

# Bushfire Mitigation Strategy

2019–2023





**Acknowledgement of traditional owners**  
Nillumbik Shire Council acknowledges the Wurundjeri people who are the Traditional Custodians of Land known today as Nillumbik. We pay respect to the Elders both past and present and extend that respect to other Indigenous Australians.

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# A Message from the Mayor

The Nillumbik Shire is an amazing place to live and raise a family. However with our unique lifestyle, nestled within the environment we love and choose to live in, we face the real threat and challenge of bushfire. We must understand these challenges, respect the threat and build plans and mitigation measures into our lives.

As Mayor, I have sponsored the development of this strategy and along with all Councillors, I'm proud to be delivering on our promise for a safe and healthy environment through a focus on emergency management and the implementation of the 2019-2023 Nillumbik Shire Bushfire Mitigation Strategy.

The strategy acknowledges that we cannot deal with bushfire alone. We must align this with other challenges we face including environmental management, encouraging biodiversity and protecting our community.

The overarching operating principle and strategic priority are very clear and are underpinned by the protection of human life.

The strategy supports the need to understand and achieve a balance between bushfire mitigation and the environment. It has focused on relationships with the community and all partner agencies to ensure a shared responsibility and shared obligation of the Nillumbik bushfire risk, and the importance of building resilience.

It is now time for us all to champion a balanced and proactive approach, as bushfire will continue to be a key challenge within our communities and across our Shire. Council will continue to support the community and all partner agencies to adopt this strategy through the monitoring and support of its implementation.



A handwritten signature in black ink, which appears to read "Karen Egan". The signature is written in a cursive, flowing style.

Cr Karen Egan  
**Mayor**



# A Message from the CEO

The Bushfire Mitigation Strategy is a key document developed by Council as part of the Shire's overall approach to emergency management. It has been developed with the significant expertise of the Nillumbik Shire community and other agencies and experts, considering environmental and biodiversity.

The strategy establishes a clear direction for Council that aims to improve community resilience by mitigating bushfire risk while enabling community members to live as safely as possible in what is recognised to be high risk locations. Importantly, the community has been at the centre of the strategy's development and this will continue in the implementation of the strategy.

The strategy is a proactive approach to bushfire mitigation. Its focus is on enhanced mitigation techniques, prevention strategies and improved preparedness for bushfire risk. The strategy adopts a broad set of strategic priorities including risk-based fuel management, as well as considering protection of the environment with the need to reduce fire risk overall. Community view and aspirations have played a key role in determining the focus of the strategy. It is important to note that it is not a strategy that considers response to, and recovery from, emergency events.

Bushfire mitigation in Nillumbik Shire is especially challenging with 91% of our Shire designated as Green Wedge and heavily vegetated. Therefore we must challenge ourselves to be well informed, with the latest know how to forge the most resilient community who will proactively lead, support and implement the strategy.

I commend the work of the community for their positive engagement with Council and its experts to produce this most important Bushfire Mitigation Strategy in serving the best interests of community safety and protection of the environment.



Carl Cowie  
**CEO**

# Executive Summary

Nillumbik Shire is one of the highest bushfire risk areas in the world. As such, Council has identified bushfire mitigation as a key Council priority.

There are unique challenges within Nillumbik Shire that make bushfire mitigation particularly complex. This includes its natural environment, its location on the urban fringe, proximity to national parks or river frontage with high fuel loads, its demographics including an ageing population, and the large proportion of privately-owned land.

The strategy identifies four strategic priorities, each with a series of associated objectives: reducing the number and impact of bushfire incidents; creating a community focused approach to bushfire; creating a coordinated approach between key agencies and the communities of Nillumbik; and ensuring strong advocacy.

It also identifies four operating principles for bushfire mitigation: protection of human life; balancing environmental protection with bushfire risk; shared responsibility; and reducing, managing and modifying fuels.

The strategic framework set out in this strategy will guide a *Bushfire Mitigation Implementation Plan*, which will appoint responsibility for actions that:

- mitigate bushfire risk
- reduce fuel loads
- increase safety
- fulfil legislative requirements
- promote best practice
- protect environmental assets and values
- empower community; and
- most of all, protect life and property.

Council will oversee this strategy and the associated *Bushfire Mitigation Implementation Plan* through its Municipal Fire Management Planning Committee (MFMP), which is a sub committee of the Municipal Emergency Management Planning Committee (MEMPC). These committees comprise of various agency representatives that have shared ownership and responsibility for the implementation of this strategy.

Like any strategy, this strategy cannot be considered in isolation. It has been developed and will be implemented in conjunction with Council's emergency management documents including but not limited to the *Nillumbik Emergency Management Future Directions Plan*<sup>1</sup> and the *Green Wedge Management Plan*.



