Planning and Development Controls for Bushfire Prone Areas

A previous paper was prepared for a seminar arranged by the Co-ordinating Committee of the Bushfire Council of New South Wales in December 1983. This seminar was held in Merimbula on the South Coast of New South Wales and entitled "Development in Fire Prone Areas — Planning or Disaster". I submitted this paper on behalf of the New South Wales Department of Planning and Environment in my capacity as the Regional Manager of the South East Region. The purpose of the paper was to advise on the requirements of the Environmental Planning Assessment Act , 1979 in relation to Bush Fire Management in fringe development areas. A copy is at Attachment "A" for information.

The recommendations set out in that paper can be summarised as follows:

Action could be taken by the fire control officers of relevant organisation for the development of **fire hazard maps** as part of their existing management programmes. These would be for areas for which those organisations have responsibility in relation to **bush fire risk management**. This action would be a step in assessing areas for particular management strategies for use in preparation of *local environmental plans* (LEPs). These plans would be part of the planning needed for the future prevention or minimisation of impact that will arise from future bush fire events.

A cursory review of the extent to which the recommended actions have been taken since 1983 shows an extensive number of Bush Fire Risk Management Plans (BRMP) have been prepared by local councils in New South Wales. However no assessment has been made of what planning and development control measures have followed the preparation of these BRMPs.

In the light of the devastation that has occurred in the 2019/2020 bush fires in New South Wales and across Australia, it would be informative to assess the extent to which follow up action has been taken where BRMPs have been prepared, and how these have been followed up with planning controls in LEPs and other planning documents. And further how these controls have been pursued in development controls and in environmental management regrading bush fire impact minimisation.

In other words, how effective have the measures been or what other steps can be taken in planning and development control terms to improve safety of settlements and how to reduce property damage in the future while minimising the consequential impact on the managed environment.

The following notes are directed to improved steps that may be taken for better outcomes in planning for risk management of bush fire prone areas. This may be of use in subsequent Inquiries that are to be conducted in the follow-up to the recent fires.

Planning Actions Assessment

Planning Action under the Environmental Planning Legislation as specified in the attached Paper would need to be updated since the Paper was prepared some time ago.

The presumption is that there is a continuing need for Environmental Studies to be carried out before planning controls are incorporated in planning instrument and development controls.

The scope of Environmental Studies would need to include evaluation of the risk level of bush fire impacts on areas near or adjacent to urban and rural residential areas.

There should also be an evaluation of how effective, or ineffective, the specific measures that have been included in existing planning instruments and development controls have been in reducing impact from bush fires. These could be rated as:

highly successful for areas where there was minimal or no impact on property in the face of severe fire activity.

Moderately successful in that there were perceived benefits from planning measures. Could be compared with highly successful measures to see if future controls could be of a similar standard to the more effective controls experienced elsewhere.

Totally inadequate in that there was no benefit from planning measures applied. Significant destruction occurred notwithstanding the planning controls adopted. New approaches required.

Analysis along these lines should assist in future planning measures to mitigate bushfire risk.

Approaches

The apparent failure of existing planning measures taken to protect life and property, as experienced in the current crisis, indicates the need to be better prepared through updated planning controls along with increased firefighting resources available across Australia.

What measures would be better remains to be investigated through the current Inquiries. However one suggestion for investigation would be through extensive all group consultation to develop a significant **buffer zone** between high bush fire risk areas and urban settlement areas. The extent of these buffer zones would depend on a range of scenarios and local knowledge such as prevailing winds, accessibility for firefighting purposes, conservation measures for wildlife and flora, response times for dealing with fires, suppression infrastructure deployment and environmental management programmes.

Without having expert knowledge in the field of fire management and control, some assessment of risk is likely to be influenced by fire movement patterns. Those with knowledge could assess the

extent of a managed **buffer zone** in size and location. This would allow the best chance of defending life and property in front of a fire. The management of such a buffer zone would possibly be a responsibility of local government financed through local rates and State subsidies.

There is an expectation that there needs to be a new way of looking at the interface between high bush fire risk areas and settlement. Compromises in planning and management of immediate interfaces appears unavoidable. This includes the determination of areas for expansion of settlement or for preservation of flora and fauna and acceptance that there is a vital role for a buffer or moderation zone as part of future planning solutions.

Referred for consideration by Inquiries into the recent bushfire events and impacts.

