM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

Important additional strategy is the retention and protection of the bio diversity of the natural environment with fuel reduction

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

The backbone of these principles should be to protect the unique natural environment and not allow panic clearing

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

2.7 & 2.8

It should be emphasized to all about the importance of the natural environment on their properties and the benefits of its conservation whilst reducing fuels

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

Do not panic the community

Make sure there is a balanced educational process that includes up front the conservation of the unique biodiversity of what is in Nillumbik. It must be a scientific approach from expert Fire ecologists. Not emotional scare merchants resulting in indiscriminate clearing

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

Yes

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Henry

First name (Required)

Ross & Christine

Organisation (If applicable)

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Support

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Thursday, 23 May 2019 1:58:21 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

I would like to add that bushfire mitigation does not take priority over environmental protection.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

I think bushfire management could be considered as an enhancement to the overall health of the environment. For example Principle 2 could state that "bushfire management enable/promote environmental protection" rather than being presented as

a balance between the two.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

- Strategic priority 1 - Reduce the number and impact of bushfire incidents Improving bushfire mitigation across the municipality through improved prevention, planning and preparedness, whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress.
- Strategic priority 2 - Creating a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity.
- Stop viewing vegetation solely as something that burns and is a threat, but come to understand trees and vegetation in terms of eg. air, soils, water, micro-climates, shade, habitat, biodiversity, ecosystems. Again noting that vegetation has the potential to reduce fire risk. EG: On roadside reserves introduced grasses (eg Phalaris) and weeds (eg blackberries) generally have a far greater biomass (read fuel load) than indigenous grasses eg Poa, Kangaroo Grass. So when mapping for burning off for fire mitigation purposes look at the plant type first. Relevant to Goals 2.3, 2.4, 2.5
- Recognising that we know very little about the complexities and inter-dependencies of the web of life, we therefore need to practice the 'precautionary principle'. Eg Fire mitigation should reflect nature so only slash native grasses after they have seeded and any burning off in bush areas should be cool burns and not occur every year for example, relevant to Goal 2.4
- Bushfire management must support protection of lower & medium storey indigenous vegetation, which provide very valuable habitat and food for wildlife. Nillumbik people love local wildlife and to be successful with fire mitigation, like many other issues, Council should listening to the residents. Relevant to Goals 1.4. 2.3

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

- Recognition of biodiversity within the “Challenges within the Shire” only acknowledges the importance of biodiversity as it is valued by the community. There are many other urgent and compelling reasons to maintain and where possible improve biodiversity. The recently released UN Global Assessment of biodiversity highlights the universal importance of biodiversity and our responsibility towards future generations. The State of the Environment Report for Victoria 2018 echos this finding that (amongst other things)
 - o Victoria's biodiversity is rapidly deteriorating in many parts of the state.
 - o Most species loss comes from practices such as grazing, tree clearing and fire protection on private land.
- No strategic priority addressing increase in “tree-changers” noted in the Challenges section. The State Government in its subsequent Planning Scheme

amendment for the Bushfire Management Overlay (BMO) clearly states that the strategic planning process is the most effective planning mechanism to protect biodiversity while improving community resilience to bushfire risk. Settlement planning is at the heart of this strategic planning and: “..... requires authorities to address bushfire risk at the settlement scale rather than delaying bushfire protection until the subdivision and/or construction phase.” • Suggest an additional principle that states that all strategic priorities and goals will be supported by evidence and that the evidence informing each goal will be made transparent.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Object

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This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Participate Nillumbik.

From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Saturday, 25 May 2019 3:35:23 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Yes

Do you have any comments about any of the strategic priorities?

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Yes

Do you have any comments about any of these operating principles?

Number 2: is presented as an either or, by using the word balance. Balance indicates a middle ground between 2 poles. There is much evidence that good land management is a win win for fire reduction and environmental protection. Indigenous fire management is central to this, not a side note.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

Leave and live is fantastic, but there are significant barriers. Where do people go, especially those with families? adolescents can be particularly hard to convince to leave for days on end. Living away from home is expensive, especially in heat wave conditions. Community strategies that tackle these challenges are long overdue, people will not leave their cool homes the night before if they have nowhere to go. Not everyone has a city apartment to escape to or adequate family support.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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<https://participate.nillumbik.vic.gov.au/index.php/dashboard/reports/forms/viewDetail/123>

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Friday, 24 May 2019 5:31:34 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Yes

Do you have any comments about any of the strategic priorities?

In my opinion, I believe the greatest difficulty is getting community involvement! It is always the same few that contribute and endeavor to get members of the community to take ownership and be part of the planning process. Again, in my experience, many community members appear to believe that they know what to do, how to do it and when to do it, in any future fire! This is regardless of age!

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Yes

Do you have any comments about any of these operating principles?

I agree in principal with all 4 points. However, i believe that a number of community members where I live do not trust different agencies or truly believe they have been listened to in the past or will be listened to in the future! 2 and 4: Huge, huge points!!! I can drive down almost any road in and around where I live and the roadsides are a disgrace! There are many roads where there is a real risk of trees falling across roads due to rotted trunks or the trees are balancing on fallen away banks. Shrubs and bushes are overgrown and , until recently, the grass was long. I agree that private land needs to be included in considering fuel and vegetation reduction. I live on a property where trees fall whenever there is a strong wind.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

1.2 Go underground with power lines! 1.3 Absolutely! There are hazardous trees that must be removed! Roadside vegetation must also be slashed! eg corner of Caledonia Street and School Road in St Andrews. 1.6 Yes 1.7 Some areas/ private properties may require more than the 10/30 or 10/50 criteria and could be looked at on an individual basis! 2.1 see 1.7 2.2 YES 2.4 YES BE FLEXIBLE for individual properties. 2.6 YES a must! 3 a lot of words!! 4.2 an absolute priority to ensure communication in an emergency!

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

I think it was a very well written piece. I found the detailed statistics on fatalities fascinating. I agree with Mr Craig Lapsley that community ownership is vital but do not know how you can create that involvement. I am concerned that there are many people who still do not agree with climate change (eg many politicians!!) and this may make this draft difficult to implement! Inthe earlier pages of this Draft there is mention of tourists and visitors to these areas on fire risk days to eg B&B's, wineries etc and I think there is room for some well written info that could be handed out routinely to such people! Roadside vegetation management and fuel reduction will mean Nillumbik might have to look at some of their strict criteria ! Could someone wave information on 'Cool Burns' in their faces! A tried and true method historically! This is my feedback on the Draft.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Kaye

First name (Required)

Jane

Organisation (If applicable)

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Support

To view all of this form's submissions, visit

<https://participate.nillumbik.vic.gov.au/index.php/dashboard/reports/forms/viewDetail/123>

From: [Engagement](#)
To: [emmatters](#)
Subject: FW: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Monday, 27 May 2019 4:08:12 PM

Submission 5996

From: no-reply@harvestdp.com <no-reply@harvestdp.com>
Sent: Tuesday, 14 May 2019 3:45 AM
To: Engagement <engagement@nillumbik.vic.gov.au>
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

[Four strategic priorities](#) will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

No

Do you have any comments about any of the strategic priorities?

The priorities say nothing about either protecting or enhancing biodiversity or any other environmental aspects of the countryside. In priority 1, add at the end ", whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress". In priority 2, add at the end "that also ensures protection of native vegetation and promotion of biodiversity." Somewhere, recognise that vegetation has many benefits which are highly valued by many people in Nillumbik and that bushfire management must also support such vegetation and other aspects of the environment.

OPERATING PRINCIPLES

[Four operating principles](#) will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Yes

Do you have any comments about any of these operating principles?

OBJECTIVES

Each of the four strategic priorities has been allocated high-level [objectives](#) (goals) that

will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

There are too many goals. As written, they simply obscure the desired direction of travel and effectively allow the implementors to pick and choose whatever they want for implementation.

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

As implied above, there is not sufficient recognition of what makes Nillumbik a place that people want to live in (wildlife, vegetation, trees, scenery, etc) and how management of bushfire risks progress hand in hand with protection of the environment.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Palmer

First name (Required)

Guy

Organisation (If applicable)

Phone number (Required)

██████████

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: [Engagement](#)
To: [emmatters](#)
Subject: FW: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Thursday, 16 May 2019 3:30:23 PM

From: no-reply@harvestdp.com <no-reply@harvestdp.com>
Sent: Monday, 13 May 2019 2:52 PM
To: Engagement <engagement@nillumbik.vic.gov.au>
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

[Four strategic priorities](#) will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

On page 12 of the strategy, it states "create and implement a range of effective community engagement and information mediums and sources for use by households and communities so they are able to make better decisions and be better prepared before, during and after a bushfire."

I think the mention of information media here is naive and simplistic. We know that providing the community with information is simply not effective. While it "may" increase knowledge (although even that is debatable) it is ineffective at creating behaviour change. The focus of community partnerships needs to be taking a community-based approach which allows the community the power to determine how they would like to see their bushfire risk reduced. This is the premise of the very successful Safer Together "Community-Based Bushfire Management" project, which is being undertaken in 23 communities in Victoria - including Nillumbik's own St Andrews. There needs to be more focus on community empowerment and a lot less on agency-led endeavors.

OPERATING PRINCIPLES

[Four operating principles](#) will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk

management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

None of the four operating principles will be successfully undertaken without community collaboration and a sense of empowerment or ownership. As such, this should be the principle underlying all of the operating principles for this strategy - especially considering the large proportion of privately owned land in Nillumbik. There is also little to no mention of residual risk throughout this document. Reduction of residual risk is now the main driver of burn and veg management planning across Victoria and it is important that the people of Nillumbik understand the difference between this and hectare-based burning. There is still a belief in some parts of the community that more veg management (via more burning) is the way to promote safety, without understanding the nuances associated with residual risk based control measures. This is an important distinction which the community need to understand, otherwise there is frustration.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

1.1 This is the first mention of arson in the entire document. As there are no mentions of it earlier in the document, it is difficult to know how much of an issue this is. There is no point in providing a goal when the context of the issue is not understood. Also, how much of an arson-reduction program relates to the current work of VicPol? Would the Shire not be better supporting well-marketed and recognised programs such as the current VicPol arson reduction program?

1.2 Again, little context - how much of an issue are power lines? And is this the job of Shire of Ausnet?

1.3 Describe the importance of the roadside focus. Again, no context.

1.4 How much of the Shire land does this pertain to given the comments earlier regarding the large amount of privately owned land? Is the Shire resourced to be a "role model"? There is nothing worse than being promised something and not delivering.....

1.5 Who will lead traditional burns on private land? Or are you going to fund community members to undertake training (eg. the firesticks program)? Sounds lovely, but is it a realistic goal? And don't expect CFA volunteers to assist with this one!

1.6 This is a huge piece of work in itself...will community be able to participate in this? Again, it is imperative that community feel they have a sense of ownership over any such plans, so perhaps make these very collaborative pieces of work.

1.7 The CFG Program is wonderful and should be encouraged. How does the Council propose to do this though? There is a lot more than tokenistic marketing assistance required here.

1.8 Are there currently community members on this committee? There should be! Also, how do nominations currently get called? What sort of process is gone through to ensure adequate representation?

1.10 Facilities such as these are really only applicable in the event of people leaving it too late to evacuate when threatened with an emergency (eg. fire). Would resources not be better expended on other, behaviour-change focused strategies? This also sounds expensive....

1.11 Again, very expensive...and if people can safely make it to an NSP, should they not just keep going? NSPs are rarely within 100m of a home, so people will have to travel to get there. This is not a message congruent with current fire agency messaging around survival. Again, would money be better spent on work which empowers community and encourage behaviour change?

2.1 Promotion of fuel reduction sounds very words-based and like a traditional educational program. This is not an effective approach....again, let the community take the lead on something like this. Increasing green waste provision is essential - great approach.

2.2 We already have a community bushfire mitigation program....it's called Community Fireguard. Instead of creating "yet another" program, why not focus efforts on expanding CFG and then implementing the bushfire mitigation education into that? CFG has benefits far beyond bushfire and makes communities more resilient generally, so it would be a much better investment option. Most CFG Facilitators already do this work anyway - including discussing the 10/30 and 10/50 rights.

2.3 A lovely idea, but again, a bit of a token effort. One forum will not build trust with community and will only draw out the same "squeaky wheels" from the community. To create a program which truly reflects the community's wishes, a lot more time needs to be spent on this type of activity. Set up some drop in sessions at the most popular coffee places around Nillumbik and allow the time and space for one-on-one conversations. Then form a community focus/reference group and try hard to encourage some normally unheard voices to be included in an advisory group.

2.4 A nice idea, but it sounds expensive and in reality, what proportion of the community will engage with this type of tool? What will have the most impact considering what appears to be a limited budget?

2.5 Or, why don't you continue to promote and support CFG and bring along some ecologists or Parks Vic or FFMVic to the CFG meetings so biodiversity and environmental outcomes can be discussed? People will come because they have a relationship with their CFG Facilitator.

2.6 There needs to be clarity here. CBEM (and CBBM) are community-based approaches which allow the community to determine what goes in the plan. The wording at the start of this goal states "develop plan for the community...". This is not how CBEM and CBBM work and there needs to be a clear delineated and understanding of the two approaches. Please don't "do" anything else for or on behalf of community - let them take ownership of the processes!

2.8 AGH! Reinventing the wheel! There is a ton of material and tools already available. Don't spend more money on more tools....spend money on staff who will have conversations and help people to understand their risk and then take some action to change their behaviour. More tools is NOT the answer.

2.9 A lovely idea, but do you have evidence that this will work in Nillumbik? It is a huge challenge for CFA to retain volunteers in the urban fringes, so would this approach face the same challenges? Does this need better scoping?

3.1 Who is working with agencies? Community need to be at the centre of this process otherwise they won't buy it!

3.2 I think this is a bit ambitious considering the timeline of this strategy. It's hard enough to get all agency personnel together in the room, let alone have similar objectives. Now you want them to have all their plans consistent and aligned to the MEMP? This may need some more time...