# Introduction

**'Nillumbik Shire is one of the most bushfire prone municipalities in Victoria with a history of significant bushfires that have impacted communities, caused death and injury to humans and animals; caused significant destruction of property; displaced individuals and families from their homes and caused catastrophic impacts on wildlife and the natural environment.'**

**- Craig Lapsley, former Victorian Emergency Management Commissioner**



## **This Bushfire Mitigation Strategy 2019–2023 is a major commitment in the Council Plan 2017–2021. It highlights the significance of bushfire in the Nillumbik Shire and the need to improve the way we prevent, prepare for, respond to and recover from fire.**

The potential for bushfire to impact our lives cannot be underestimated. It has the potential to kill, injure and change our lives forever. Therefore primacy of life must be paramount for us all.

Nillumbik Shire consists of connected, knowledgeable and caring communities that live in a wonderful rural setting adjacent to suburbia. It enjoys a very stable population and a community that is committed to environmental sustainability. The people of Nillumbik generally understand the risk and threat of bushfire, and fear what it can do to their lives, their community and the place they love and live.

As history has taught us, under certain conditions bushfire can travel quickly through the landscape, causing considerable devastation. Refer to the appendix map to view the history of bushfire occurrences across the Shire since 1927 (refer to page 26, map 4). The Shire landscape contains vegetation and terrain that allow fire to move with speed, with the potential for death and destruction. This is why the community has significant concern and rightfully demands a comprehensive mitigation strategy that respects their values and delivers improved safety.

Our community is reasonably well-informed about their rights and obligations in relation to local issues, including bushfire risk. They generally take responsibility for bushfire safety, but also hold others accountable. This highlights the importance of shared responsibility: we must collectively commit to mitigating, preparing for, responding to and recovering from bushfire.

This strategy guides the next steps in minimising the threat and impacts of bushfire in an area with significant bushfire history. It aims to achieve consistent and effective fire risk mitigation planning and practices through community engagement and a commitment to agency collaboration. This includes knowledge-sharing, and an increase in proactive bushfire related learning and behavior change.

This strategy will have a high profile to ensure that bushfire mitigation is a shared responsibility and shared obligation between Council, the community, businesses, agencies, organisations and other levels of government.



**‘The recommendations we make give priority to protecting human life, and they are designed to reflect the shared responsibility that governments, fire agencies, communities and individuals have for minimising the prospect of a tragedy of this scale ever happening again.’**

**- 2009 Victorian Bushfires  
Royal Commission**



# Nilumbik Shire—profile and partnerships

Nilumbik Shire Council is an interface municipality located 25kms north-east of Melbourne's CBD. It has a population of approximately 64,000 residents and a land area of 43,200 hectares.

It is characterised by a high proportion of privately-owned land coupled with low population density and growth.

The minimal population growth rate of Nilumbik Shire can be attributed to an aging population, stringent state and local government planning laws, minimal high-density housing, and large privately-owned properties.

The majority of the shire is known as the 'Green Wedge' which is home to approximately 13,000 people.

With such a high proportion of private land, a significant portion of which is surrounded by public land (forested areas) and river frontage, it is imperative that Council and agencies work collaboratively with landowners to reduce fire risk. Planning restrictions such as the Bushfire Management Overlay (BMO) (refer to page 24, map 2) and the Environmental Significance Overlay (ESO) (refer to page 25, map 3) limit what landowners can do on their land to reduce fire risk.

Living in Nilumbik provides a unique rural lifestyle and experience with central Melbourne attractions and employment only a short distance away. However, the characteristics that make Nilumbik so liveable also contribute to it being one of the most bushfire prone areas in the world. Furthermore, bushfire risk is not confined to the Shire area, as neighbouring municipalities also have similar bushfire risk profiles (refer to page 23, map 1).

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 shared obligation 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.

To emphasise the importance the community places on bushfire mitigation and emergency management, the *2019 Nilumbik Shire Annual Community Survey* shows about one-sixth (14.4%) of survey respondents identified bushfire management and prevention as an issue for Council to address, which was rated second of the top five issues. The survey also identified bushfire and emergency management satisfaction level being 7.09 out of 10, a level of satisfaction categorised as "good".



# Historical management of bushfires

Part of the area north of the Yarra River, which is now identified as the Nillumbik local government area, is home to the Wurundjeri people.

Prior to European contact, the Wurundjeri people managed their landscape using techniques now identified as swidden agriculture or rotational farming. This meant the land was cleared using the 'FireStick' method (cool burns) and then left to regenerate for seasons before being farmed again. By using these 'slash and burn' methods to manage the land, the Wurundjeri were able to reduce fuel loads, which resulted in bushfires burning with less ferocity and intensity.