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1 February 2020.

REQUIREMENTS OF THE ENVIRONMENTAL PLANNING AND ASSESSMENT ACT, 1979 IN RELATION TO BUSH FIRE MANAGEMENT IN FRINGE DEVELOPMENT AREAS

Paper presented to the Seminar "Development in Fire Prone Areas - Planning or Disaster?" arranged by the Co-ordinating Committee of the Bush Fire Council of New South Wales and held at Merimbula, New South Wales, December, 1983.

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INTRODUCTION

Bush fires like many other natural hazards have been with us for a long time and its certain that they will remain with us for the future. Whether uncontrolled bush fires have been started naturally or by man, the results on the environment have generally been the same. However, with increased development taking place in areas adjacent to bush land the risk of damage in terms of property and safety has also increased.

By taking precautions or specific action before the occurrence of a bush fire the risk of damage can be greatly reduced. This in essence is planning. Planning can take a number of forms such as measures taken by bush fire control officers at the local level, co-ordination carried out by organisations such as the Bush Fire Council of New South Wales and by land use planning that can be achieved through the Environmental Planning and Assessment Act, 1979. Building regulations can also play an important role in the overall approach to limiting risk in the event of bush fires. So, many groups play a part in dealing with this hazard.

Today I have been invited to talk to you about the requirements of the Environmental Planning and Assessment Act in relation to bush fire management in fringe development areas and the role of the Department in this area. This type of seminar has been arranged on other occasions and I understand that papers presented to a similar seminar held at Macquarie University, Sydney in July 1983 have been made available to you. One of the papers, presented by Mr. John Bosward, Executive Officer, of the Environment Protection Division of the Department, covers the relevant aspects of environmental planning in relation to bush fire hazards. Rather than repeat all of that paper I will summarise its main points and add where I can to the detailed measures that can be taken under the various sections of the planning legislation.

Overview of Environmental Planning and Assessment Act

As background, it is useful to understand the basic structure of the Act. Like all pieces of legislation it provides its own sense of mystery in terms of terminology, interpretation and structure but in general terms it can be summarised in the following way -

Part I of the Act

This Preliminary Part includes a description of the objects of the Act which are crucial to the proper implementation of the Act. The objects are:-

- (a) to encourage -
 - (i) the proper management, development and conservation of natural and man-made resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment;
 - (ii) the promotion and co-ordination of the orderly and economic use and development of land;
 - (iii) the protection, provision and co-ordination of communication and utility services;
 - (iv) the provision of land for public purposes;
 - (v) the provision and co-ordination of community services and facilities; and
 - (vi) the protection of the environment;
 - (b) to promote the sharing of the responsibility for environmental planning between the different levels of government in the State; and
 - (c) to provide increased opportunity for public involvement and participation in environmental planning and assessment.

This statement of objectives reveals that environmental planning is now broader and more comprehensive than the concept of town planning which operated under the former legislation.

Environmental planning is directed to questions of land resource allocation and use. The essential difference of this approach, to that taken under the Local Government act, is its more complete concern for and comprehension of community and environmental issues relating to planning decisions. The statement of objectives indicates an integration of land use planning and techniques for environmental protection with respect to assessing the capability of the environment to support planned change or planned non-change.

Environmental planning also provides that an examination of the environment is to be undertaken as a prelude to the making of major planning decisions. Such a study would determine the capacity of land to support alternative uses and necessitates examination of social and economic as well as physical circumstances. In essence, planning decisions would take into account the capacity of the environment to accept development.

Part II of the Act

This part covers administrative arrangements for the achievement of environmental planning. Perhaps the most relevant aspect of this section is the scope for establishment of committees to consider and advise on matters related to environmental planning.

The Advisory Co-ordinating Committee as one such Committee generally acts to co-ordinate the operations of government departments in relation to environmental planning and is established to advise the Minister on the achievements of the objects of the Act. This committee is consulted on the preparation of State and Regional Plans which may cover aspects such as development in relation to hazard areas.

A number of regional committees have also been established under Section 22 of the Act to advise the Minister and/or the Director of the Department on planning and development matters. One such committee is the South Coast Planning and Development Committee which is able to address issues such as development in relation to bush fire prone areas on the South Coast.

Part III of the Act

The Act then sets out provisions for the preparation of a number of different types of environmental planning instruments, namely State Environmental Planning Policies, Regional Environmental Plans, Local Environmental Plans and Development Control Plans.