3.3 To make sure it is compliant and fit for purpose.

3.4 Again, sorry to bang on, but where's the community's voice here? It is imperative that they are at the centre of these discussions. If you want the community to buy the plan they have to be a part of creating the plan.

3.5 What do the Terms of Reference for this group state? If the group needs shaking up, then the ToR need to be written in such a way as to allow this to happen. I could almost guarantee that there are very many people in the community with great experience and ideas who would be more than willing to contribute to these committees.

3.6 As long as the external evaluation mentioned earlier shows that they are doing an adequate job. If they are not, then there should be a contingency plan.

4.3 Are you "creating" or "using" evidence-based approaches here? You have stated creating, but again, don't reinvent the wheel - look to use evidence-based approaches which have already shown efficacy in this space.

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

No, I think I've written enough! I am happy to discuss my comment however. I would like to be able to speak to my submission at the FNC meeting on 11 June, however I will be at a conference for work. As mentioned, I am happy to discuss them at another time.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

You will be recorded as part of the meeting proceedings when addressing the Committee and your name printed in the minutes. The audio recording of the meeting will be published on Council's website.

The personal information requested on this form is being collected by Council if you wish to speak to a committee item. This information will be used solely by Council for that primary, or directly related, purpose. The applicant understands that the personal information provided is if you wish to speak to a committee item and that they may apply to Council for access to and/or amendment of the information.

PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Macken

First name (Required)

Fiona

Organisation (If applicable)

Nillumbik resident, CFA volunteer, CFA employee

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: [Engagement](#)
To: [emmatters](#)
Subject: FW: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Thursday, 16 May 2019 3:30:32 PM

From: no-reply@harvestdp.com <no-reply@harvestdp.com>
Sent: Wednesday, 15 May 2019 3:13 PM
To: Engagement <engagement@nillumbik.vic.gov.au>
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

[Four strategic priorities](#) will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

*Bushfire Management needs to be integrated with considerations of how it contributes to promoting the overall health of the environment

*Managing Fire in the landscape is about caring for the land, its ecosystems with all the life it supports, including flora & fauna & not limited to people -- .

*Viewing management of land through the fire risk mitigation prism is likely to lead to gross environmental mismanagement. Longterm protection of indigenous vegetation & support for biodiversity should be integrated throughout document . *
 vegetation has potential to contribute to fire elimination of fire risk through cooling the land and increasing local rainfall

Biodiversity is declining at an alarming rate in Nillumbik, Victoria & worldwide. SEE State of environment report for Victoria www.ces.vic.gov.au/sites/default/files/SoE-2018-summary-report-pdf. SEE ALSO UN Global Assessment of diversity .

OPERATING PRINCIPLES

[Four operating principles](#) will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

No 2 Should reconsider priorities -bushfire management needs needs to be considered as a a component of of promoting overall environmental health so could be stated thus "Bushfire management to enable or promote environmental protection." rather than being a balance of the two.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

1.Reduce the number & impact of bushfire incidents improving bushfire mitigation across the municipality through improved prevention, planning and preparedness , whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress.

2. creating a community focussed approach to bushfire that also ensures protection of native vegetation & promotion of biodiversity.2;3,4.5.Recognise vegetation not solely something that burns & a threat but come to understand trees ,vegetation in terms of air, soils, water, microclimates, shade,habitat, biodiversity, ecosystems. Vegetation has potential to reduce fire risk EG on roadside reserves , introduced grasses (EG phalaris),weeds,(blackberries),have greater biomass or fuel load than indigenous grasses --eg Poa, Kangaroo grass . So when planning burnoffs, for fire mitigation purposes look at plant type first.Use precautionary principle , follow nature-only slash native grasses after seeding has occurred, & cool burns should be used in bush & not every year.2.4 *Bushfire management must support protection of lower & medium storey indigenous vegetation--which provide habitats & food for wild life
Nillumbik people love their local wild life & to be successful with fire mitigation Council should listen to residents.

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

*Challenges:Universal recognition of biodiversity --Victoria's biodiversity is rapidly deteriorating *with invasive species, -cats, rabbits, deer, foxes, carp, growing in number, populating greater areas. *MOST SPECIES LOSS comes from practices such as tree clearing ,overgrazing, and fire protection on private land.(State of Environment report for Victoria 2018)}

* Research how indigenous burns work. It's NOT slash & burn but carefully planned patch burning ,periodic cool burns, limited by unburnable vegetation. .

On a recent tour in NT, indigenous people explained this principle & demonstrated how it works in the bush we were visiting.

* CONSIDER "Tree changers "--State Govt. planning BOM -:requires authorities to address bush fire risk at planning & settlement stage rather than delaying bushfire protection until subdivision & construction stage" .

Suggest:All strategic priorities & goals need to be supported by evidence & such evidence will be transparent.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 3:08:20 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

The current Draft Strategy refers to the 'environment' but does not define its 'value', economic or otherwise. Nillumbik is a green shire and it's why we live here. It is this natural environment that sets Nillumbik apart. We have a responsibility to ensure that we don't destroy the very qualities that make it so special. We have a responsibility to manage and protect the native environment values for the future.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

The draft presents fire and the environment as conflicting options. Fire management can be used to enhance the quality and biodiversity of the natural environment. The Australian bush is a 'fire' dependant eco system. Fire management and native vegetation protection MUST be addressed as complimentary issues. The strategy priorities should include a further requirement to "Ensure all work protects native vegetation and maintains biodiversity." The State of the Environment Report for Victoria 2018 highlights that Victoria's biodiversity is rapidly deteriorating and the Strategy needs to address this with regard to best practice fire management. Community education with a strong focus on new residents is required. The concept of self-reliance in a bushfire event is promoted by the CFA.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on

Council's website

Surname (Required)

Bonny

First name (Required)

Alan

Organisation (If applicable)

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Monday, 27 May 2019 3:10:21 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

I am the President of the Bend of Islands Conservation Association (BICA), and I strongly support the Council's initiative in preparing a BMS, however I feel that the following issues need to be incorporated into the Strategy: The current Draft strategy refers to the "environment" but does not define its' "value" including its' economic value. It is this environment that sets Nillumbik apart. It is why we live here, and we need to ensure that we don't destroy the very qualities that make it so special. The current Draft is on an "either-or" basis for Fire Safety verses Environmental preservation. However, this is not necessarily the case. Mitigation strategies can be developed to enhance the quality and biodiversity of the environment. This needs to be reflected in two strategic priorities: 1. Reduce the number and impact of bushfire incidents improving bushfire mitigation across the municipality through improved prevention, planning and preparedness, whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress; 2. Creating a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk

management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

The bush must not be purely seen as something that burns and is a threat. Trees and vegetation must be understood in terms of air, soils, water, micro-climate, shade, habitat, biodiversity and ecosystems. In some instances, native vegetation has the potential to reduce fire risk, especially when compared with weed infestations that can have a far greater bio-mass. Our declining biodiversity must also be duly recognised with regard to best practice fire management. The State of the Environment Report for Victoria 2018, highlights that Victoria's biodiversity is rapidly deteriorating and the strategy needs to address this.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

1.7 New residents to the area must be educated in appropriate vegetation control/weeding. Community education is vital to avoid over-zealous clearing of bush-land.

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

We know very little about the complexities and inter-dependencies of the web of life, and we therefore need to practice the "precautionary principle", with regard to bushfire mitigation.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

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Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Support

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 2:16:22 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

The strategies should also include the valuing of the natural environment and balancing this against the need to protect assets.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Yes

Do you have any comments about any of these operating principles?

Operating principle 2 should be developed to stress the importance of the natural environment in Nillumbik

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

1.6 it is important that any fire reduction burns take into account the impact on the flora in the area e.g. particular orchid species should not be burnt at particular times

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

Thank you for preparing it - it is positive and thoughtful but requires a greater emphasis on the environment. Balancing the needs of the environment and safety of human assets can be done effectively.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Duff

First name (Required)

Robyn

Organisation (If applicable)

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Support

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From: no-reply@harvestdp.com
To: [ematters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 2:00:19 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

Bushfire mitigation priorities must include environmental protection .

Priority 1 and 2 both need to also ensure that all the works protect native vegetation and promote biodiversity of species.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

Bushfire management must also enable/promote environmental protection

It must recognise that vegetation is not solely something that burns and therefore a risk

but is rather more complex. It has vital relationships with life, air, soils, water, climate, ecosystems etc. Therefore there is a need to develop a more holistic approach to the management of a fire threat.

In some instances, native vegetation has the potential to reduce fire risk, especially when compared with weed infestations that can have a far greater biomass.

The challenge of Climate Change presents the challenge developing land management strategies to protect the environment while managing the fire risk. More research needs to be done.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Goals related to SP1 must include more research into management for retention of native vegetation and maintenance of biodiversity so that we really do promote best practice in our Strategy.

Goals related to SP2 Support essential Community engagement . Need strong emphasis on repeated and ongoing education for current and new residents.

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

I support the Council's initiative in developing this Strategy.

However I believe that there is an important issue that has been overlooked in outlining the challenges within the Shire. The section on the Economy does not give any recognition to the environment. The reason why most of us live in Nillumbik, is the environment. The reason there is an Artisan Hills concept, is the environment. The reason Melburnians know, appreciate and visit or even drive through Nillumbik, is the environment. THE ENVIRONMENT HAS ECONOMIC VALUE and requires recognition and a best practice fire mitigation strategy for its and its resident's protection.

•

- The current Draft Strategy refers to the 'environment' but does not define its 'value', including its 'economic value'. It is this environment that sets Nillumbik apart. Its why most of us live here and we have to be so careful that we don't destroy the very qualities that make it so special

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

You will be recorded as part of the meeting proceedings when addressing the Committee and your name printed in the minutes. The audio recording of the meeting will be published on Council's website.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Mattiske

First name (Required)

Janet

Organisation (If applicable)

Phone number (Required)

██████████

Email (Required)

████████████████████

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

To view all of this form's submissions, visit

<https://participate.nillumbik.vic.gov.au/index.php/dashboard/reports/forms/viewDetail/123>

From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Monday, 27 May 2019 9:05:31 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

I am a resident of the Bend of Islands and a member of the Round the Bend Conservation Co-operative and the Bend of Islands Conservation Association (BICA). I strongly support the Council's initiative in preparing a BMS however I consider that Draft Strategy does not give sufficient emphasis to protecting Environment Preservation. Obviously, with the impact of climate change, bush fire risks are rising. However the important issue of Fire Safety needs to be cognisant of the equally important issue of conservation of biodiversity that is also facing challenges because of climate change and loss of biodiversity through urban and per-urban development. The current Draft is on an 'either-or' basis for Fire Safety verses Environmental Preservation. This is not necessarily the case. Mitigation strategies can be developed to enhance the quality and biodiversity of the environment. This needs to be reflected in the 1st two Strategic priorities by making the following additions:

- 1 - Reduce the number and impact of bushfire incidents improving bushfire mitigation across the municipality through improved prevention, planning and preparedness, whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress.
- 2 - Creating a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity.

Other points that require emphasis/inclusion are:

- • Recognition that we know very little about the complexities and inter-dependencies of fire and fire prevention and its positive and negative effects on

biodiversity. For this reason we need to adopt a 'precautionary principle'. • Vegetation should not be viewed solely as something that burns and is a threat. Greater recognition should be given to the value of trees and vegetation in terms of e.g. air, soils, water, micro-climates, shade, habitat, biodiversity, ecosystems. It should be noted, for example, that in some instances, native vegetation has the potential to reduce fire risk, especially when compared with weed infestations that can have a far greater biomass. • Our declining Biodiversity must also be duly recognised with regard to best practice fire management. The State of the Environment Report for Victoria 2018 highlights that Victoria's biodiversity is rapidly deteriorating, further exacerbated by the added impact of climate change. The Green Wedge is a major asset in the arresting loss of biodiversity and should receive high priority in developing a bushfire management strategy. I request that Council considers these issues and revises the Draft Strategy to included appropriate emphasis on the value of the environment and its biodiversity in the areas of natural environment within the Green Wedge.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

See comments above

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

See above

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

See above

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Roberts

First name (Required)

John

Organisation (If applicable)

Member of The Round the Bend Conservation Co-operative and the Bend of Islands Conservation Association

Phone number (Required)

██████████

Email (Required)

████████████████████

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Participate Nillumbik.

From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Monday, 27 May 2019 8:08:21 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Do you have any comments about any of the strategic priorities?

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Do you have any comments about any of these operating principles?

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

This submission is presented by the Round the Bend Conservation Cooperative (RTBCC). RTBCC is an area of exceptional biodiversity. It is located in the Bend of Islands (BoI) in the southeast corner of the Shire and is covered by the unique planning provisions, 'SUZ2 - Environmental Living – Bend of Islands', which supports the concept of Residential Conservation.

We strongly support the Council's initiative in preparing a BMS however we consider that it is particularly important that the following issues are incorporated into the current draft Strategy.

- The current Draft Strategy refers to the 'environment' but does not define its 'value'.

This is particularly important as the term clearly means different things to different people. It is the high-quality natural environment that sets Nillumbik apart. It's why most of us live here and its value needs to be clearly articulated. We have to be so careful that we don't destroy the very qualities that make our Shire so special. The 'economic value' of the environment should also be spelt out.

- The tone of the current Draft is on an 'either-or' basis of Fire Safety versus Environmental Preservation. This is not necessarily the case. Mitigation strategies can be developed to enhance the quality and biodiversity of the natural environment. This needs to be reflected in the 1st two Strategic priorities as follows: -

- 1 - Reduce the number and impact of bushfire incidents.

Improving bushfire mitigation across the municipality through improved prevention, planning and preparedness, whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress.

- 2 - Creating a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity.

Create and implement.....

Other points that require emphasis/inclusion are: -

- Recognition that current knowledge of the complexities and inter-dependencies of the web of life is significantly incomplete. We therefore need to practice the 'precautionary principle'.