Bushfire occurred naturally within this landscape, such as by lightning strike. Many of the plants and animals found on Wurundjeri land have evolved to survive fire events, and are reliant on bushfire to regenerate. For centuries humans have actively used fire as a land management tool.

We can learn from this historical practice in the way that we manage future bushfire risk in the landscape. The 'FireStick' method of cool burning has a lower impact on life, animals, habitat and landscape than an unplanned, high intensity bushfire, which has the potential to harm humans and animals and destroy property and the environment.



*Image: eucalyptus resprouting after fire*

# Council's role and policy context

Bushfire mitigation is a key responsibility for agencies, with legislation providing accountabilities for Nillumbik Shire Council, the Country Fire Authority (CFA), Department of Environment, Land, Water and Planning (DELWP), Parks Victoria, Melbourne Water, Victoria Police, VicRoads and private landowners.

Council has a number of legislated responsibilities relating to bushfire mitigation, prevention, response, relief and recovery. These activities are supported by a shared responsibility approach that includes the community, business and other levels of government.

Council must have an adequate emergency plan to help mitigate the social, economic and environmental impacts of bushfire in Nillumbik, not to mention communities in surrounding municipalities.

This is not just a moral responsibility, it is a legislated part of Council's role under the *Country Fire Authority Act 1958*, the *Emergency Management Act 2013*, and the *Emergency Management Legislation Amendment Act 2018*.<sup>2</sup>

The 2009 Victorian Black Saturday bushfires have left a significant scar in the community and across the landscape, which has resulted in a new approach to bushfire management and include:

- *Victoria State Emergency Management Priorities*<sup>3</sup>
- *Victorian Bushfire Strategy—Leave and Live approach*<sup>4</sup>
- *Community Resilience framework for Emergency Management*<sup>5</sup>
- *Emergency Management Diversity and Inclusion framework*<sup>6</sup>
- *The national Fire Danger Rating system*
- *Australia Bushfire Policy—'Prepare, Stay and Defend or Leave Early'*.

These policies are supported by new technologies and information systems that help community members make better informed decisions about their safety.



# Challenges



**A unique set of social, economic, environmental and technological challenges within Nillumbik Shire make bushfire mitigation particularly complex.**

The community	Challenges
Ageing population	<p>Nillumbik population data profiles<sup>7</sup> indicate that 35.8% of residents are aged over 50 with a higher percentage of retirees, older workers and pre-retirees (50 to 59), seniors and elderly than in Melbourne.</p> <p>This requires consideration and strategies that support an older more mature population utilising their knowledge and experience to support community bushfire mitigation.</p>
Extent of privately-owned land	<p>The high level of private land ownership in the shire, with the majority of private land in the designated Bushfire Prone Area (see page 21) poses significant challenge in reducing fire risk.</p> <p>Landowners have a responsibility to minimise risk to their own property and surrounding properties.</p> <p>Council also needs to work with other agencies to ensure the community is informed about the potential risks of bushfire and the threat of living in a bushfire risk location.</p>
'Lifestyle' change	<p>In the future an increasing number of people may move to larger properties for a 'lifestyle change'. 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.</p>
CFA	<p>A continued effort to maintain strong ties between the community and the CFA is vital during all stages of bushfire management. Community supported and viable CFA volunteer fire brigades are essential.</p>
Community expectations from Council	<p>The community expects a higher level of efficiency, transparency and accountability from Council in relation to bushfire management. In response, Council needs to strengthen and streamline its processes and increase its level of engagement with the community.</p>
Changes to traditional forms of information gathering	<p>During an emergency, online communication channels such as social media offer an immediacy of information that traditional media such as newspapers and television cannot.</p> <p>Council and other agencies need to use these communication channels to provide a primary news source to enable households to be better informed in preparing and enacting their fire survival plans. It remains critical to remember the importance of face-to-face conversations and ongoing information sharing.</p>
Community concerns about bushfire	<p>Living in a bushfire area can be challenging for households. There is a heightened concern for safety, which is sometimes displayed as fear. Trauma from previous bushfires, in particular Black Saturday, can feed into this fear and affect people's decisions and behaviour.</p> <p>Therefore, strategies that prevent, mitigate and manage bushfire must be supplemented by programs that build community resilience and wellbeing.</p>