The provisions that can be included in any environmental planning instrument (including state, regional or local plans) may be, inter alia, any of the following:-

- (a) protecting, improving or utilising, to the best advantage, the environment;
- (b) controlling (whether by the imposing of development standards or otherwise) development;
- (e) protecting or preserving trees or vegetation;
- (f) controlling any act, matter or thing for or with respect to which provision may be made under paragraph (a) or (e);
- (h) such other matters as are authorised or required to be included in the environmental planning instrument by this or any other Act.

State Policies are plans prepared by the Department that can cover matters of significance for environmental planning for the State. It would be possible for State Environmental Planning Policies to address matters related to bushfire prone areas on a State wide basis.

Regional Environmental Plans are plans prepared by the Department for regional issues. The State is divided into a number of regions for administrative purposes. The South East Region, administered by the Queanbeyan office of the Department, covers 16 local government areas. However, a region for the purposes of the Act can be declared (Section 6) to cover any land.

Most regional planning considerations in the South East Region have so far been concentrated on the Coastal, South Western and ACT sub-regions. It would also be possible to include within a regional plan, policies and measures related to bush fire prone areas.

Local Environmental Plans are initiated by local government and these plans can cover a Shire wide area or an area as small as a single block of land.

As an example of provisions included in local planning instruments Sutherland Shire Council as early as 1971 included a clause in its plan to the effect that the Council shall not grant consent to development in the area (Menai) unless and until "arrangements are made satisfactory to the owner of such land so as to reduce the risk of fire to the land, the subject of this Order, and to limit the spread of fire thereon".

Another example of specific planning measures in relation to fire control was that of the Blue Mountains City Planning Scheme where the initial proposal for urban development was reduced substantially to exclude land with slopes of greater than 1 in 6, all land beyond the escarpment and all isolated ridges. The Council also requires a perimeter road or reservation as a condition of subdivision.

where a council considers it necessary or desirable to provide more detailed provisions than are contained in a local environmental plan it may under S.72 of the Act prepare a development control plan. Such detailed plans can deal with matters that are sometimes expressed in local codes and could include control of development in fire hazard zones. As an example of such a code I refer you to the paper prepared by G.M. McCully Shire Planner, Shire of Hawkesbury presented to the July seminar held in Sydney.

Part IV of the Act.

This Part deals with development control. That is, with the environmental considerations of development which is permissible with the consent of the local Council. In determining whether land can be used for a particular purpose, or whether a particular use can be carried on in a building, a council, under Section 90, is empowered to consider a number of factors. One such factor is:

(g) Whether the land to which that development application relates is unsuitable for the development by reason of its being, or being likely to be, subject to flooding, tidal inundation, subsidence, slip or bush fire or any other risk.

The ther such a risk exists is for the determing authority to decide. But here the findings of environmental studies and the like, undertaken during the preparation of a plan, are of importance. If a development is a "designated development" under the Act then an IIS is required before the application is decided. If not, it is open to the Council under S.77 to request sufficient information relevant to any application to enable it to be satisfied about environmental impact. This can include the likely risk of bush fire of the area and its effects on the subject and A.

If a Council decides to approve of development it may attach conditions to its approval in relation to minimising bush fire risk on the land.

If an applicant is dissatisfied with any refusal by the Council or with any conditions attached to its approval the applicant may appeal against the decision to the Land and Environment Court.

It is interesting in this respect to note a recent decision of the Court re Terama Pastoral Co. Ltd - v - Bega Valley Shire Council, July 1983 (Lett's Mountain). The application concerned rural residential subdivision and while the decision of the Council was upheld substantially on other grounds, the Court had regard to matters of bush fire risk as evidencedby the extracts quoted below:

"The third ground for rejection by Council went to a potential for bushfire danger. Prima facie, being located in isolated, steeply sloping, elevated, tree covered mountainous country, virtually surrounded by forest and with very poor access through bushland, the site appears to be at risk from a bushfire threat. The possible location of an additional sixteen families concentrated on this site would represent a possible substantial increased danger to life in the event of a bushfire.