- Stop viewing vegetation solely as something that burns and is a threat. All stakeholders need to understand trees and vegetation in 'ecosystem' terms of e.g. air, soils, water, fungi, micro-climates, shade, habitat, biodiversity. The BMS is an ideal opportunity for the Shire to promote this message to all involved. It could also be noted that in some instances, native vegetation has the potential to reduce fire risk, especially when compared with weed infestations that can have a far greater biomass.

- Our declining Biodiversity and the increased fire risks associated with Climate Change,

must also be duly recognised with regard to best practice fire management. The State of the Environment Report for Victoria 2018 highlights that Victoria's biodiversity is rapidly deteriorating and the Strategy needs to address this.

- The implications associated with 'catastrophic weather conditions' (Extreme and Code Red Days) need to be much more clearly spelt out. Fire behaviour on these days can negate the best prepared plans for a 'normal bad day'. All residents should be encouraged to have a written, well thought out 'individual property fire plan' with clearly defined triggers for 'leaving early' when appropriate.

- Community education is fundamental to the success of any BMS, with a specific strategic policy to address "new" residents to the area.

RTBCC requests that Council considers these issues and revises the Draft Strategy to include appropriate emphasis on the value of the environment and its biodiversity in the areas of natural environment within the Green Wedge.

Regards

Frank Pierce

for Round the Bend Conservation Cooperative

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Pierce

First name (Required)

Frank

Organisation (If applicable)

Round the Bend Conservation Cooperative

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Monday, 27 May 2019 7:46:20 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

I do agree with the four strategic priorities, however, I do not support the prevention of new developments under the disguise of excessive bushfire risk

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

Fuel reduction, in my opinion, has been a severely neglected aspect of the council, and state governments, fire preparedness. Despite it being part of a bushfire royal commission recommendation. To see meaningful fuel reduction on council managed

land and especially road side vegetation would be welcomed. A environmental priority I feel is given too much importance.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

surprisingly, I agree with the goals presented. It appears to be focused on meaningful preparedness and is somewhat of a change from the previous councils direction.

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

CFA should not be a referring authority for Nillumbik Planning. Council is authorised to approve planning submissions without CFA referral. I'm unsure why council continues to refer all applications.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Monday, 27 May 2019 6:20:21 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that

will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

Norman Parris [REDACTED] 27 May 2019 I am a resident of the Bend of Islands and a member of the Bend of Islands Conservation Association (BICA). Whilst I very strongly support the Council's initiative in preparing a BMS, I consider that it is critical that the following issues are incorporated into the Strategy. • The current Draft Strategy refers to the 'environment' but does not define its 'value', including its 'economic value'. It is this environment that sets Nillumbik apart. Its why most of us live here and we have to be so careful that we don't destroy the very qualities that make it so special. • The tone of the current Draft is on an 'either-or' basis for Fire Safety verses Environmental Preservation. This is not necessarily the case. Mitigation strategies can be developed to enhance the quality and biodiversity of the environment. This needs to be reflected in the 1st two Strategic priorities as follows: - • 1 - Reduce the number and impact of bushfire incidents Improving bushfire mitigation across the municipality through improved prevention, planning and preparedness, whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress. • 2 - Creating a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity. The precautionary principal must be applied to all decisions and actions. In further refining and implementing the Strategy it is important to adopt a mindset that: - • Changes from an attitude that vegetation is solely something that burns and is a threat and to one that helps us understand trees and vegetation are integral components of our ecosystem and critical to many aspects of our lives. • Our declining Biodiversity must also be duly recognised with regard to best practice fire management. The State of the Environment Report for Victoria 2018 highlights that Victoria's biodiversity is rapidly deteriorating and the Strategy needs to address this. • Need for more community education • Need Strategic policy to address "new" residents to the area. I request that Council considers these issues and revises the Draft Strategy to included appropriate emphasis on the value of the environment and its biodiversity in the areas of natural environment within the Green Wedge.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

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Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Support

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Monday, 27 May 2019 5:39:20 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Yes

Do you have any comments about any of the strategic priorities?

As a lifelong rural resident and having lived through Black Saturday, I appreciate any effort on council's behalf to help reduce the severity and impact of bushfires on our rural communities and in the shire generally.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Yes

Do you have any comments about any of these operating principles?

The operating principles are spot on and it is encouraging that council finally puts primacy of human life as No.1 over all else.

Balancing environmental protection is not at odds with Principle No. 1 as the actions needed to achieve protection of human life will actually preserve the environment by helping prevent catastrophic fires from wiping out all flora and fauna too as we experienced on Black Saturday throughout Kinglake and more recently in Bunyip State Park.

Many of our residential roadsides are choked with fallen branches, dead understorey and dead saplings - residents should be permitted and encouraged to clean up their nature strips/roadside verges and perhaps there could be council working crews who assist where residents want to clean up a whole street or road.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

With respect 1.11 "Maintain, and conduct a needs analysis of Neighbourhood Safer Places (places of last resort) and consider the establishment of Community Fire Refuges"

Thought needs to be put into a safe refuge for residents wanting to evacuate large companion animals like horses or pet goats/sheep/alpacas etc to where it is safer than their own properties and there are some basic facilities (yarding, water, toilets).

Yarrambat Park comes to mind with the Pony Club Grounds and the lake area.

If residents have no-where safe to go, they will often decide to stay and look after animals when it is not safe to do so.

With respect 4.1 "Actively advocate to ensure legislation, policy and infrastructure investment meets the needs of the Nillumbik community"

Can there be a review of the (often mandatory) requirement for revegetation works with planning permits in the shire? Why should areas have to be planted if they were cleared land before. We need to place a value on a cleared pasture areas for bushfire safety!

What about the reintroduction of fire breaks where possible ie around the edges of reserves?

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

There is no recognition or statement regarding the importance of existing cleared grazing land / pasture in the shire which is critical for acting as fire breaks or defendable space for CFA fire crews and private landowners. This is critical for the protection of human life, large companion animals, livestock and built assets and to try and stop a fire from spreading.

I agree that the 10/30 and 10/50 Rules are not clearly understood (or even known of by some residents) and are hence underutilized by residents to help them manage vegetation around dwellings etc and along their boundary fencelines.

Community Fireguard Groups are an important contact point for residents in local neighbourhoods. I am part of an active group for the past 25 years and it has helped us get to know the neighbours in our local streets and to know what resources and practical knowledge people have for fire preparation. It is also good to know the houses in your street that might afford the greatest protection in the event of being trapped and forced to stay on a bad fire day. People are better off joining together and defending one very well prepared home if they find themselves trapped in their neighbourhood. The CFA need to better resource and support the CFG's - perhaps with a serious nudge from council.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

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Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Support

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This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Participate Nillumbik.

From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Monday, 27 May 2019 8:22:23 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Yes

Do you have any comments about any of the strategic priorities?

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Yes

Do you have any comments about any of these operating principles?

During the creation and implementation of community engagement and information mediums and sources for use by households and communities so they are able to make better decisions, I believe some inventive strategies will be required to penetrate the many households who currently do not attend their local community fireguard group, do not have a written plan and/or intend to "wait and see". Although there is currently a

proliferation of information available, these people are either not accessing it or implementing its recommendations. I think some kind of face to face contact is needed to get these households started with utilising information, making good decisions and writing a realistic plan.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

As a resident of the Bend of Islands I commend the council for their efforts with this Bushfire Mitigation Strategy. I notice that there is understandably a lot of emphasis on reducing, managing and modifying fuels, and I request that this be done in the context of protecting the native vegetation that makes the biodiversity of our unique Green Wedge such a special place for both humans and wildlife. In addition, after major fires there is a tendency for the community to target vegetation as the only cause of house loss. But because the bushfire risk to homes is also influenced by other factors such as: proximity to sheds, wooden fences and other flammable objects and structures; house design and level of ember egress prevention work undertaken and maintained; the preparedness of residents with a written plan, appropriate firefighting equipment, and training from a CFA facilitator in a community fireguard group; I would like to suggest that relevant agencies and council co-operate to include initiatives -- along with fuel reduction -- that proactively support residents to attend to these elements of bushfire mitigation.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

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Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 4:53:24 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

Re #2 - there needs to be a fundamental change in the attitude and behaviours of council staff and officers towards landowners who are the majority of the population in the green wedge part of the Shire. In particular, planning and environment departments need to be far less adversarial when dealing with all residents who are under annual threat by being in the natural path of bushfires in the northern part of the Shire. There is built up decades of distrust with Council and the approach of its officers and this needs to be addressed as a fundamental part of all community engagement. We want to be able to have co-operative interactions with council without the constant interference of a small number of very active people who either live outside of or in the green wedge and do not want to know or have no respect for what landowners can do for the environment. We are all called developers for just working on our properties and many seem to have easy access to some council officers to 'dob in a neighbour' when they don't like what they see.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Yes

Do you have any comments about any of these operating principles?

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

You will be recorded as part of the meeting proceedings when addressing the Committee and your name printed in the minutes. The audio recording of the meeting will be published on Council's website.

The personal information requested on this form is being collected by Council if you wish to speak to a committee item. This information will be used solely by Council for that primary, or directly related, purpose. The applicant understands that the personal information provided is if you wish to speak to a committee item and that they may apply to Council for access to and/or amendment of the information.

PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

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First name (Required)

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Organisation (If applicable)

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

Support

To view all of this form's submissions, visit

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 3:28:21 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Yes

Do you have any comments about any of the strategic priorities?

See PALs submission emailed separately.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Yes

Do you have any comments about any of these operating principles?

Subject to separate PALs submission emailed.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

See separate PALs submission

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

See separate PALs submission

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

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First name (Required)

max

Organisation (If applicable)

PALs

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

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Speaker's name (Required)

Speaker's phone number (Required)

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Nilumbik Pro Active Landowners (PALS)

**SUBMISSION TO
DRAFT BUSHFIRE MITIGATION STRATEGY
2019-2023 ("DBMS")**

Nilumbik Shire Council

28 May, 2019

**NILLUMBIK SHIRE COUNCIL (“NSC”)
DRAFT BUSHFIRE MITIGATION STRATEGY 2019-2023 (“DBMS”)
28 May 2019**

INTRODUCTION

Nillumbik Pro Active Landowners (“PALs”) is a group of approximately 2,000 landowners, residents and ratepayers, the majority of which live in the peri urban and rural parts of the Nillumbik Shire. It was formed in early 2016 in response to unpopular proposed local planning scheme amendments C81 (Significant Landscape Overlays) and C101 (Environmental Significance Overlays). As a result of PALS legal (and electoral) actions, (which influenced eventual composition of the current NSC Councillor corps), the amendments did not make it into law. The group has since been tasked with representing its constituents on a range of issues considered of vital importance to their lives, families, properties and interests.

This responsibility drives the reason that this introduction includes a restatement of a substantial section of the introduction to the submission made by PALs in response to the 2018 NSC DBMS dated 12 September 2018.

Given the landscape and environment character of Nillumbik includes the most heavily populated, highly vegetated, fire prone zones on Earth, the latest NSC **DBMS** which has now been released in early 2019 is considered by PALS to be one of the most critical undertakings by NSC for current and future generations. The very fact that the 2018 draft has been closely followed by the draft which is the subject of this submission, recognises the appreciation by the current NSC of this characterisation and its prioritisation of this undertaking.

Properties in Nillumbik include a rich combination of existing farms and open landscapes, lifestyle properties, bushland and interface hobby farms on the fringe of suburban Melbourne and all contained within a unique rural landscape. The Green Wedge covers 91% of the Nillumbik Shire and in excess of 79% of the land within the Green Wedge is privately owned. This positions landowners at the forefront of any strategy that directly impacts their landscape, safety, property rights and infrastructure.

PALS have actively contributed to the focus on the vital issue of bushfire risk by making significant contributions to local and State Government initiatives including valuable input into the **Fire Season Preparedness Inquiry 2017** which resulted in the report which is to be found here:

https://www.parliament.vic.gov.au/images/stories/committees/SCEP/Fire_Season_Preparedness/Report/EPC_58-11_Text_WEB.pdf

In particular attention should be drawn to section **4.2.3 at page 84ff** which specifically references Nillumbik and PALS contributions and position, together with the Committee’s appraisal of PALS information.

PALS asserts that our rural and peri urban landowners having proprietorship and custodianship of land approximating 90% of the footprint of the Shire, with extensive landowner experience in and exposure to bushfire risk and reality, are ideally positioned to provide NSC with its counsel and input in relation to this subject. PALS input and views are essential to ensure that an appropriate strategy is developed and adopted by the Nillumbik Shire Council.



EXECUTIVE SUMMARY

PALs support the DBMS as a well formulated document that addresses matters crucial to a comprehensive fire mitigation strategy. The 2019 DBMS greatly improves on the 2018 draft. This DBMS bears the clear hallmarks of the involvement and vast experience provided by Craig Lapsley into this vital strategy, for whose engagement NSC is congratulated and thanked.

Subject to PALs submission input detailed below, the DBMS provides a strong strategic direction for a robust bushfire mitigation strategy.

Any strategy is only as good as its implementation. Unless the final Bushfire Mitigation Strategy (BMS) ensures and guarantees successful, targeted and reportable implementation, it will fail the task of delivering genuine and lasting improvement in land management and community safety.

Any implementation of the BMS must be appropriately designed and controlled by a properly resourced and well constituted Implementation Committee. The composition of this Committee is critical to both its short term goals and long term achievements.

NSC must confirm and fully support the proposition that fire mitigation, together with all of the associated and related tasks, is a primarily a **fire, community safety and welfare issue, not a planning issue nor an environmental issue**. This properly calls for the Implementation Committee to be comprised of experts in the field of fire mitigation, suppression and related administrative considerations, not planners nor environmental officers.

Fire is the single most important natural and human impacting event Shire-wide and fire mitigation demands the highest priority of attention by our local government in a legitimate and collaborative partnership with local landowners and residents.