<b>The environment</b>	<b>Challenges</b>
<b>Climate change</b>	The effects of climate change will increase the intensity and frequency of bushfires.
<b>Rural / urban interface</b>	Nillumbik's 'urban' residential area is predominantly in the southern part of the shire, at the interface with metropolitan Melbourne. High fuel loads near this interface pose a risk of bushfires created by embers travelling into the highly populated urban areas.
<b>Fuel load reduction and biodiversity</b>	Fuel load reduction targets on public land including Council land need to be met while also ensuring the region's biodiversity remains intact - something which is highly valued by the community.
<b>The economy</b>	<b>Challenges</b>
<b>Business</b>	Businesses need to be considered when implementing bushfire mitigation and emergency management plans. Business continuity is essential to reducing economic and social impacts: the sooner business can resume after a bushfire, the sooner business owners can regain their livelihoods and communities can feel a sense of normality return.
<b>Agriculture</b>	Working with large agricultural landowners is critical to mitigating bushfire risk.
<b>Visitors and tourism</b>	Communication with visitors to the region, particularly those unfamiliar with the area, should be carefully planned in the lead up to the bushfire season. Visitors need to be informed about the actions they need to take in the event of a bushfire. An increased emphasis on the rebuilding process after a bushfire event also encourages visitors back to the area to support the local economy.
<b>Technology and infrastructure</b>	<b>Challenges</b>
<b>Mobile phone black spots</b>	Mobile phone black spots continue to pose a significant risk in areas of a high bushfire risk.

# Strategy





# Strategic priorities

## Four strategic priorities shape the Bushfire Mitigation Strategy:

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

Improve bushfire mitigation across the municipality through improved prevention, planning and preparedness.

### 2. Creating a community focussed approach to bushfire

Create and implement a range of effective communication and community engagement 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.

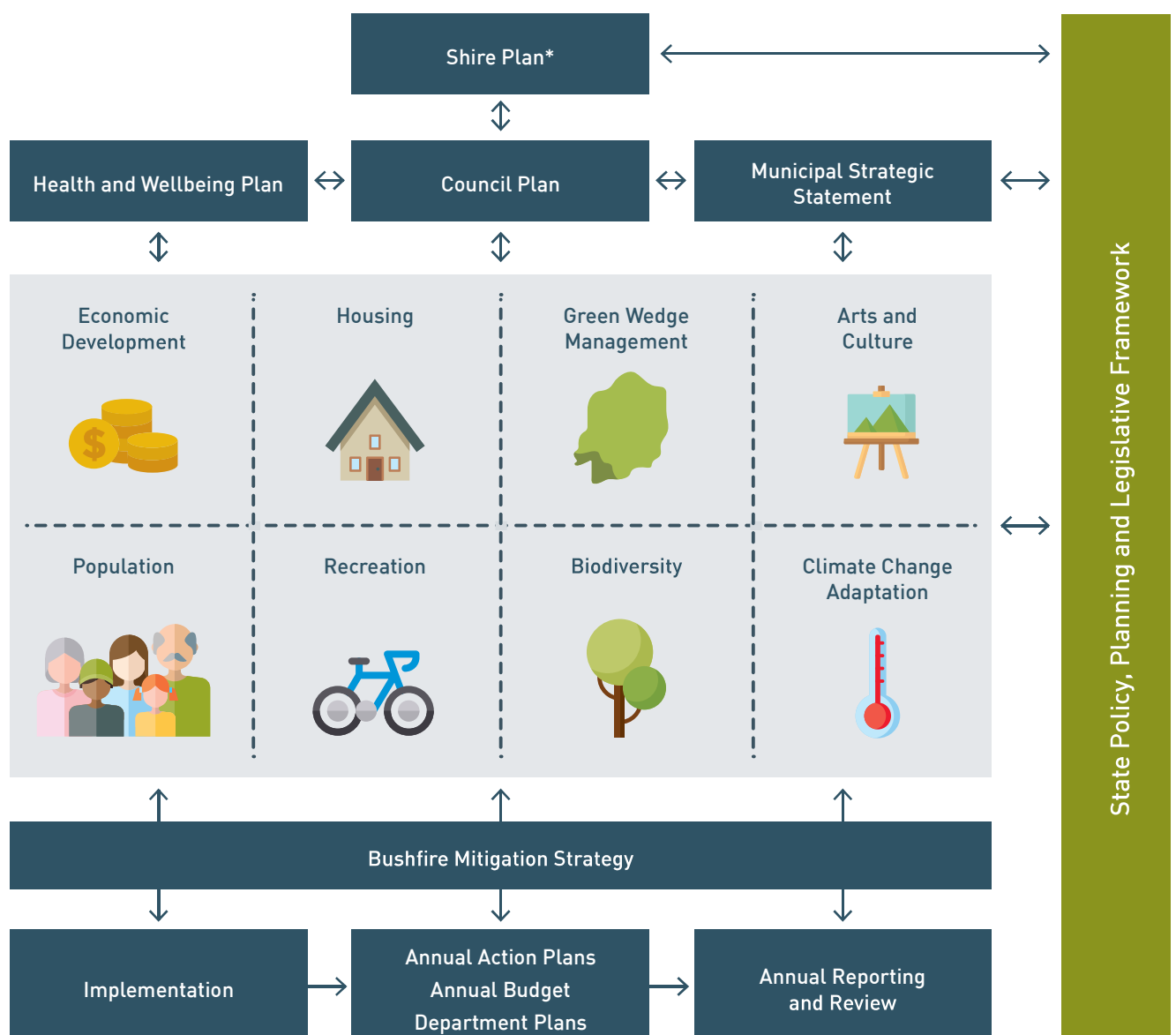
### 3. Creating a coordinated approach between key agencies and the community