On the evidence it would have to be said that this particular area has been free from bushfires to date. The bushfire risk may be said in that regard to be relatively lower than in other forest areas. There would be a danger to infer from this that there was no bushfire risk. It is possible that some of the land affected by the disastrous fires of South Australia and Victoria earlier this year may previously not have had a high bushfire record. The introduction of more people into this area may incidental thereto increase the bushfire risk due to the use of fire in domestic and other uses likely to be carried out on the land which may require burning off, etc"; and

"Item (g)(Section 90 of the Act) is a serious head of consideration which should not be lightly brushed aside, as it appears it may have been when Council recently approved the subdivision of portion 111 into four new lots.

The area is "likely to be" subject to bushfire and serious attempts to reduce that problem would increase the other risks of slip and erosion.

Without some positive proposal to solve this potential bushfire risk, including the upgrading of access out of the area, which can be shown to be effective without increasing the other risks, subsection (g) of section 90 of the Act mitigates against this application".

5.

Part V of the Act.

Where development is proposed by a public authority and it is not subject to consent under Part IV of the Act, it is regarded as an "activity". If the proponent is of the view that the development is likely to have a significant effect on the environment then an EIS is necessary before deciding on whether and how the project should continue. While the main aim of an EIS is to assess the impact of a project on the environment it also enables an assessment to be made of the implications of that development in the environment. This fact is evident from the list of matters, under the Regulation to the Act (Clause 57), that shall be included in any EIS, vide "(d) identification and analysis of the likely environmental interactions between the proposed activity and the environment".

The remaining Parts of the Act are of an administrative nature and not directly relevant to the topic.

PREPARATION OF ENVIRONMENTAL PLANS

Having outlined the types of plans that are possible under the legislation I would like to now explain some of the aspects of plan preparation processes which take into consideration the impact of bush fire hazard.

Firstly the most appropriate form of plan to consider this type of issue, in the context of local knowledge and conditions, is the local environmental plan. In cases where a local plan is to cover a wide area or a substantial issue it is likely that an environmental study would be prepared as a prelude to preparing a draft plan.

An environmental study enables a full assessment of the environment of an area to be made prior to considering the form and content of a plan. Hazard areas such as fire prone land can be mapped as a constraint on development. One such method, which I will outline, basically involves classifying land according to a number of parameters and then assigning a fire risk value to the land.

The first step is to determine which of the State's fire hazard zones the land concerned falls into. The State is divided into 3 such zones: Eastern, Central and Western. Having determined the appropriate zone, three core factors are mapped covering:

- (1) Vegetation,
- (2) Terrain, and
- (3) Fire season frequency

The Vegetation classes and ratings for the Eastern Zone are:-

Wet sclerophyll forest
Dry sclerophyll forest
Woodland
Coastal shrubland
Coastal heath
Rainforest
Swamp forest
1

The terrain classes (reflecting the predominant slope) and ratings are:-

Gorges and mountains (over 35% slope) 5
Steep hills (20-33% slope) 4
Rolling hills (10-20% slope) 3
Undulating (5-10% slope) 2
Plains (under 5% slope) 1

The third core factor of Fire Season Frequency is assessed as:-

Every year or so

Every 5 years

Every 10 years

Every 20 years

Every 50 years or less

Having determined which values apply to each core factor the sum of the core factor ratings place the land units into either a High, Moderate or Low category of fire proneness. A further assessment by way of a modifier factor (based on fire history, existing development, egress and fire fighting services) is made of the Moderate class land to see if it needs to be moved into the High risk class.

When the area is finally mapped this provides the Town Planner with valuable information which, together with other information on the environment, enables a decision to be reached on the contents of a draft environmental plan for the area. As part of the planning process the study information, and any draft plan flowing from that information, is subject to public comment before a final plan is formulated and adopted.

Aspects of the system of evaluation and classification described are set out in more detail in the Department's "Rural Land Evaluation Manual".

GUIDELINES ON DEVELOPMENT ADJACENT TO FIRE PRONE BUSHLAND

The Department and its predecessors have provided advice to Councils on control of development of land in a number of circular; letters and publications:-

(i) Circular No.16 - "Bush Fire Control and Urban
Development in the Sydney
Region" Planning and Environment
Commission 25th August, 1977.
(Gircular 23 of 13th April, 1978
restated the situation where
development should not be
permitted).

(ii) "Rural Land Evaluation Manual" Chapter 5 -

Department of Environment and Planning, November, 1981.

(iii) Draft Circular - "Planning for fire prone areas" (Intended to replace Circulars 16 and 23) Department of Environment and Planning, 22nd April, 1983.