DETAILED ASSESSMENT

The DBMS appropriately recognises that responsibilities should be broadly shared across all relevant Agencies, NSC and, most importantly (given the percentage of private land within the Green Wedge), Landowners.

The DBMS also highlights the importance of a solid and productive partnership *“as it is imperative that Council and agencies work collaboratively with landowners to reduce fire risk.”*

“Liveability within a bushfire-prone landscape can only be achieved by acknowledging and managing the risk and impacts. Bushfire mitigation is a shared responsibility and will only work if all stakeholders foster strong partnerships with all involved. A community-centric model is needed, which relies on a connected community characterised by mutually respectful relationships, active partnerships, strong leadership and knowledge that guides improved decision-making.”

Given the historical erosion of landowner/NSC trust and collaboration, one of the foundation aims of PALS was to facilitate and negotiate a transformation in those relationships. It is an essential validation of PALS presence and advocacy to witness NSC acknowledge the importance of strong, mutually respectful, partnerships.

Key components of these critical partnerships, which are a prerequisite for effective fire sensitive land management in Nillumbik include:

- a community wide psychological and cultural rejection of and move away from the “dob in your neighbour” attitude which has persisted in Nillumbik as a defacto landowner control by environmental and council operatives. No effective and enduring partnership can tolerate or thrive in that atmosphere of inherent mistrust.
- removal of the spectre of sanction for responsible land management activities, which has been characterised by enforcement and harassment by previous councils

This will require a fundamental change of attitudes and behaviours (which have been prevalent for generations in Nillumbik) by:

- Council Officers and Administration – throughout the council but particularly in the departments of planning, environment and finance
- Landowners – who are in the process of establishing real trust in council which can only take root as the above factors are genuinely addressed.

The DBMS provides statistics in relation to satisfaction with and importance of fire mitigation and emergency services within the Shire. It is somewhat misleading or unhelpful to rely on use of these figures as they were Shire-wide. The fact that 87% of the population live within the Urban Growth Boundary and are so are not part of the Green Wedge was not appropriately considered. The effect on the survey results would be to slant responses to the suburban majority. If an exclusively rural survey was undertaken PALS is highly confident



that a very significant majority would not yet be satisfied with the council's current mitigation measures, while appreciative of the headway made to date. It would no doubt identify fire related issues as the number 1 priority across the Green Wedge.

This explains how welcome the current review and adoption of a revised *Bushfire Mitigation Strategy* is across the rural and semi-rural communities which comprise PALs wide constituency.

ROLE OF NILLUMBIK SHIRE COUNCIL

The DBMS identifies a number of NSC's legislated obligations "to help mitigate the social, economic and environmental impacts of bushfire in Nillumbik".

PALs insists a key imperative is that the final BMS also fulfil its further obligations to landowners by establishing the statutory, moral and supportive operational framework to empower landowners to work both independently and confidently with relevant agencies (or with their considered direction and support) to foster and deliver an environment and landscape that minimises the risk of major fire events traversing it (and possibly reaching into the south east and southern suburbs of the greater metropolitan areas of Melbourne) without restrictive controls and requirements for planning or environmental permits.

The macro detail of the above could be established within the implementation framework but these principles must be unambiguously established in the final DBMS and BMS documents.

CHALLENGES IN NILLUMBIK

Under the heading "The Community" PALs suggests further detail should be provided as follows:

THE COMMUNITY

Landowner considerations

Current planning controls provide no "as of right" provisions to rebuild following loss of buildings and/or infrastructure. This directly influences and impacts landowners' decision-making election of "leave early" or "stay and defend" options if fire events threaten their property.

Given the inherent uncertainty about the ability to rebuild, landowners are more likely to stay and defend irrespective of fire plans or direct fire threat. This disconnected and often perilous decision may cause loss of life which is attributable to arbitrary planning scheme restrictions.

Landowners and even emergency services (CFA) have long been and are still subject to penalty via enforcement action by council, (or, compelled into lengthy, expensive, bureaucratic controls via planning permit process) for fire mitigation works not directly affecting buildings and/or infrastructure.



Landowners openly acknowledge their responsibilities to “*minimise risk to their own property and surrounding properties*”, however a full 3 years post the despatch of proposed NSC planning scheme amendments C81 and C101, they remain hamstrung by planning permit controls that force planning permit applications across any part of their property outside the current 10-30/50 exemptions applicable to dwellings and the immediate areas around dwellings.

PALs restates its advocacy for the fundamental review of the 10-30/50 provisions which are entirely inadequate for effective and safe fire mitigation works in Nillumbik’s unique situation.

Planning Implications

Currently any fire mitigation works on private property (or roadside maintenance/mitigation works) require a planning permit from council. This requirement triggers a lengthy and very expensive process with, historically, little prospect of success. In previous seasons during which scores of roadside work programs (including cool burns) were planned, any effectiveness was thwarted by failure of permit delivery.

Fire mitigation consideration has historically appeared to sit uncomfortably below planning permit and environmental considerations, entirely inappropriate and unacceptable prioritisation for the Nillumbik region which is recognised as “*the most heavily populated, highly vegetated, fire prone area in the World*”.¹

Fire mitigation should be the highest priority in relation to the accepted Victorian Government position of the primacy of human life (per the 2009 Bushfire Royal Commission) followed by preservation of the landscape.

PALs submit that the final BMS should trigger planning scheme amendments to:

1. Remove the need to obtain a planning permit to undertake ground fuel reduction works on private property with advice of local CFA brigades and/or other fire agencies.
2. Require owners (public or private) to reduce ground fuel levels to a specified level expressed in tons/hectare as determined by suitably qualified fire experts, or to obtain a specific exemption for areas of special significance.

1 https://www.parliament.vic.gov.au/images/S1426-Nillumbik_Pro-Active_Landowners_PALs.pdf
PALs submission to the Victorian Legislative Council Select Committee Inquiry into the restructuring of Victoria’s fire services as contemplated by the Firefighters’ Presumptive Rights Compensation and Fire Services Legislation Amendment (Reform) Bill 2017 – p6



STRATEGIC PRIORITIES

PALs support the four strategic priorities set out in the DBMS. These are all important goals.

PALs advocate for three additional priorities to be added to this list.

- **Establish and maintain a viable and productive Implementation Group to actively monitor, adjust and action the Implementation Plan with reportable target assessments.**
- **Establish relevant planning and statutory frameworks to remove planning permit requirements, penalty regimes and enforcement actions against landowners undertaking genuine fire mitigation works consistent with the BMS.**
- **Implement a work program to create meaningful and practical buffer zones along the interface between existing public land, including Reserves and State Parks, and adjoining private property.**

OPERATING PRINCIPLES

PALs support the principles and strategic priorities as set out in the DBMS.

Whilst the *"holistic approach"* is indeed required, supporting the underlying principle of working from the whole to the part, it is equally important that a unique and very specific approach be initiated between council and private landowners. This is justified by the high percentage of private land ownership within the green wedge and rural lands generally. Nillumbik is a special and particular Shire – and this should be urgently recognised before another major bushfire event threatens it and the immediate environs.

Without the support and compliance of landowners, no fire mitigation strategy will work. Landowners should be considered and engaged as genuine principal partners in this critical strategy (not misleadingly labelled "developers", a mischievous tag of the few vocal but unrepresentative environmentalists – from Nillumbik and suburban Melbourne), given the serious responsibility and demonstrable land management credentials of Nillumbik landowners.

Priority should be placed on fire mitigation and reduction of ground fuel loads with the appropriate support through the planning scheme well beyond the current BMO requirements and deep within the basic current zoning of the RCZ. Currently there is no specific sections within the Nillumbik Planning Scheme that deal with appropriate ground fuel loads across the broader RCZ lands and any maximum limits that should be specified on both private and public land.

A robust and meaningful BMS must address these responsibilities and empower landowners to undertake works relevant to fire and fuel reduction across their landscape holdings.

OBJECTIVES

PALs strongly support the objectives and strategic priorities in relation to the *Bushfire Mitigation Implementation Plan*.

1. Reduce the number and impact of bushfire incidents

PALs suggest an additional item:

- 1.12** Conduct an ongoing ground fuel reduction program on all roadsides within the rural, semi-rural and peri-urban areas of Nillumbik for the express purpose of facilitating safe ingress and egress, as approved by the relevant local CFA brigade.
- # There are many local roads that the CFA **will not** access during a fire event due to overgrowth and overhanging vegetation. This unacceptable situation compromises both the safety and efficiency of CFA brigades as well as the ability of residents to evacuate if required.
 - ## **Local CFA brigades have abandoned applying for planning permits from council as they have been continually refused on the spurious grounds of "potential adverse environmental impact". This is not acceptable.**

2. Creating a community focussed approach to bushfire

- 2.2 includes references to *"Establish an annual local bushfire mitigation program to reduce vegetation on private property".... "and promotion of the 10/30 and 10/50 provisions"...*

PALs submit that whilst this is a very important component of a successful and robust Implementation Plan, reference should be made to the broader landscape on private property which lies outside the exemptions for 10-30-50 rules in relation to dwelling protection. PALs advocates for the fundamental review given the unsuitability of 10-30/50 in many Nillumbik semi rural, rural and peri-urban areas.

It is imperative to instigate, update and continually monitor a more general ground fuel reduction program working in conjunction with landowners.

PALs also suggest:

- 2.10** Engage suitably qualified consultants to calculate ground fuel loads across private and public lands for assessment and comparison to preferred or acceptable ground fuel levels. Provide framework for Implementation Group to make direct contact with relevant landowners to assist and encourage appropriate ground fuel reduction works.

EMERGENCY MANAGEMENT – Future Directions Plan (FDP)

PALs strongly support all of the *Future Directions Plan* as an important generalised document to inform and provide input to the *Bushfire Mitigation Strategy* and the revised *Green Wedge Management Plan*.

PALs strongly support all eleven recommendations within the FDP. Particularly recommendations 2, 3, 8 and 11 should be attributed high importance and should form the base of a robust, flexible and responsive *Bushfire Mitigation Strategy*.

CONCLUSION

PALs congratulate NSC for the professional, well conducted review of the DBMS that promises to make very positive contributions to the safety of the broader community as well as, in particular, the rural and semi-rural communities living in the landscape within the Green Wedge.

Whilst there is ultimately no real protection from negligence, it is more likely that if, in the catastrophic event of another major fire event across the landscape, the council has in place a robust, working and responsive initiative and action plan, there is less possibility that the council could be accused of neglect and of contributing to the magnitude of such an event.

A revitalised *Bushfire Mitigation Strategy* further contributes to the deserved public perception that this Council is properly fulfilling its obligations and fiduciary protection of its ratepayers and residents.

Nillumbik PALs restates and emphasises that this submission carries the legitimate imprimatur of the vast majority of landowners in the Nillumbik Shire, who effectively are custodians of and are responsible for the management of the bulk of the footprint of the Shire. PALs views should be attributed an appropriately prevalent degree of influence in the settling of any final BMS.

PALs commends this response submission to the NSC and its BMS team.

Damian Crock
Chair
Working Group
Nillumbik PALS

28 May 2019

Green Wedge Protection Group wish to make the following comments and suggested document alterations, in response to the updated Draft Bushfire Mitigation Strategy:

Page 3. Definitions:

Bushfire Protection Exemptions (“10/30 and 10/50 rules”): This should elaborate on the actual extent of vegetation allowed to be removed along WHICH fencelines - this provision allow clearing up to **a combined 4m width** along existing **PERIMETER** fencelines built prior to 2009, not existing internal fencelines. Fencelines constructed AFTER 2009 need to comply with vegetation clearing regulations.

P.4 Executive Summary

“There are unique challenges within Nillumbik Shire that make bushfire mitigation particularly complex.”

We don’t believe we have anything particularly unique. As stated further on in the document, neighbouring shires have exactly the same problems. While each shire is different in structure, community, etc, the actual issue of fire mitigation and community concerns are NOT unique. Wording should be: “There are challenges within Nillumbik shire that make fire mitigation particularly complex.”

P.5 INTRODUCTION 3rd para, 2nd last line

“The people of Nillumbik generally understand the risk and threat of bushfire, and FEAR what it can do to their lives etc”. The word “fear” is an emotive word and is out of place in a document such as this. The GWPG believe that the word “respect” would be far more appropriate, or “may be anxious with regard to what bushfire can do to their lives, etc”.

Nillumbik Shire – Profile and partnerships (Page 6. 3rd Paragraph):

The entire 3rd paragraph is not accurate. The word “zone” should be removed in the first sentence, reading as follows: “The majority of the shire (91 per cent) is known as the ‘Green Wedge’, which is home to approximately 13,000 people etc”.

Second sentence, doesn’t make sense – instead, should say “Majority of the land within the ‘Green Wedge’ is zoned Rural Conservation. The majority of the remaining land is zoned Green Wedge Zone A.

The third sentence is not correct - “Planning restrictions in these zones restrict and limit what owners can do on their land to reduce fire risk”. The BMO overrides all planning controls that may prevent landholder undertaking vegetation removal works to provide defensible space. There is now adequate provision for this, therefore planning controls are NOT a restriction in any sense. If landholders believe that the exemptions under the BMO are not enough, there is adequate provision for the landholder to undertake a Bushfire Risk Assessment on their property to justify any perceived need for increased vegetation removal outside the allowable 10/50 exemptions, and the landholders can then apply for a permit to undertake any additional works, if required. It’s important to note

that many circumstances may result in a defensible space that is calculated as LESS than the allowable 50m.

Historical management of bushfires:

While we can learn a lot from all this historical information regarding 'Firestick burning', we need to be mindful that weather patterns have changed substantially since those times – due to climate change – which is not only affecting the severity of the fires, but also the resilience of the bush/native species to cope/survive a fire event (or the altered climatic conditions). We have to acknowledge that the environmental impacts of introduced species and out-of-balance native fauna (kangaroos) will undoubtedly have impacts, in this modern day, on the integrity of the bush and the impact the bush' ability to regenerate following these fuel modification burns – impacts that are unlikely to have been present when the lands were historically burned by the resident aboriginal people.