Clearly define roles and responsibilities to ensure strong and mutually beneficial relationships are fostered and maintained with all agencies during all stages of bushfire management.

### 4. Ensuring strong advocacy

The Shire will advocate on behalf of the community to all levels of government to ensure a strong position in relation to bushfire and bushfire risk.

The *Bushfire Mitigation Implementation Plan*, managed by the MFMPC is designed to deliver tangible outcomes to improve bushfire safety for each of these strategic priorities.



\*Under development or review

# Operating principles

The following operating principles will guide Council's frameworks, plans and actions around risk management and bushfire mitigation within the Shire:



**1** Protection of human life



**2** Balancing bushfire risk mitigation with environment protection



**3** Shared responsibility, shared obligation and strong community connection



**4** Reducing, managing and modifying fuels

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## 1. Protection of human life

Council's key operating principle will be, first and foremost, the protection of human life. This includes members of the community who are in immediate danger, but also the broader community and personnel of all associated agencies.

## 2. Balancing bushfire risk mitigation with environment protection

Council will work to strike a balance between working to mitigate and reduce the threat of bushfire, the impact on private property and businesses and protecting the environment, including the shire's unique flora and fauna.

## 3. Shared responsibility, shared obligation and strong community connection

To succeed in emergency management, the community must be willing to work with Council and associated agencies. The key focus is to establish and maintain shared responsibilities, shared obligation and being community centric. This will be achieved by using proven community engagement principles and learning from and responding to the needs of the community where feasible. Applying shared responsibilities, shared obligation principles and being community centric and connected is a responsibility of agencies, government departments, Council, private landowners and community groups.

## 4. Reducing, managing and modifying fuels

Fire intensity is well researched and a key element of fire behavior that determines the type of fire experienced. When a bushfire has a high fire intensity it will be unpredictable, difficult to control, and will cause significant damage that has the potential to cause death and destruction.

Fire intensity can be reduced by modifying fuel density and fuel configuration. A holistic approach is needed to reduce fuel taking into account the combination of private and public land in the Shire:

- private land that has significant fuel vegetation
- Council-owned and managed reserves
- private roads and roads that are owned and managed by the state or Council
- state-owned and managed national parks, forests and bushland
- grasslands
- river frontage bush areas.

These private and public parcels of land are managed separately however they must be considered together to identify the best mitigation and prevention treatments for reducing fuel.

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.



# Objectives



**Each strategic priority outlined in the table below has been allocated high-level objectives that will guide the three-year *Bushfire Mitigation Implementation Plan*.**

Council will oversee this plan through the MFMPC. The MFMPC will develop and implement this plan with the support of Council management and community engagement. The plan will appoint responsibility for actions to increase safety, promote best practice, fulfil legislative requirements, and balance these factors with environmental assets and values, and most of all, protect life and property.

The four strategic priorities will be implemented in conjunction with Council’s emergency management documents including the *Nillumbik Emergency Management Future Directions Plan* and the *Green Wedge Management Plan* and the State emergency management documents. The strategies, issues and approaches in these documents will inform and align with each another.

Strategic Priorities	Goals
<p><b>1. Reduce the number and impact of bushfire incidents</b></p>	<ul style="list-style-type: none"> <li>1.1. Reduce the number of bushfire ignitions by developing a program to prevent arson in Nillumbik and in areas that may affect Nillumbik, and reduce reckless behaviour that starts bushfires.</li> <li>1.2. Support Nillumbik’s Electric Line Clearance program to reduce the number of bushfires caused by electric lines in urban areas.</li> <li>1.3. Strengthen the annual roadside slashing, box clearance, woody weeds removal on roads identified in the MFMP, and maintain a hazardous tree removal program.</li> <li>1.4. Nillumbik Shire to be a ‘role model’ by providing best practice fuel risk reduction on land they own or manage.</li> <li>1.5. Establish and maintain an active indigenous burns program to reduce fuel on private and public land.</li> <li>1.6. Establish a rolling three year fuel reduction plan and an annual multi-agency works program to reduce bushfire risk that aligns with Nillumbik’s MFMP.</li> <li>1.7. Create an annual fuel reduction program on private property to enable households and community groups to carry out strategic fuel reduction and complete bushfire risk mitigation measures that is supported by the provision and promotion of the 10/30 and 10/50 exemptions, and the provision of improved green waste collection during the Fire Danger Period.</li> <li>1.8. Broaden the membership and range of activities of the MFMPC.</li> <li>1.9. Maintain, manage and enhance the network of static water tanks and fire access tracks.</li> <li>1.10. Promote the establishment of improved road access and egress and the installation of passing bays.</li> <li>1.11. Maintain, and conduct a needs analysis of Neighbourhood Safer Places (Bushfire Places of Last Resort) and consider the establishment of Community Fire Refuges.</li> </ul>