At present the draft amending circular has been prepared by the Department to replace previous circulars on the issue. Comments from bodies consulted on its contents are still being assessed. The draft circular is available and it is not intended to reproduce it in this paper. However it is of value to refer to the main aspects of the draft circular:

(i) Objectives The circular is aimed at making planners more aware of bushfire hazards and to provide a set of planning controls to minimise the threat from bush fires.

(ii) Role of Planning Controls

Measures can be taken to exclude development from areas of significant hazard or for control of development to minimise its vulnerability. Also protective measures can be taken by fire fighting organisations.

(iii) Central Consideration

A central theme to the circular is the need for a perimeter road reservation or fire trail surrounding a development, together with the provision of adjacent strips of land within which varying degrees of hazard reduction are required.

(iv) Existing Legislation

The draft circular provides a review of bush fire legislation and administration in N.S.W. It also defines the powers and responsibilities of local councils in this matter and the fact that provisions for the protection against bush fires have in some cases been included in planning instruments and subdivision codes by Councils.

(v) Mapping of Fire Hazard Areas

The method for mapping of fire hazard areas, (as described earlier) as taken from Chapter Five of the "Rural Land Evaluation Manual" published by the Department of Environment and Planning, 1981, is referred to. This method is used in the preparation of local environmental plans either as part of a formal environmental study under the Act or as part of information gathering normally conducted before a draft plan is prepared.

(vi) Planning Options

For areas found to have High or Medium hazard ratings there are two main options:

- (i) exclusion of development. This can be an option where alternatives exist or the cost to the community in terms of direct costs or environmental costs is unacceptable.
- (ii) Protect areas from fire through design of development or planning provisions for urban development.

(vii) Planning Controls

The Perimeter Reservation. In all areas of "High" bush fire hazard, and where appropriate in areas of "Medium" hazard, the development should be circumscribed by a perimeter reservation. It is most desirable that this takes the form of a perimeter road located between the final building blocks and the bushland. It should have a minimum cleared or trittered width of 6m, a minimum formed width of 4m and a maximum gradient of one in six.

An alternative to a road in areas of rough terrain is a reservation which incorporates a fire trail.

- bush fire hazard and, where appropriate, in areas of "Medium" hazard, a Fire radiation zone should be established on the hazard side of the perimeter reservation. The width of the radiation zone around the perimeter of development should vary according to the slope of the terrain.
- Depth of residential blocks. There should be a minimum depth of perimeter blocks depending on the predominant slope of the land. This creates an "Inner Zone" to supplement the perimeter reservation.
- Perimeter Length. It should be a principle of all subdivision design that the hazard perimeter should not be long or convoluted.
- Progressive Land Release. Expansion of development into bushland should be controlled by progressive releases. In this way development will be protected as it grows.
- Access in Rural Residential Subdivisions. All new areas of rural - residential subdivisions should be provided with a two direction, two wheel drive through road. Access to individual properties should join directly to this road.
- Perimeter Trails. A perimeter fire trail surrounding isolated dwellings should intersect with the access route to the property.

(viii) Recommendations from Bushfire Authorities.

The draft circular goes on to describe the availability of information on hazard reduction and building design. This is contained in three main publications:

- (i) Bush Fire Protection Safety and Survival issued by the Bush Fire Council of N.S.W.
- (ii) Isn't It Tragic But it could be you" issued by the Bush Fire Council of N.S.W.
- (iii) "Hazard Reduction for the Protection of Buildings in Bushland Areas" issued by the M.S.W. Fire Brigades Board of Fire Commissioners.

A further reference regarding landscaping advice in rural residential development is -

"Forest Fires, Ornamental Trees and Houses" issued by the N.S.W. Forestry Commission.

Summary

In summary the areas where urban development should be restricted due to bush fire hazard are where:-

- . there is a history of serious bush fires
- the land slope exceeds 1 in 6
- water is not available at sufficient pressure for fighting a fire.

In areas where the threat of bush fires does not preclude development but is still a hazard to be guarded against:-

- . a perimeter road or reservation should be provided;
- the perimeter road or reservation should be located alongside a fire radiation belt;
- . the fire radiation belt should be of adequate width, clear of undergrowth and capable of access from the local road system;
- expansion into the fire hazard area should be on a progressive basis;
- any other matters which the Bush Fire Prevention Association or the Co-ordinating Committee of the Bush Fire Council considers of importance must be taken into account. Where land adjoins a national park, the National Parks and Wildlife Service should be consulted, (and similarly there should be consultation with Forestry Commission where areas are near forests).