When considering vegetation management to mitigate bushfire risks, we first need to remove woody weeds and elevated heavy exotic grass loads as first priority, as these are often the greatest contributors to fire travel and intensity particularly along roadsides.

Challenges within the Shire

Again, stating that "A UNIQUE set of social, economic, environmental and technological challenges within Nillumbik make bushfire mitigation particularly complex" may not be the case – other municipalities on the urban fringe are likely to share many of the complexities that Nillumbik face.

(Page 9-10) The Community:

Community concerns about bushfire – the term "Fear" is too emotive – recommend using "anxiety", which may be more accurate and less emotive

An added complication with regard to community communication is that the local CFA's are not allowed to have email addresses of people in fireguard groups, making direct communication difficult.

(Page 10) The Environment:

A major driving force that influences climate change has been broad scale vegetation removal – the community, including those that are anxious regarding the risk of bushfire, must be made aware that vegetation clearing may come with increased consequences with regard to exacerbating climate change, creating a Catch 22 situation.

There must be recognition that many people within Nillumbik live on bushland properties and thus there must also be recognition of the need to educate these people on how best to manage their properties that also allows for fire mitigation.

Methodologies must be devised that allow landholders to undertake fire mitigation and still preserve biodiversity, thus generally maintaining integrity of the bush and habitat values.

Community focussed approach to bushfire:

Strategic Priority Point 2 (P.13)

Need to acknowledge that education is the prime tool to affect or motivate change.

Must acknowledge the value of high quality roadside vegetation.

Objectives

Page 14. Strategic Priority 1, Goal 1.2 – encourage the placement of electric lines underground, using open-trenching in areas of low biodiversity value, and using line-jacking technologies in areas of high biodiversity. In the longer term, this will reduce fire risks due to downed electrical lines while also improving amenity.

EMERGENCY MANAGEMENT FUTURE DIRECTIONS PLAN APPENDIX 1

4th paragraph 5th page of the Directions Plan: “91% of Nillumbik is within the Green Wedge ZONE...”
Remove “zone” – instead say “91% of Nillumbik is designated Green Wedge”.

We take umbridge to “on the flip side, stringent planning controls LEAD TO HEIGHTENED BUSHFIRE RISK etc etc...one road in, one road out of townships...” Planning controls do not increase fire risk – there is ample provision in the exemptions to allow for providing safe access and egress, and personal protection, etc etc

P.7 Challenges and considerations:

dot point 9: “Decreased planned burning of forest – due to environmental policy, climate and weather patterns” – we agree with this being due to climate and weather patterns but we are unaware of any environmental policy that prevents planned burning.

Emergency Management and Bushfire Policy – State Emergency Management Priorities:

We fully support recommendation 2.6 – establish leadership group yadda yadda – and wait with baited breath to see their 3 community members.

Attachment B: P. 46 Action Plan Matrix:

Form a roadside management working group – we strongly support the formation of this group, and it must have an environmental person who understands fire behaviour and the affects of fire on the vegetation communities.

Ensure that there is some sort of monitoring of the feed being brought into the shire to avoid introduction of fuel-loading grasses such as Chilean Needlegrass etc.

Introduction

The Green Wedge Protection Group (GWPG) was formally incorporated in 1995, following municipal amalgamations. Less formally, the Group has existed since the early 1970s. The Purposes of the Green Wedge Protection Group include:-

- Working to ensure that residents and public officials of the Shire of Nillumbik act together to protect the environment; develop a high quality urban lifestyle within limited designated areas; and promote a rural lifestyle with sensitive farming and enhanced conservation objectives.
- Ensuring the Green Wedge is the strategic focus of the Shire of Nillumbik.
- Providing input to the Shire of Nillumbik and other decision making bodies on any matter considered relevant to the Green Wedge.

The Green Wedge Protection Group is heavily involved in state and local planning issues, both currently and prior to the group's formal inception, and will continue to provide advice and direction to authorities to ensure the intent of our Green Wedges is upheld at all levels of Government, and the values protected.

VEC Final Report: Electoral Representation Review for the Nillumbik Shire Council (19 May 2008)

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The entire 3rd paragraph is not accurate. The word “zone” should be removed in the first sentence, reading as follows: “The majority of the shire (91 per cent) is known as the ‘Green Wedge’, which is home to approximately 13,000 people etc”.

Second sentence, doesn’t make sense – instead, should say “Majority of the land within the ‘Green Wedge’ is zoned Rural Conservation. The majority of the remaining land is zoned Green Wedge Zone A.

The third sentence is not correct - “Planning restrictions in these zones restrict and limit what owners can do on their land to reduce fire risk”. The BMO overrides all planning controls that may prevent landholder undertaking vegetation removal works to provide defendable space. There is now adequate provision for this, therefore planning controls are NOT a restriction in any sense. If landholders believe that the exemptions under the BMO are not enough, there is adequate provision for the landholder to undertake a Bushfire Risk Assessment on their property to justify any perceived need for increased vegetation removal outside the allowable 10/50 exemptions, and the landholders can then apply for a permit to undertake any additional works, if required. It’s important to note that many circumstances may result in a defendable space that is calculated as LESS than the allowable 50m.

Historical management of bushfires:

While we can learn a lot from all this historical information regarding ‘Firestick burning’, we need to be mindful that weather patterns have changed substantially since those times – due to climate change – which is not only affecting the severity of the fires, but also the resilience of the bush/native species to cope/survive a fire event (or the altered climatic conditions). We have to acknowledge that the environmental impacts of introduced species and out-of-balance native fauna (kangaroos) will undoubtedly have impacts, in this modern day, on the integrity of the bush and the impact the bush’ ability to regenerate following these fuel modification burns – impacts that are unlikely to have been present when the lands were historically burned by the resident aboriginal people.

When considering vegetation management to mitigate bushfire risks, we first need to remove woody weeds and elevated heavy exotic grass loads as first priority, as these are often the greatest contributors to fire travel and intensity particularly along roadsides.

Challenges within the Shire

Again, stating that “A UNIQUE set of social, economic, environmental and technological challenges within Nillumbik make bushfire mitigation particularly complex” may not be the case – other municipalities on the urban fringe are likely to share many of the complexities that Nillumbik face.

(Page 9-10) The Community:

Community concerns about bushfire – the term “Fear” is too emotive – recommend using “anxiety”, which may be more accurate and less emotive

An added complication with regard to community communication is that the local CFA’s are not allowed to have email addresses of people in fireguard groups, making direct communication difficult.

(Page 10) The Environment:

A major driving force that influences climate change has been broad scale vegetation removal – the community, including those that are anxious regarding the risk of bushfire, must be made aware that vegetation clearing may come with increased consequences with regard to exacerbating climate change, creating a Catch 22 situation.

There must be recognition that many people within Nillumbik live on bushland properties and thus there must also be recognition of the need to educate these people on how best to manage their properties that also allows for fire mitigation.

Methodologies must be devised that allow landholders to undertake fire mitigation and still preserve biodiversity, thus generally maintaining integrity of the bush and habitat values.

Community focussed approach to bushfire:

Strategic Priority Point 2 (P.13)

Need to acknowledge that education is the prime tool to affect or motivate change.

Must acknowledge the value of high quality roadside vegetation.

Objectives

Page 14. Strategic Priority 1, Goal 1.2 – encourage the placement of electric lines underground, using open-trenching in areas of low biodiversity value, and using line-jacking technologies in areas of high biodiversity. In the longer term, this will reduce fire risks due to downed electrical lines while also improving amenity.

EMERGENCY MANAGEMENT FUTURE DIRECTIONS PLAN APPENDIX 1

4th paragraph 5th page of the Directions Plan: “91% of Nillumbik is within the Green Wedge ZONE...” Remove “zone” – instead say “91% of Nillumbik is designated Green Wedge”.

We take umbrage to “on the flip side, stringent planning controls LEAD TO HEIGHTENED BUSHFIRE RISK etc etc...one road in, one road out of townships...” Planning controls do not increase fire risk – there is ample provision in the exemptions to allow for providing safe access and egress, and personal protection, etc etc

P.7 Challenges and considerations:

dot point 9: “Decreased planned burning of forest – due to environmental policy, climate and weather patterns” – we agree with this being due to climate and weather patterns but we are unaware of any environmental policy that prevents planned burning.

Emergency Management and Bushfire Policy – State Emergency Management Priorities:

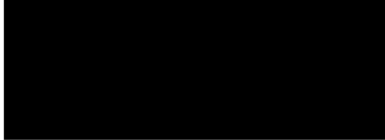
We fully support recommendation 2.6 – establish leadership group yadda yadda – and wait with baited breath to see their 3 community members.

Attachment B: P. 46 Action Plan Matrix:

Form a roadside management working group – we strongly support the formation of this group, and it must have an environmental person who understands fire behaviour and the affects of fire on the vegetation communities.

Ensure that there is some sort of monitoring of the feed being brought into the shire to avoid introduction of fuel-loading grasses such as Chilean Needlegrass etc.

The Green Wedge Protection Group thank you for the opportunity to contribute to this survey process.



Kahn Franke, President, Green Wedge Protection Group

From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 3:24:33 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Yes

Do you have any comments about any of the strategic priorities?

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

Priority 2 could be re-framed to achieve transformative change in attitudes towards incorporating strategies aimed at reducing the speed of climate change into planning and strategic docs. This doc and others (eg "Protecting Melbourne's Strategic Agricultural Land" focus on the impacts, but not on considering positive actions within the scope of the project to help address climate change. . Suggestion:

Council will work to strike a balance between working to reduce the threat of bushfire and the impact on private property and businesses, protecting the environment, including the shire's unique flora and fauna and identifying/implementing strategies which will impact positively on climate change.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

1.3 add: "... program, implementing strategies which reduce the impact of climate change.

If a focus on reducing the impact on climate change is included in the Operating principles, it will flow through to the implementation of all of the objectives

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

See Nillumbik Greens' submission for further details

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

Yes

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Russell

First name (Required)

Betty

Organisation (If applicable)

Nillumbik Greens

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

[REDACTED]

Select whether you support or object to the matter. (Required)

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Submission (2) re draft Bushfire Mitigation Strategy 2019

From Nillumbik Greens

Contact Details: Betty Russell

Date: 28th May 2019

Thank you for the opportunity to make this community submission, the briefing for Nillumbik Greens and the drop-in sessions with very helpful mapping displayed.

Nillumbik Greens would like to propose some additions/ modifications in relation to the following:

1. **Climate Change impact needs positive climate change bushfire mitigation strats**
2. **Biodiversity protection needs to be built into BMS**
3. **Bushfire mitigation strategies to enhance biodiversity & impact positively on climate change**
4. **Extreme Weather Events**
5. **Community Ownership of responsibility of implementation**
- 6 **Other**

NOTE: Suggested changes or modifications are printed in purple

1. **CLIMATE CHANGE: impact necessitates positive climate change bms**

In the draft BMS and in the "Emergency Services Future Directions Plan", Climate change is framed only in terms of its impact, but because of its impact, reducing the speed of climate change needs to be recognized as a wider strategy for bushfire mitigation.

Adapting commonly used strategies through the prism of impacting positively on biodiversity and climate change presents a different frame for the BMS and provides an important challenge (developed further under #3 below), with implications for resourcing, educating and lobbying for funding. **This re-framing is important to achieving transformative change in the way people view bushfire preparation.**

Draft BMS, p.10

Challenges	
The Environment	
Climate Change	*The effects of climate change will increase the intensity and frequency of bush fires *Fire mitigation strategies which impact positively on climate change need to be identified, evaluated and implemented

Emergency Services Future Directions Plan

Beneath the bullet point "more frequent, more intense weather events ..." [p.7], add another bullet point:

- **Developing all strategies and plans through the prism of mitigating the impact of climate change.**

2. PROTECTING BIODIVERSITY

Climate change and loss of biodiversity are the major global environmental issues, according to a recent report by the *Intergovernmental Science-Policy Platform on Biodiversity & Ecosystem Services*. This is relevant also closer to home, as revealed in the Victorian Government Report on the "State of the Environment 2018", which notes that Victoria's biodiversity has seriously decreased over the past two centuries. It also notes that a key challenge around land use is making sure farms can keep operating while protecting and enhancing biodiversity and land health.

The Draft BMS recognizes the importance of protecting biodiversity:

- the high value which the Nillumbik community places on biodiversity [p.10]
- the challenge of meeting fuel load reduction targets while ensuring the region's biodiversity remains intact [p.10]

Similarly "Emergency Services Future Directions Plan" includes

- as a challenge and consideration, "the need to better understand and manage biodiversity and environmental issues ..." [p.7]
- as an objective for bushfire management on public land: "Maintain or improve (my emphasis) the resilience of natural ecosystems and their ability to deliver services such as biodiversity, ..." [p. 9]

This document (the ESFDP) also recognizes biodiversity as an environmental and conservation asset [p. 9]

The importance of protecting our environment is reflected in a range of other council documents: *Council Plan 2017-21* [Strategic Objective 3], *Climate Change Action Plan 2016-20* [p.10], the *Green Wedge Management Review Community Panel Recommendations* (17 November 2018) and the *Nillumbik Early Years Sustainable Strategy Statement* (published 17 Dec 2018).

The Draft BMS & the ESFDP recognize the importance of protecting the environment and biodiversity; therefore bushfire mitigation needs to embrace strategies which enhance the biodiversity at the same time as preparing for bushfires. Transformative change is needed in the way people think about bushfire preparation.