Strategic Priorities	Goals
<p><b>2. Creating a community focussed approach to bushfire</b></p>	<ul style="list-style-type: none"> <li>2.1. Implement an annual program, facilitated by Nillumbik and involving all agencies, that raises bushfire risk awareness for households; community groups; and the business, commerce, education and health sectors.</li> <li>2.2. Support the enhancement of CFA's Community Fireguard program.</li> <li>2.3. Conduct a Community Values Forum to capture and describe the main reasons people live in Nillumbik and what is valued and important to them. The outcomes will support Council decision making and underpin future bushfire plans and actions.</li> <li>2.4. Develop a suite of fire intensity tools and engage with the community on the link between fuel reduction and fire intensity.</li> <li>2.5. Develop a suite of environmental tools, and engage with the community on environmental values, fuel management (including weeds) and methods to protect the environment and achieve improved fire mitigation and environmental outcomes.</li> <li>2.6. Develop Community Emergency / Bushfire Plans for communities of St Andrews, Strathewen, Panton Hill, Hurstbridge, Christmas Hills, Smiths Gully and others, taking into account the 2018 Emergency Management legislation and the <i>Community Based Emergency Management</i> framework.</li> <li>2.7. Develop a dynamic annual consultation and communications plan that includes all mediums and modes of communication to reach the entire community before, during and after an emergency.</li> <li>2.8. Facilitate the development and provision of a content framework and a suite of tools for households; community groups; and the business, commerce, education and health sectors to support them to prepare for bushfires, and make good decisions to protect their lives, pets, animals and assets.</li> <li>2.9. Coordinate a community Emergency Management Volunteer Development and Resilience Program that assists the Shire through emergency management agencies and volunteer organisations. Facilitate an annual emergency management volunteer development and resilience program to foster a diverse, inclusive, well lead and agile volunteer workforce that assists the Shire and emergency management agencies.</li> </ul>

Strategic Priorities	Goals
<p><b>3. Creating a coordinated approach between key agencies and the communities of Nillumbik</b></p>	<ul style="list-style-type: none"> <li>3.1. Work with agencies to develop Incident Management Plans.</li> <li>3.2. All agency plans are consistent and aligned to the MEMP.</li> <li>3.3. Continue to externally audit the MFMP to ensure it is compliant with legislative requirements.</li> <li>3.4. Develop with agencies an annual Communications Plan describing strategies and approaches to reach the entire community before, during and after an emergency.</li> <li>3.5. Participation at MEMPC and MFMP be a priority and the representative be able to lead, contribute and commit to the issues being discussed.</li> <li>3.6. Council will continue to lead the facilitation of fire and emergency management planning at the municipal and local level.</li> <li>3.7. Evaluate, assess and update any agreements for the provision of mutual aid established between key partners including neighbouring municipalities and regional agencies.</li> </ul>
<p><b>4. Ensuring strong advocacy</b></p>	<ul style="list-style-type: none"> <li>4.1. Actively advocate to ensure legislation, policy and infrastructure investment meets the needs of the community.</li> <li>4.2. Seek increased government and industry funding for the removal of mobile phone black spots.</li> <li>4.3. Support and facilitate the provision of resources to enable private property to assess and manage fuel.</li> <li>4.4. Create evidence based approaches based on performance reporting and an assessment of bushfire prevention and mitigation programs to assist understanding of short, medium and long term outcomes.</li> </ul>