CONSERVATION CONSIDERATIONS

It is important to recognise in the process of evaluating development control and measures for management of bush fire hazard areas that there are broad environmental considerations to be taken into account.

There are different views as to the best way to manage the environment as a precaution against bush fire hazard. As well as providing a threat to development, including property damage and potential loss of life if bush fires burn out of control, bushland provides a valuable recreational and ecological reserve.

Proponents of vegetation management say it can play a positive and non destructive role in the control of serious bush fires.

Opponents of this view claim that vegetation management carried out over a long period or in the wrong season can lead to the decline of plant species which require either intense heat, such as that generated by fire, for seed expulsion and regeneration, or fire free winters for establishment. Control burning is usually carried out in autumn, before seeds are produced and therefore may hamper the chances of survival of such species.

The Environmental Planning and Assessment Act provides a system for these aspect to be properly assessed so that the overall interests of the community are best met. Where risk is high, development can be prevented altogether. If circumstances lead to allowing scope for development then the management of the environment and control on the development to minimise risk can be required under the Act.

DEVELOPMENT OF A BUSH FIRE MANAGEMENT STRATEGY

Conservationists, property owners and others have long been concerned that a fire management strategy is needed for bushland areas, but usually for different reasons.

Conservationists are concerned that without a strategy, random burning of areas for hazard reduction can, after a time, significantly affect the ecology of an area. Furthermore, their concerns include the opening up of fire trails which may lead to unwanted public intrusion into areas, and cause erosion. There is also concern that the permission of development on the rim of an area of valuable and fire prone bushland may lead to increased pressure for hazard reduction by means of clearing as well as off-season burning. On top of this of course, are the emergency measures such as the bulldozing of breaks which may be directed when fires are raging out of control and which can permanently disfigure natural areas.

Property owners near bushland would also like to be aware that plans or strategies are available for protection measures to be undertaken both for off-season control and for emergency situations. Their priorities usually are related more to the value to them of their properties rather than of preservation of the ecology of an area.

Responsible fire control officers naturally enough want to be sure that the areas within their administration are managed in such a way that the extremes with which they are confronted in emergency conditions are kept to a minimum to avoid loss of homes, property damage, and mostimportantly loss of life.

It is obvious, therefore, that from all points of view there are good reasons to have fire strategies developed for managing areas of fire prone bushland. It is also desirable that each of the groups mentioned has an input to the preparation of these strategies so that their respective needs can be met as far as is practicable. It is also obvious that compromises will be necessary. But for consideration by all concerned in their formulative stages, conflicts will continue to occur.

The answer, therefore, seems to be for those responsible for managing areas of ecologically valuable, but potentially dangerous fire prone bushland, to follow the framework contained in the Environmental Planning and Assessment legislation in the development of fire strategies, recognising that they are "activities" which are likely to significantly affect the environment. Indeed it would seem that they have a responsibility to do so.

In order to bring this about it is suggested that the authorities, usually Local Government but sometimes other Government Authorities such as National Parks and Wildlife Service, should come together at the outset to develop ongoing strategies to meet all anticipated circumstances, and make these strategies the subject of environmental impact statements. This would entail initial consultation with the Director in order to ascertain requirements. The public exhibition of these environmental impact statements would provide the opportunity for authorities, property owners and interested public to make their views known, so that they may be taken into account in the final determination of a strategy.

CO-ORDINATED PLANNING APPROACH

Finally, I would suggest that apart from the existing management programmes additional planning action could be taken by fire control officers, as well as local government planners, in the development of fire hazard maps along the lines set out in the draft circular referred to in this paper and more specifically described in the Rural Land Evaluation Manual published by the Department. This I would see as a valuable step in assessing the areas for particular management strategies and one which could then form part of any study to be used in the preparation of a local environmental plan or, in a more detailed way, in development control plans under the Act.

The first step, fundamental to any planning exercise, is therefore to gather information to understand the nature of the environment and the problem. But more importantly the initiative of fire control officers undertaking fire hazard mapping will ensure that a co-ordinated planning approach is adopted towards better planned fringe development.

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