3. BMS WHICH IMPACT POSITIVELY ON CLIMATE CHANGE & BIODIVERSITY

The BMS identifies the fundamental principle of "Balancing environmental protection with bushfire risk", p.13. This principle flows through to the Environmental challenges, p.10 and the community education needs include "Developing & implementing 'environmental' education tools", 2.5, p.15. Similarly, the "Emergency Management Future Directions Plan" under "Challenges & Considerations", p.7, identifies "the need to better understand and manage biodiversity and environmental issues including smoke, water and health"

Land clearance has the potential to damage eco-systems and add to the loss of biodiversity, thus exacerbating climate change, which increases the fire danger. Strategies commonly

used, such as land clearance and roadside slashing, need to be developed differently, so as to maintain and possibly enhance our ecosystems.

Land clearing for the purpose of mitigating bushfire danger (road-side clearing, clearing for defensible space 10/30 and 10/50 exemptions, burn-offs) results in the flourishing of woody weeds, introduced grasses for pasture and invasive vegetation such as blackberries, which flourish on cleared land and which generally have a greater fuel load than selected indigenous plants.

Replant slashed areas with native grasses (eg Poas and Kangaroo Grass) and other fire retardant low and medium storey indigenous plants [<http://www.anpsa.org.au/fire.html>]

- Only slash native grasses after they have seeded
- Trees block radiant heat; leave where possible
- Trees are part of an ecosystem; if they are cut and off-set by planting a tree somewhere else, they need to have community (understorey) planted with them
- Burn-offs should be according to the mosaic principle of cold burns, carefully controlled and supervised and should be rotated so that no area is burned too frequently.

The whole issue of land clearing as a fire protection strategy needs to be further evaluated. Many people appear to think that fire travels more slowly across cleared land, but the recent Lancefield and Barford/ Redesdale fires showed otherwise. Of consideration too, is that spot fires jump forward further/ faster with no barriers on cleared land. More studies are needed to ascertain differences in burning speed and radiant heat under comparable weather and terrain, between cleared spaces and spaces with native grasses and low to medium slow burning indigenous plants. Studies [cited in "Red Eagle Bushfire Protection Services"] focus on calculating radiant heat in a theoretical context of medium forest burning close to defensible space around a house; the CFA identifies that "the danger to the house is the vegetation type that the bushfire runs through."

Council needs to lobby for research to be undertaken analysing the relative speeds of fire progress across cleared land of non-native grasses, compared with indigenous grasses and low to medium indigenous vegetation, following any fires which cover both, taking terrain into account. In such cases the wind speeds, weather and other factors are more likely to be comparable. Also observations of fire-fighters need to be documented through a questionnaire to provide another angle to research.

Some areas are of much higher fire danger than others, due to their terrain, proximity to bushland, etc.

In areas of high fire risk, no further new developments should be allowed, as recommended by the Victorian Royal Commission into Bushfires.

4. EXTREME WEATHER EVENTS

"The stated aims of the inner and outer zones cannot be achieved in a severe bushfire."

It must be emphasized more strongly that no amount of preparation can make people safe from extreme weather events.

It needs to be at the beginning, introducing the executive summary, then woven throughout the document.

5. COMMUNITY OWNERSHIP of responsibility of implementation

There is a need for all stakeholders to play a part in the development and oversight of an Implementation Plan.

6. OTHER

Arson. We commend the BMS doc on its emphasis on the need to develop a preventative program on arson [Strategia Priority 1.1, p. 14}

Ageing: One suggestion relevant to the issue of an aging population is that a leaflet/info sheet be prepared listing all the relevant kinds of subsidized help available to older people (eg gutter cleaning). Such a leaflet should include eligibility requirements, cost and how to access the service and the print should not be too small for old eyes. It should be prepared in consultation with Nillumbik Health.

Planning:

CONCLUSION

Make Nillumbik's BMS an outstanding LG leader by producing a BMS which recognizes not only the impact of climate change, but also the need to address climate change through using bushfire mitigation strategies which protect and enhance indigenous biodiversity,

From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 4:44:20 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

See below

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

See below (modifications fo 1 and 2)

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

I am a resident landowner in the Bend of Islands and a member of the Bend of Islands Conservation Association (BICA). I strongly support Council's initiative in preparing a BMS but believe it is necessary, in addition, to give more specific recognition to environmental considerations

There can be no denying that 'the primacy of life must be paramount', and the BMS indeed gives full weight to that consideration, and I will not comment further on that value. However, the second 'operating principle' articulated in the document calls for 'balancing environmental protection with bushfire risk'. It is, in fact, the natural environment and its protection as set out in the Green Wedge policies that set Nillumbik apart from other council jurisdiction. It is the reason why many of us elect to live here, and we need to be careful that we don't destroy the very qualities that make it so special. In an extreme case, we could simply pave over the GW and reduce the bush fire risk to zero, not that anyone, I hope has proposed to do so!

We are not engaged in a zero-sum game, so common in our current political life, that sees one value as totally opposed to another. I believe mitigation strategies can be developed to enhance the quality and biodiversity of the environment. Such a common-senses approach could be articulated by amending the first two 'Strategic Priorities' to read as follows:

1. Reduce the number and impact of bushfire incidents Improving bushfire mitigation across the municipality through improved prevention, planning and preparedness, whilst ensuring all work protects native vegetation and regenerates biodiversity where it is under stress.
2. Creating a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity.

In general, in an age of increasingly serious climate change, we need to recognise the need preserve biodiversity as part of best practice fire management. The State of the Environment Report for Victoria 2018 highlights the fact that Victoria's biodiversity is rapidly deteriorating, but the BMS does not appear to acknowledge this. Related to appropriate fire management and biodiversity is the probability that indigenous management techniques will have something to offer. I realise that Council is already aware of some traditional strategies and has begun to experiment with them under the guidance of the Traditional Custodians, I hope some recognition of such practices can be include in the BMS.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

Yes

If you wish to speak at the FNC meeting on 11 June, you must complete the details below.

Each speaker is allowed three minutes to speak to an agenda item. They may also speak on behalf of one other person or organisation for a further period of up to three minutes. No person may speak on behalf of more than one other person or organisation.

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Fisher

First name (Required)

Tom

Organisation (If applicable)

Phone number (Required)

██████████

Email (Required)

████████████████████

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 3:39:20 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

There has been a submission of the form Draft Bushfire Mitigation Strategy - submission form through your Participate Nillumbik website.

STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Partially

Do you have any comments about any of the strategic priorities?

1. Reduce the number and impact of bushfire incidents. I agree that the impact of bushfire incidents may be reduced by careful fuel load reduction, but ultimately as stated in the draft report, Climate change will increase the intensity and frequency of bushfires. Therefore council's focus needs to be on reducing the impacts of Climate Change to effectively reduce the number of bushfires long term.

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

1. Reduce the number and impact of bushfire incidents "Support the enhancement of CFA's Community Fireguard program" will help with the "Treechange Movement" . I find this term a little prerogative used in relation to "These people are unlikely to understand bushfire risks and their obligations as landowners to reduce bushfire risks, nor have the skills or equipment to effectively prepare their property for bushfire". When I first moved to the shire I knew nothing about Bushfire Safety & now I am a a convener of a CFA Fireguard Group. I think education is the key here, to gain knowledge of bushfire behavior based on science, not emotion.

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

I am a resident of the Bend of Islands and a member of the Round the Bend Conservation Co-operative and the Bend of Islands Conservation Association (BICA). I strongly support the Council's initiative in preparing a BMS however I consider that it is particularly important that the following issues are incorporated into the Strategy. The tone of the current Draft is on an 'either-or' basis for Fire Safety verses Environmental Preservation. I feel this is too simplistic. Mitigation strategies can be developed to enhance the quality and biodiversity of the environment, which would help mitigate the risk that Climate Change. To reduce the number and impact of bushfire incidents by improving bushfire mitigation through improved prevention, planning and preparedness, we also need to ensure all Fuel reduction work protects native vegetation and regenerates biodiversity where it is under stress. We cannot underestimate the value of biodiversity in keeping us safe. I think it is important that we stop viewing vegetation solely as something that burns and is a threat, but come to understand trees and vegetation in terms of e.g. air, soils, water, micro-climates, shade, habitat, biodiversity, ecosystems. Noting that in some instances, native vegetation has the potential to reduce fire risk, especially when compared with weed infestations that can have a far greater biomass. Our declining Biodiversity must also be duly recognised with regard to best practice fire management. The State of the Environment Report for Victoria 2018 highlights that Victoria's biodiversity is rapidly deteriorating and the Strategy needs to address this. if we do not protect our habitat we will be increasing the risk of Climate Change, more frequent bushfires & thereby increasing our risk to bushfire, instead of minimising it.

Do you wish to speak to your submission at the Future Nillumbik Committee

(FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

No

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PLEASE NOTE: If you have applied to speak at FNC here, you **do not** need to apply on Council's website

Surname (Required)

Johnstone

First name (Required)

Lynne

Organisation (If applicable)

Phone number (Required)

[REDACTED]

Email (Required)

[REDACTED]

Are you nominating someone to speak on your behalf? (Required)

No

Speaker's name (Required)

Speaker's phone number (Required)

Select whether you support or object to the matter. (Required)

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From: no-reply@harvestdp.com
To: [emmatters](#)
Subject: Draft Bushfire Mitigation Strategy - submission form Form Submission
Date: Tuesday, 28 May 2019 4:16:22 PM

Draft Bushfire Mitigation Strategy - submission form Form Submission

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STRATEGIC PRIORITIES

Four strategic priorities will shape the Bushfire Mitigation Strategy.

QUESTION 1: Do you agree with the four strategic priorities?

Yes

Do you have any comments about any of the strategic priorities?

OPERATING PRINCIPLES

Four operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within Nillumbik Shire.

QUESTION 2: Do you agree with these four operating principles for risk management and bushfire mitigation

Partially

Do you have any comments about any of these operating principles?

Principle 1 - agree Principle 2 - bushfire-risk and environment protection shouldn't be seen as opposites. Environment management must have two aims: reduce fire risk and encourage biodiversity. Principle 3 - agree Principle 4 - we hope 'holistic' doesn't mean a 'one-size-fits-all' fuel reduction approach in all and every circumstance. i.e. environmentally sensitive areas with high biodiversity values will need a more careful

fuel reduction treatment. These areas were recently mapped for the ESO review; but Council seems to have refused recognition.

OBJECTIVES

Each of the four strategic priorities has been allocated high-level objectives (goals) that will guide the three-year Bushfire Mitigation Implementation Plan.

QUESTION 3: Do you have any comments about the any of the goals that have been allocated to each of the four strategic priorities?

Goal 1.3: 1.4: On roadsides and reserves fuel reduction should be designed to encourage native grass species (lower biomass) while targeting woody weeds and introduced grasses (higher biomass) Botanical knowledge must inform the fuel reduction program. Goal 1.5: Because of the loss of indigenous local knowledge, 'firestick' cool burning will be very challenging. It must be controlled by professionals with good biodiversity advice so that adverse impacts on flora/fauna and soil degradation is avoided. Records must be kept and observations recorded over the long term. Goal 1.7; 2.1; 2.2: The State 10/30 and 10/50 exemptions are questionable where they encourage ad-hoc tree removal without any well researched scientific justification. In 'Code Red' conditions, tree removal will make no difference; in moderate conditions, trees may slow wind speed, catch embers, help cool land and provide habitat and amenity. Goal 2.5: The extensive ESO review data undertaken under the previous council should be the basis of the education mentioned. Goal 4.1: Words need adding: i.e. "Actively advocate to ensure legislation, policy and infrastructure investment meets the needs of the Nillumbik community AND BIODIVERSITY PROTECTION."

Do you have any other comments on the Draft Bushfire Mitigation Strategy?

, As the Black Saturday Royal Commission recommended, the protection of human life can be best addressed at the 'settlement planning' stage. i.e. some BMO areas should be regarded as too dangerous, and dwelling approvals in these areas should be refused. Putting more people in harms way at the settlement planning stage is not in the community's long term best interest.

Do you wish to speak to your submission at the Future Nillumbik Committee (FNC) meeting on 11 June 2019 at 7.30pm, at the Civic Centre, Civic Drive, Greensborough.

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Surname (Required)

First name (Required)

Organisation (If applicable)

Phone number (Required)

Email (Required)

Are you nominating someone to speak on your behalf? (Required)

Speaker's name (Required)

Speaker's phone number (Required)

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Nillumbik Ratepayers Association Inc.

Submission to Draft Bushfire mitigation Strategy 2019-2023

May 2019

The closer your home is to the bush the more at risk you are. Over 110 years of deaths due to bushfires, a life lost database analysis found that,

dot point 3, . 85% happened within 100 metres of a forest.

Lapsley page 12.

We wish to address the Committee

We have argued over many years that Nillumbik is not an island, particularly when looking at the threat of bushfire.

This was most dramatically brought home to us on 9 February 2009, when a fire that started in Kilmore East swept through the northern part of the shire before the wind change took that fire to Kinglake.

What is a concern to us is that the two Reports by bushfire experts David Packham and Rod Incoll, presented to Nillumbik Shire Council in 2003, note: 6 years before Black Saturday, and were virtually ignored. Interestingly the Packham Report stated that the threat of fire to Nillumbik would most likely come from that area.

We ask that those two Reports, multiple copies of which have been presented to council over the years should be considered as part of this submission.

We are encouraged by the legislation that is to be fully implemented until December 2020, although that is still 18 months away and into the start of that fire season.

The legislation states:

“5 Objectives of Act

(c) implement and “all communities all emergencies” approach to emergency management; and

(d) establish integrated arrangements for emergency management planning in Victoria at a State level. “

also “12 Functions of Inspector – General
for Emergency Management

(gb) monitor, review and assess emergency management planning at a system level undertaken in accordance with part 6 A,”

This legislation rightly, in our opinion, takes the responsibility away from council and looks at fire mitigation at a regional level where it can be effectively addressed.

We presume that the “all communities all emergencies” includes all Public Landowners, including Parks Vic, Melbourne Water, Councils, State Parks ect. If These Public landowners are not included then this will be a large waste of time and money.

It is acknowledged that when it comes to bushfire threat, and other threats like weed invasion having public lands as neighbours is having 'the neighbours from hell'.