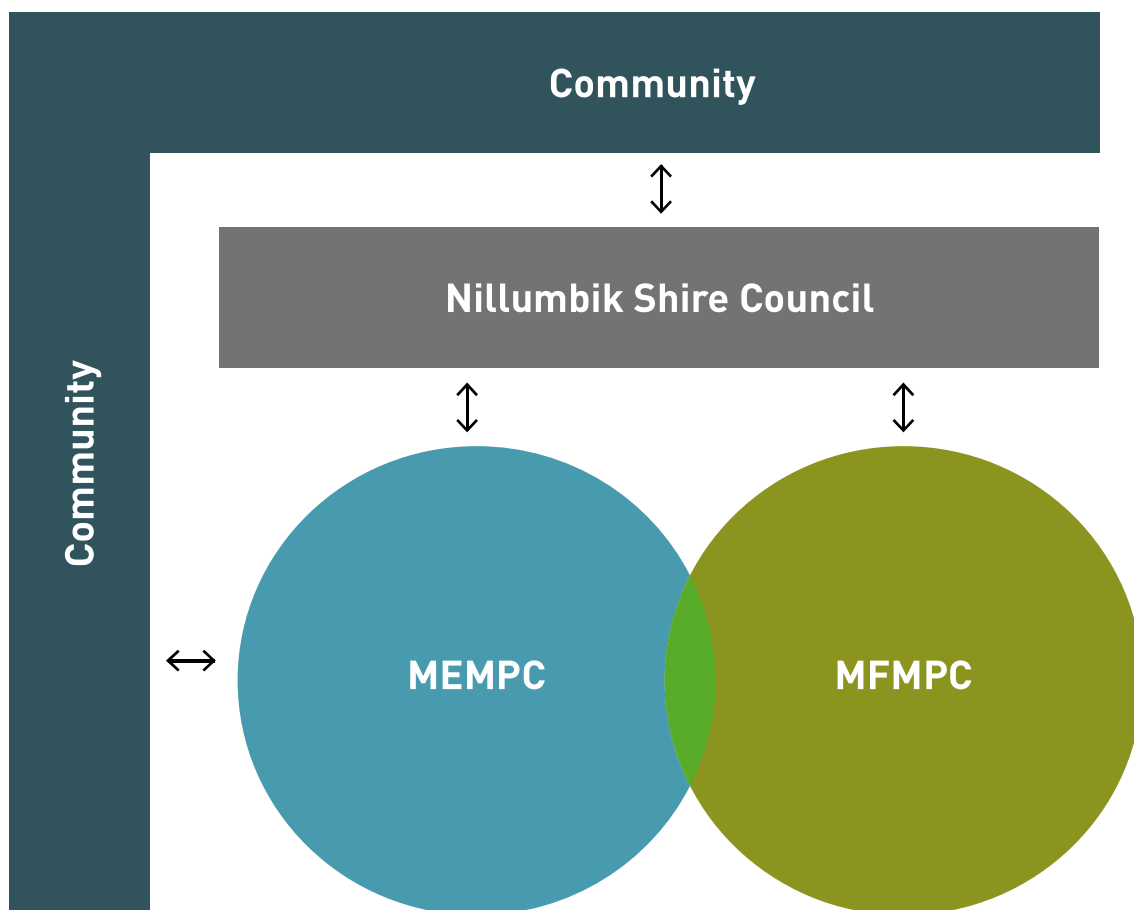
# Monitoring, Reporting and Improvements



## Council will oversee this plan through the MFMPC.

The MFMPC will develop and implement the plan with the support of Council. The implementation plan will appoint responsibility for actions and MFMPC will be responsible for measuring performance. The MFMPC will report quarterly to the MEMPC on its progress towards implementing the strategy.

The MFMPC will review its performance every six months and identify opportunities for improvement. The improvement opportunities will be documented in an improvement action plan and reported to MEMPC.





# Definitions

## **Bushfire Management Overlay**

applies to areas identified as having high bushfire hazard. Together with the planning requirements for bushfire protection in Clause 52.47, this overlay controls development in order to mitigate risk to life, property and community infrastructure. Planning Practice Note 64 – Local Planning for bushfire Protection explains the use of this overlay in more detail (refer to map 2).<sup>8</sup>

## **Bushfire mitigation**

describes activities to reduce the severity and impact of bushfires. It recognises that while not all bushfires can be prevented, effective planning and preparation can minimise the consequences of these events.

## **Bushfire Prone Areas**

are areas that are subject to or likely to be subject to bushfires. The Minister for Planning has determined that specific areas are designated Bushfire Prone Areas for the purposes of the building control system.

## **Bushfire Protection: Exemptions (“10/30 and 10/50 rules”)**

Following recommendations by the *2009 Victorian Bushfires Royal Commission*, the Victorian State Government introduced changes to the Victorian Planning Provisions. The changes enable landowners to clear fuel to create defensible space, around buildings used for accommodation, as well as along existing fence lines.

Coming into effect in November 2011, they were revised in 2014 and in 2018.<sup>9</sup> The provisions allow property owners, in specified locations, to clear fuel (including trees) without the need to obtain a planning permit from local council.

## **Environment Significance Overlay**

is a planning control and is an overlay concerned with ensuring that the development of land does not affect identified environmental values and qualities of particular areas within the Shire.

