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I am making this submission as	Resident
Submission type	Organisation
Organisation making the submission (if applicable)	Ecological Surveys & Planning
Your position in the organisation (if applicable)	Manager
Consent to make submission public	Public
Your story	
1.1 Causes and contributing factors	<p>I am concerned that a combination of NPWS policy and acute and chronic under-resourcing of that agency means that large areas of conservation estate had not been burnt or allowed to burn for many decades. Irrespective of the effectiveness of 'hazard reduction' burning under extreme fire weather, such long post-fire intervals in sclerophyll vegetation are inconsistent with ecological knowledge and DPIE's own data and advice on fire intervals. Wilderness Areas containing sclerophyll ecological communities should not be left unburnt for many decades, but should instead be subject to scientifically determined burning regimes to the extent that changing climate permits this. This is likely to generate some biodiversity benefits whilst also reducing fuel loads and reducing fuel flammability and ability to generate crown fires. I note that in my area (northern Morton NP), NPWS had dutifully completed hazard reduction burns in several SFAZs,</p>

but that some of that work had been delayed by unsuitable conditions (too dry, too likely to result in escape of fire). I also note that all of the SFAZs that had been burnt on schedule burnt again in the NYE wildfire or in subsequent backburns. There may need to be a reconsideration of the extent of SFAZs and of non-fire-based fuel reduction in higher risk areas where climate no longer allows for sufficiently frequent or sufficiently intense fire to reduce fuels. Some boundaries may also need to have informal fire breaks converted to well-designed and regularly maintained fire trails with appropriate access controls.

1.2 Preparation and planning

There is currently inconsistency in the level of qualifications that a person undertaking statutory bushfire risk assessment (for Development Application) is required to hold. Some Councils require BPAD L2 or L3 certification, others have no such requirements. I advocate that Government adopt BPAD certification of at least L2 as a minimum standard for the preparation of bushfire risk assessment and that it legislate accordingly. The current situation does not provide a sufficiently high level of training for assessors, and sees different standards applied across different LGAs. I note that I do not undertake assessments of that nature, so have no conflict of interest in this matter. My concern is only for an appropriate level of training, consistency, and ability to scrutinise and correct work done by assessors, or to suspend or ban assessors who are found to be incompetent or corrupt, etc. I also suggest Government consider whether it is appropriate for the same person to undertake a bushfire risk assessment and a statutory ecological assessment for the same DA, given the potential for this to cause or give rise to a perception of a conflict of interest. This matter would also require regulatory change.

Another matter entails local government's acute lack of preparedness for bushfire related evacuations and other activities. Much of my township of Bundanoon evacuated during the NYE wildfire - not due to an evacuation order, but due to a panicked local driving around and shouting at people to leave, with many people apparently believing that they had been directed to leave by a fire or police officer. This resulted in a very late exodus that occurred at a time when three out of four escape routes by road were blocked by fire. These were extreme conditions, and fire that night in that area was not forecast. But my concern is that Council had not undertaken any roadside vegetation management in the context of vehicle safety for both evacuees and for emergency services. Roadside are often weedy, and generally unmanaged. This includes numerous plantings and naturalisations of highly flammable pines. I am not recommending total clearance of roadsides, especially given that some contain significant remnants of Critically Endangered ecological communities and threatened species. But even those areas can be under-pruned to reduce fuel loads and potential radiant heat and ember attack at vehicle heights. Other areas are just weedy and can be cleared then maintained by mowing. Highly flammable invasive tree and shrub species should be removed, but the cost of removing the trees over many kilometres of roadsides is far greater than Council's finances would allow. This would require significant investment by higher levels of government. On the positive side, such work would generate local employment, would improve general road user safety, may improve amenity, and might promote greater continued awareness of the need for bushfire preparedness, especially if designated escape routes are clearly signposted as such and seen to be regularly maintained.

Another issue came to my attention whilst taking photos of a burnt property to assist the owner with her insurance claim. A row of mature conifers along a boundary had burnt, and were apparently a major factor in the total loss of the

garage/carport/shed. The Trees (Disputes between neighbours) Act currently exempts rural and rural-residential land from Part 2A. This includes 'large lot residential' properties. Part 2A sets a height limit on coniferous and other hedges. Having seen several instances of where such hedges burnt and became apparent sources of radiant heat and ember attack on large-lot residential and rural-residential sites in designated bushfire prone areas, I strongly encourage Government to revise Part 2A of this Act to remove the exemption for at least rural-residential and large-lot residential zonings in designated bushfire prone areas. This could reduce bushfire fuel loads and sources of radiant heat and ember attack near dwellings, especially for those approved prior to Planning for Bushfire Protection.

I noted that too many residential and rural-residential properties in my area showed very low levels of bushfire preparedness. Some were dangerously overgrown and should have earlier been served with breach notices by fire authorities. Council assists with some circumstances of this nature through the Local Govt Act but does not have a regular inspection regime in place due to resource constraints. Fire authorities did undertake some pre-fire 'door knocks' to ask residents about their fire plans and whether there was a Static Water Supply present, but prior to this stage, there were no property inspections in relation to levels of hazard. I encourage government to legislate and provide resources that would enable fire authorities to routinely inspect properties in designated bushfire prone areas (and potentially beyond, given recent fire behaviour) and to be able to order reasonable measures in relation to fuel treatment. I am aware that some land owners and tenants would rather lose their property to fire than clear vegetation that they are attached to or that they feel provides them with essential privacy. However, such a position can put other nearby homes at risk if that site and its unmanaged vegetation ignites. I don't believe that such personal preferences should be allowed to put other homes and potentially lives at risk.

1.3 Response to bushfires

I want to strongly praise the exceptional efforts of fire fighters and their support personnel. I'd like to see funding for retained RFS staff rather than the current very heavy reliance on volunteers. There also seems to be merit in combining RFS and F&R into a single fire authority.

1.4 Any other matters

Some areas have been badly damaged by fire breaks and trails installed hastily during the emergency. This includes within conservation estate. Given how long-under-resourced the NPWS has been, I believe it needs additional funds to repair damage of this kind. In some cases, this entails removing trees that were pushed down and dumped into watercourses to form 'bridges' over which some vehicles could drive. It also entails major sediment and erosion hazards that warrant regeneration. Some sites may also need to be re-engineered and retained as strategic assets, which again can entail great cost.

I encourage Government to thoroughly examine the vulnerability of aerial power supplies in the context of bushfire and storm. All too often, lines are brought down or burnt down, only to be replaced with the same or similar products that are equally vulnerable to failure. I suggest that most of the electricity network should be buried and appropriately protected from fire (including from burning tree roots that destroyed some underground lines). Perhaps only the highest voltage lines could remain aerial, and the easements beneath them could perhaps be formalised as fire trails and breaks. Due to significant problems with pest animals and plants taking advantage of those easements, appropriate control measures and funding would be required.

We need to make our electricity infrastructure much more robust and future-proof. It fails too readily. This includes loss of vital

communication infrastructure, and of power to water treatment and pumping systems, and to sewerage treatment systems. I encourage greater local power generation, along with greater battery storage to provide increased resilience.

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