This is backed up by the statistics on page 12 of Mr Lapsleys Report, “a life lost data base analysis found that:

3.

85% happened within 100 meters of a forest”.

As few private landowners own forest one could argue that 'bushfire mitigation' works are desperately needed in and on publicly owned land, and that, in general, private landowners keep their properties in a reasonable 'fire safe' condition.

What is apparent is that legislation must be modified, or preferably removed that restricts private landowners from undertaking legitimate fire prevention works on their properties.

Whilst we agree in principle, to much if not most of the declarations intentions within these documents we do have concerns, such as in the 'operating principles' where you rightfully state No. 1 the protection of human life, but we have some concerns when as no. 2 you state 'Balancing environmental protection with bushfire risk----including the shire's unique flora and fauna. If you balance, environment with bushfire risk then you are weakening bushfire protection!

The uniqueness of Nillumbik's flora is that it is a part of the least threatened most abundant vegetation remaining in Victoria since European settlement, and as such our fauna has a similar abundance, whilst some species might be listed as 'vulnerable' none as far as we can find are endangered.

Also at no. 4. it is stated that bushfires have high intensity it will be unpredictable, difficult to control and will cause significant damage, cause death and destruction.

On a visit to the emergency centre at Kangaroo Ground following Black Saturday we were informed that staff there had 'predicted the path of the Kilmore East fire' and were accurate within 15 minutes. We say that fires generally act predictably. We also have difficulty with the term 'difficult to control', as was pointed out in the 2003 Report by Rod Incoll there comes a point, mainly due to fuel loads where fires are not 'difficult to control' but are actually uncontrollable, even with rotary wing and or jet aircraft.

Whilst we acknowledge that the stated priority is the primacy of human life, and rightly so, we note that in the Emergency Management Future direction Plans under:

'1. Emergency Management and Bushfire Policy Setting

1.2 State Emergency Management Priorities...

The priorities are:

1, Protection and preservation of life is paramount including:

- I. Safety of emergency services personal; and
- ii. Safety of community members.....

Most of what we read in these documents is about legislative requirements, and future requirements, which have nothing to do with actual bushfire mitigation.

We do note and accept the acknowledgement that 'fuel loads', mainly surface fuels have been mentioned as a major issue when attempting to mitigate bushfires.

It has been acknowledged by many experts including David Packham,. Rod Incoll, Dr Kevin Tolhurst and others that if 'fuel loads' were managed (at levels determined by experts) then most fires even on extreme days would be controllable, and therefore there would be less loss of life and property and less damage to the environment and infrastructure.

We find it disappointing to say the least that this current Victorian Government has decided to discontinue the VBRC recommendation of modifying fuels by 5% to 8% PA. with a minimum of 5% PA. of public lands.

We ask that you urge the Victorian Government to re-instate the above fuel management VBRC recommendation.

Brian Murray President

Submission to the Nillumbik Bushfire Management Plan
Sue McKinnon

Updated for the second round of consultation

Please reconsider the submission below that I sent last consultation period. I re-stress the following:

- smoke impacts need to be determined and fire used as a last resort for bushfire mitigation
- scientific evidence to be sought for effectiveness of fuel reduction burns and opening up ecosystems by removing bush – these actions dry out the area and remaining plants, making it prone to fires.
- Council must advocate for cessation of logging in forest that is near to Nillumbik. Research clearly shows that logging increases intensity of fires – thus increases speed and threat to Nillumbik residents
- Council must advocate for cessation of fuel reduction burns in surrounding forests. Research shows that forests are more prone to fire for 14 to 28 years after burns – this may apply to current fuel reduction burns as these are becoming increasingly hotter. In any case, fuel reduction burns should not be allowed in damp and wet forest as these burns may make the forest more fire prone – Research must be considered first. Council needs to consider advocacy for the health of our surrounding forests.

Nillumbik Bushfire Management Plan **Recommended changes to the draft**

Context

The initial statement that humans have used fire as a management tool for centuries requires the qualification that climate, weed loads, pest impacts and edge effects have greatly changed the circumstances. The past practices – even if determined correctly - are no longer an indication of appropriate behaviour today.

Causes

Causes need to be addressed, not just mentioned in the management plan;
The draft contains reference to arson, but no comment on mitigation of fire threat by reducing risk of arson
Planned burns to reduce fire threat should be minimised to reduce risk of planned burn escape
More emphasis should be placed on early detection of fires

Strategic Control 2 (Risk 1) - Agency Partnerships

Use prescribed fires as a mitigation measure only as a last resort

Prescribed burns carry significant side effects, such as ecological harms, both through

degrading faunal habitat and disadvantaging some plant species that require long fire-free intervals to complete their life cycle¹.

Areas impacted by planned burning in Nillumbik are often small and narrow, and weed infestation after these burns is often evident. Recent burning on Mine Rd has led to an increase in genista, phalaris and oxalis. Impact on the trees by the drying out of the soil, killing of moss, and changes in fungi and soil microbes may also be evident as areas previously burnt 2- 3 years ago on Mine Rd have had what appears to be a higher proportion of branch fall since the burn

Research on the **effectiveness of prescribed burns as a mitigation measure** shows that little to no leverage is achieved (the reduction in unplanned area burnt resulting from recent previous area burnt) across south-eastern Australia². In the Australian Alps National Parks research has shown that fires have been smaller and less severe in long-unburnt forests.³ The vegetation classes and location here differ but without any more relevant research, precautionary principals should apply.

Another side effect has been shown to be **negative consequences to human health** from smoke; Air pollution causes 3000 premature deaths each year⁴. (around 2.5 times the number of lives lost on Australia's roads in 2017).

Smoke from planned or unplanned fire contributes to this air pollution. Due to low leverage rates for most of Eastern Australia⁵, the overall area burnt, and smoke produced is increased by prescribed burns even when a subsequent unplanned burn occurs.

To minimise the risk of death and illness caused by smoke, any mitigation measures using fire should be used as a last resort.

Conclusions from research on the health impacts and deaths caused by hazard reduction burns in Sydney⁶ and Melbourne⁷ should be referred to in community education and in explaining the exclusion of fire as a mitigation measure.

Strategic Control 3 (Risk 1) - Active Advocacy

Include advocacy to eliminate the increased fire risk caused by logging state forests surrounding Nillumbik

Logging increases the risk and intensity of fire.^{8, 9} Fire in the surrounding state forests can

¹ **Interval Squeeze Altered fire regimes and demographic responses interact to threaten woody species persistence as climate changes.** N Enright et al, 2015

² **Biogeographical variation in the potential effectiveness of prescribed fire in south-eastern Australia** Owen F. Price^{1*}, Trent D. Penman², Ross A. Bradstock¹, Matthias M. Boer³ and Hamish Clarke^{4,5}

³ **Flammability dynamics in the Australian Alps** Zylstra, P. (2018) Flammability dynamics in the Australian Alps. *Austral Ecol.* DOI: 10.1111/aec.12594. <http://onlinelibrary.wiley.com/doi/10.1111/aec.12594/full>

⁴ **Health impacts of air pollution** 2016 Australia State of the Environment c Commonwealth of Australia

⁵ **Flammability dynamics in the Australian Alps** Zylstra, P. (2018) Flammability dynamics in the Australian Alps. *Austral Ecol.* DOI: 10.1111/aec.12594. <http://onlinelibrary.wiley.com/doi/10.1111/aec.12594/full>

⁶ **A rapid assessment of the impact of hazard reduction burning around Sydney, May 2016** Richard A Broome, Fay H Johnston, Joshua Horsley, Geoffrey G Morgan

⁷ **Forest Fire Smoke Exposures and Out-of-Hospital Cardiac Arrests in Melbourne, Australia: A Case-Crossover Study.** <https://www.ncbi.nlm.nih.gov/pubmed/25794411>

[Dennekamp M](#), [Straney LD](#), [Erbas B](#), [Abramson MJ](#), [Keywood M](#), [Smith K](#), [Sim MR](#), [Glass DC](#), [Del Monaco A](#), [Haikerwal A](#), [Tonkin AM](#).

⁸ **Logging can 'greatly increase' fire severity for 50 years, researchers say.** ABC Radio Posted 4 Aug 2014, 1:23pm

⁹ **Nonlinear Effects of Stand Age on Fire Severity**

Chris Taylor¹, Michael A. McCarthy², & David B. Lindenmayer³

spread to Nillumbik, so it is important that Nillumbik Council's advocacy work includes advocacy to cease logging in native forests around Nillumbik such as State forests in Mt Disappointment, Flowerdale, Kinglake, Toolangi, Warburton, Marysville and Healesville.

Control assessment

Control assessment 'A' needs to be modified to ensure past practices do not impact on decisions. Decisions should be based on current scientific evidence,

Delete points :

"Provides continuity with previous controls"

"Is current and does not require review"

There is no methodology described to determine the impact of the control. The impact on the management or reduction of risk should be determined by current scientific evidence not by past beliefs or personal opinion.

Choice of control measures be determined by current scientific evidence on the effectiveness of these control methods

Assessment of effectiveness of a control method be determined by current scientific evidence on the effectiveness of these control methods

The management plan should include at least the following current scientific research papers and control measures should be determined according to the conclusions drawn from these papers. The vegetation classes and location here differ but without any more relevant research, precautionary principals should apply.

Choice of control measures Include references to :

Flammability dynamics in the Australian Alps Zylstra, P. (2018) Flammability dynamics in the Australian Alps. *Austral Ecol.* DOI: 10.1111/aec.12594.
<http://onlinelibrary.wiley.com/doi/10.1111/aec.12594/full>

Biogeographical variation in the potential effectiveness of prescribed fire in south-eastern Australia Owen F. Price^{1*}, Trent D. Penman², Ross A. Bradstock¹, Matthias M. Boer^{3,5} and Hamish Clarke^{4,5}

Council communication

Include communication of the CSIRO research showing that fire behaviour is weather dominated not fuel dominated on code red days to ensure that residents are aware of the lack of impact of prior fuel reduction in code red situations.

Include communication of impacts of smoke on health and premature death rates.

Reserve management.

Ensure that reserve works comply with other vegetation regulations such as 52.17

regulations by inserting “Treatments applied in council reserves be limited to fuel reduced asset management zones in accord with the planning scheme. For all non-accommodation buildings, the asset management zone is 10 m. “

Without this clause there is a risk that native vegetation removal regulations will be contravened. Such contravention has already occurred. Council have a responsibility to ensure that its management plans do not encourage contravention of the planning scheme regulations

Slashing should be avoided in areas where native grasses and herbs dominate. Native grasses are shorter and more sparse than exotics. Often slashing of native grasses spreads seeds of exotic grasses resulting in the replacement of low, green native grass cover with tall exotic grasses which dry out in summer. To simplify management, slashing should be avoided in all reserves of high and moderate conservation value unless specifically nominated for slashing. Such high and moderate conservation value reserves often are dominated by low growing native grasses and herbs.


The plan should specify that slashing of native shrubs should only be allowed within 10 m of non – accommodation buildings to ensure compliance with native vegetation removal regulations.

Road management

Slashing should be avoided in areas where native grasses and herbs dominate. Native grasses are shorter and more sparse than exotics. Often slashing of native grasses spreads seeds of exotic grasses resulting in the replacement of low, green native grass cover with tall exotic grasses which dry out in summer. To simplify management, slashing should be avoided in all roadsides of high and moderate conservation value as specified in the Nillumbik Road Management Guidelines 2012 . Such high and moderate conservation value roadsides often are dominated by low growing native grasses and herbs.

Include also relevant management guidelines from the roadside management plan 2012 such as table 3 Overview of management guidelines based on conservation values:

Table 3. Overview of management guidelines based on Conservation Value

Conservation Value	Overview of management guidelines		
	Maintenance and access	New Works	Ecological Management
High Generally all layers of native vegetation present or significant species present	Minimise access to machinery Minimise removal of vegetation and avoid impacts to groundstorey	If new works are required, consult with Environmental Works Officer Permits likely to be required New works require detailed assessment to minimise impacts Consider relocating fuel reduction elsewhere	Highest concern for: <ul style="list-style-type: none"> • minimising disturbance • weed management • retaining ecological values and habitat 
Medium Significant presence of native vegetation including groundstorey	Undertake any required fuel modification sensitively	May be possible to locate new works without significant impacts to native vegetation Permit application may be avoidable May be suitable for fuel reduction	
Medium-Low Native vegetation present but the groundstorey weedy	Machinery access should not impact vegetation if care is taken to avoid tree root zones	Can locate new works without significant impacts in native vegetation Unlikely to require permit Most suitable for fuel reduction	
Low Very little or no native vegetation present	Machinery access should not impact vegetation if care is taken to avoid tree root zones		

“other”

delete clause “Other work carried out with the prime objective of providing amenity” Amenity is a personal opinion which will differ in as many ways as the number of people asked. Under “other” include measures to restore ecological health not “providing amenity”

Include in the guidelines the instruction to ensure all dead trees and dead branches requiring trimming are not cut back to the trunk, but left as stubs to allow hollows to form.

Submission to Draft Bushfire Mitigation Strategy 2019-2023

Shire of Nillumbik

I fully support the Shire of Nillumbik Draft Bushfire Mitigation Strategy 2019-2023 as a well thought out Document which properly deals with the bushfire risk in the Shire of Nillumbik. In particular, I strongly support the four priorities that shape the Bushfire Mitigation Strategy.

However, I wish to raise the following additional points:

The Shire of Nillumbik should implement the concept of Priority Fuel Management Areas (PFMAs) which is currently being discussed by the Port Phillip District Bushfire Strategy Advisory Group. PFMAs show where bushfire fuel treatments will most effectively reduce long-term bushfire risk to communities. These areas cross both public and private land tenure and should form part of bushfire management strategies;

The Shire of Nillumbik should review the Planning Controls on private land and public land, so that both private land owners and Authorities responsible for public land are not impeded from taking reasonable steps to clear bushfire fuel hazards from their land;

The Shire of Nillumbik should reassess the Environmental Significance of both roadsides and private land within the area of the Bushfire Management Overlay. The current Environmental Significance ratings are out of date. This rating should be undertaken by an expert recommended by Forest Fire Management Victoria;

The Shire of Nillumbik should encourage private land owners to use machinery to remove bushfire fuels from their properties, and should be advised by the Shire as to the best types of machinery to use. Many residents find the current recommended methods of removing bushfire fuels by hand or by spraying to be too onerous. As a consequence the residents find it all too hard, and properties soon become overrun by blackberries and other woody weeds;

The Shire of Nillumbik should work with the local Country Fire Authority Brigades to establish proper safety "buffer Zones" between the bushland reserves and private land holdings. Currently there is an extreme risk of fire moving from the bushland reserves into the rural townships;

The Shire of Nillumbik should be providing regular information to land owners on which plants are fire risks and which plants can't be removed as they are a protected species. This information should include advice on the process required by the land owner to get the necessary permission to remove the fire risk. The current process is very difficult and too expensive for the land owner;

The Shire of Nillumbik should coordinate the liaison between the community and the local Country Fire Authority Brigades so that the Brigades can assist the land owner in removing bushfire fuel from private land;

The Shire of Nillumbik should consider obtaining expert assistance in preparing the Implementation Plan for the Bushfire Mitigation Strategy. It is extremely important that an expert Implementation Plan is prepared;

The Shire of Nillumbik should work with the local Country Fire Authority Brigades and fund the implementation of “Information Evenings” in each of the townships within the Bushfire Management Overlay. The Information Evenings to include the following topics – Bushfire Mitigation Strategy and Implementation Plan, What landowners can and can’t do in relation to the removal of bushfire fuels from their properties, Bushfire Safety Advice.

Neil Marshall

Community Safety Coordinator, Panton Hill Fire Brigade

Member of Bushfire Strategy Advisory Group, Port Phillip Fire District.

R P & H GARDNER

7 June 2019

Nilumbik Shire Council (NSC)

Submission to the Draft Bushfire Mitigation Strategy 2019-2023 (DBMS)

Thank you for the opportunity to contribute to the DBMS, which will contribute to the Bushfire Mitigation Implementation Plan.

We fully support the approach that the Council (NSC) has taken in its preparation of and supporting arguments included in its Draft Document (DBMS). We recognise that bushfire mitigation is a shared responsibility between Council (NSC) and other agencies, private landowners, the community and in particular the responsible fire and emergency services.

We begin with the actions that ‘most of all protect life and property’. This is a strategy or strategies that cannot be subsumed under other assumed priorities, or neglected for ideological beliefs and opinions. Protecting life and property can coexist with protection of the environment. They are not mutually exclusive or dichotomies as they are so often argued to be by misinformed but well-meaning individuals. As the NSC draft strategy so well points out many people who have come to the urban fringe or to properties as a tree change, do not understand or have the capacity to prepare their properties.

As long-term residents on broad acre properties in Nilumbik, we believe that we have acquired extensive knowledge in rural land management and practical experience in both bushfire mitigation and defence. From October 1962 to June 1981 we lived on a property in rural Mount Pleasant Road and during this period we had six bushfires go through the property. We managed to protect the house each time but with loss of vegetation. Since 1981 we have lived in Bouchiers Road, Kangaroo Ground. The need to be able to manage the ground fuel on such properties is paramount.

About one quarter of our approximately nine-hectare property is treed, many of which we have planted as previously it had been a pig farm. From this quarter of the property every year we collect and burn over 60 cubic metres of leaves, bark and branches. It is most important that landowners have this ability to remove ground fuel rather than allow it to build up year after year.

The importance of bushfires being mitigated or contained within rural areas protects urban dwellers in close proximity to them. In such a fire prone area as Nilumbik, which is recognised as the most dangerous in the world, fire similar to Black Saturday, or worse from the effects of Climate Change, may not be stopped until at least major suburbs of Melbourne. We do not want another California 2018 or Canada 2018. It is important that the rural component is properly prepared for the fire season. This now begins earlier and ends later.

On these prepared properties, the flora and fauna can still flourish as they have done for millennia under Aboriginal practices, for example, grazing animals such as kangaroos, wallabies and wombats require open grasslands. The extensive birdlife in rural Nilumbik as well as the diversity of animals, are one of the main reasons that tourists and city dwellers come to our Green Wedge. We must continue to protect it for future generations.

Adjunct Associate Professor Heather Gardner OAM FAIEH (Hon) Life Member EHA MA
Rossley Paul Gardner Licensed Land Surveyor and Town Planner (Retired)

Bill Lord – Submission re draft Bushfire Mitigation Strategy 2019

Thank you for the opportunity to make a community submission and thank you for the very informative drop-in session which was very encouraging and is used in my submission.

The strategy draft and the information session include support for the following seven dot points:

1. It points out that this mitigation strategy is not for Extreme Weather fires – that cannot be stopped whatever the mitigation works.
2. Recognizes there is no place for a “Fire mitigation vs natural environment” approach if fire mitigation is to be acceptable to the whole community.
3. Recognizes that people of Nillumbik in the main live in the shire because of the communities’ emphasis on natural environment.
4. For proper bushfire protection the community needs proper education about how biodiversity should be improved by the fire mitigation strategies and not destroyed when both can be part of the same strategic aim.
5. Recognizes that weeds contribute hugely to fuel loads.
6. Climate Change must be acknowledged and considered within the strategy, but have positive actions included.
7. The strategy recognizes the need to be developed in conjunction with the new GWMP.

I will now submit comment to each of the above points so as to hopefully improve the strategy and hopefully all of these points will also continue to be in the strategy.

The bits where type is bolded are intended as possible action items to improve the draft strategy.

1. It points out that this mitigation strategy is not for Extreme Weather fires – that cannot be stopped whatever the mitigation works. (mention in strategy page 13)

This extremely important point is mentioned on page 13, “When the Fire Danger Rating is Extreme and Code Red, weather created by the fire, and ignition locations will be a key determinants of fire behaviour rather than fuel types or dryness. These are the days that fire will move into and through Nillumbik communities leaving destruction in its wake.” But, I believe it should also be clearly stated up front in the strategy.

My issue is if anyone queries a burn-off or any roadside slashing they are greeted with “do you want another 2009 fire of what?” yet this strategy clearly recognise that no amount of slashing and burn-offs will affect an extreme weather fire.

I suggest this limitation of bushfire mitigation should also be in the introduction or close to it – and perhaps in more straightforward language.

2. Recognizes there is no place for a “Fire mitigation vs natural environment” approach if fire mitigation is to be acceptable to the whole community. (Mentions in strategy pages 4, 5, 9, 10, quote on page 12, 13, 14[2.5])

*To recognise that we know very little about the complexities and interdependencies of the web of life; and need to practice the 'precautionary principle'. **Fire mitigation should reflect***

nature so only slash native grasses after they have seeded and any burning off in bush areas should be cool burns and not occur every year for example.

On page 13 the strategy says:

2. Balancing environmental protection with bushfire risk

Council will work to strike a balance between working to reducing the threat of bushfire and the impact on private property and businesses and protecting the environment, including the shire's unique flora and fauna."

What is the need for this to sound so competitive when the aims of these groups could/should be the same?

What about rewording the Bushfire to:

"Council will work to reduce the threat of bushfire and its impact on private property, businesses and protecting the environment, including the shire's unique flora and fauna."

[Also see point C on my last page for application of this principle to the *Emergency Management Future Directions Plan*]

3. Recognizes that people of Nillumbik in the main live in the shire because of the communities' emphasis on natural environment. (mentions in strategy pages 4, 5, 9, 10, 13.)

To recognise that we know very little about the complexities and interdependencies of the web of life; and need to practice the 'precautionary principle' within the Nillumbik community.

Fire mitigation should reflect nature so only slash native grasses after they have seeded and any burning off in bush areas should be cool burns and not occur every year.

Misinformation is also a problem. Some scream that having low storey 'bush' on road reserves creates 'wicks'. A fire in a cleared paddock it will travel a lot faster across the paddock including forward spot fires, than along the indigenous scrub road reserve. Eg the most recent Lancefield and Barford/Redesdale fires showed this. Of course if the road reserve is in a bush area, it is no more of a 'wick' than the rest of the bush.

Curbing of such misinformation will be helped, if it is accompanied with the need for Box Clearing of the road for vehicles as mentioned on page 14, Goal 1.3.

4. For proper bushfire protection the community needs proper education about how biodiversity should be improved by the fire mitigation strategies and not destroyed when both can be part of the same strategic aim. (mentions in strategy pages 5, 10, 15[2.5])

It is easy for the strategy to justify large trees not being removed as they are a blocker of radiant heat, but for healthy survival the large trees are part of a close ecosystem that includes the understorey and ground cover vegetation. In the draft, biodiversity is recognized (page 10) as being important, so the strategy now needs 'action'.

We hear we need stronger protection of lower & medium storey indigenous vegetation, but why not just slash or burn it?

Nillumbik people love trees and local wildlife, but to provide very valuable habitat & food for wildlife there must be ground cover and middle storey plants. I.e. Biodiversity.

A successful plan for bushfire mitigation must not make slashing and burn-offs an annual occurrence and the strategy needs to mention this so the community are aware and more likely then to support the bushfire mitigation that must occur. Like many other issues, the community, includes the CFA brigades.

5. Recognizes that weeds contribute hugely to fuel loads. (mentions in strategy pages 15[2.5])

To develop a systems view of the natural world - that it is all connected but weeds do not help fire mitigation or the natural indigenous environment.

EG1 Adelaide Hills Council did a lot of roadside fire mitigation testing to compare the result of biomass difference between pasture weeds and indigenous grasses.

EG2: On roadside reserves introduced pasture grasses (eg Phalaris) and weeds (eg blackberries) generally have a far greater biomass (read fuel load) than indigenous grasses eg Poa, Kangaroo Grass, etc. So when mapping for burning off for fire mitigation purposes have Council Enviro Dept look at the plant type first and include this in the strategy.

EG3: The strategy could suggest that Council fund and use the Environment Dept resources to weed particular road reserves of pasture grasses and so help the native grasses to take over and thus help bushfire mitigation.

6. Climate Change must be acknowledged and considered within the strategy, but have positive actions included. (mentions in strategy pages 10, .)

Within Nillumbik Council can consider land management strategies in the context of ecosystems and the two global crises of climate change and biodiversity loss. **Bushfire Mitigation Strategy should directly address these two issues by working with Council planning enforcement officers on land management issues both for Council and for private land.**

7. The strategy recognizes the need to be developed in conjunction with the new GWMP. (mentions in strategy pages 4, 14.)

For slashing and burning Council land, including roadside reserves the Council Environment Department through the GWMP should be consulted first to check out indigenous plants and weeds and anything particularly vulnerable.

To recognise that the natural environment is being pushed back, but rarely forward, **so fire mitigation should also be used in conjunction with GWMP to foster better natural environment wherever possible.**

Those officers implementing the Bushfire Mitigation Strategy and those Council Planners implementing the GWMP should also be meeting to ensure they are not working at cross purposes. And this needs recording in the Bushfire Mitigation Strategy.

Other considerations

- A. The Bushfire Mitigation Strategy (BMS) must be consistent with the Bushfire Management overlays (BMO) and new Green Wedge Management Plan GWMP. However while there is no need for duplication it would be worthwhile throughout the BMS to refer to BMO or GWMP when appropriate, particularly the BMO as they always take precedence.
BTW. My quick search only found 2 references to the GWMP (pages 4, 14) but only one reference to the BMOs and that was only a comment in describing Nillumbik Shire on page 6.
- B. **On page 6 paragraphs three and five need rewriting to be factual but I think Craig may have the planners onto this one already.:-)**
- C. NB on page 4 of the The Emergency Management Future Directions Plan it says"
"The Emergency Management Future Directions Plan will be presented to Council and should be viewed in conjunction with the Bushfire Mitigation Strategy and the Green Wedge Management Plan. These are both strategic documents of importance and have significant alignment with each other to achieve a balanced and integrated approach between environmental and bushfire issues."

So to be consistent with point 2 above, let's get rid of the balancing and have:

"The Emergency Management Future Directions Plan will be presented to Council and should be viewed in conjunction with the Bushfire Mitigation Strategy and the Green Wedge Management Plan. These are both strategic documents of importance and have significant alignment with each other to achieve an balanced and integrated approach between environmental and bushfire issues."

Ms Naumoski refers to the “need to improve the way we prevent, prepare for, respond to and recover from fire.(page 5 DBMS) whereas the Victorian Bushfires Royal Commission (VBRC) highlighted a report that “called on governments to engage in a ‘paradigm shift ‘and embrace mitigation rather than focusing on recovery from natural disaster.”(VBRC Interim Report page 280.)

Blaga says a “community-centric model “is needed and continually emphasises “shared responsibility “,”agency collaboration “.(page 6 DBMS) while the VBRC uses the expression “shared responsibility” differently to mean “...individual property owners should maintain their property in a manner that reduces risk from bushfires .(p.352 Final Report vol.11 Part Two VBRC)

Blaga also says bushfires “have left a significant scar...which has called for a new approach to bushfire management.(page 7 DBMS)The VBRC did not want a new approach,saying instead, “The State has failed to respond to numerous recommendations and provide the necessary resourcing for increased prescribed burning...The Commission considers that a target of 5 to 8 per cent prescribed burning of public land is necessary for community safety and would not pose unacceptable environmental risks... .(Final Report vol 11 part two page 295 VBRC)

Blaga’s comments would indicate that she doesn’t realise that the entire area of Nillumbik has been part of metropolitan Melbourne for more than 30 years. The rural/urban interface is within the shire adjoining the urban growth boundary.(rural/urban interface page 10 DBMP)

I am sincerely yours, June English of [REDACTED]
Phone [REDACTED]