## **Green Wedge**

land is defined under the *Planning and Environment Act 1987* as land outside an Urban Growth Boundary as described in the metropolitan fringe planning scheme.<sup>10</sup>

## **Municipal Emergency Management Planning Committee (MEMPC)**

is a committee established by Council, consistent with legislation. Membership of the MEMPC includes representatives from local emergency service organisations, relief and recovery agencies, local health services and utilities as well as relevant State government departments. The MEMPC facilitates planning, preparedness, operational coordination and community participation for the prevention of, response to and recovery from an emergency event.

## **Municipal Fire Management Planning Committee (MFMP)**

is a subcommittee of the Nillumbik Municipal Emergency Management Planning Committee (MEMPC) and is responsible for the development of a Municipal Fire Management Plan to meet the requirements for a Municipal Fire Prevention Plan under the *Country Fire Authority Act 1958*.

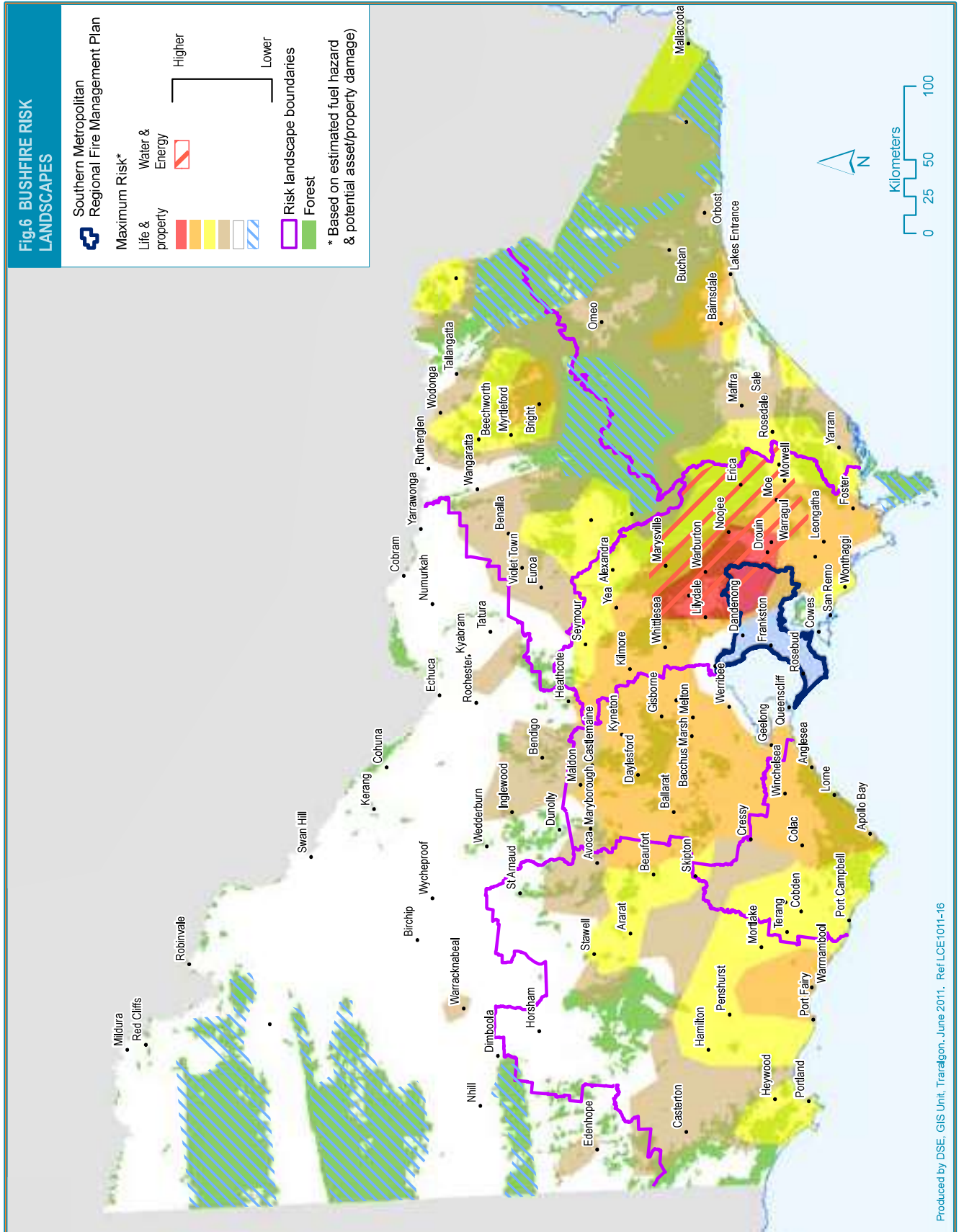
# References

## Footnote links

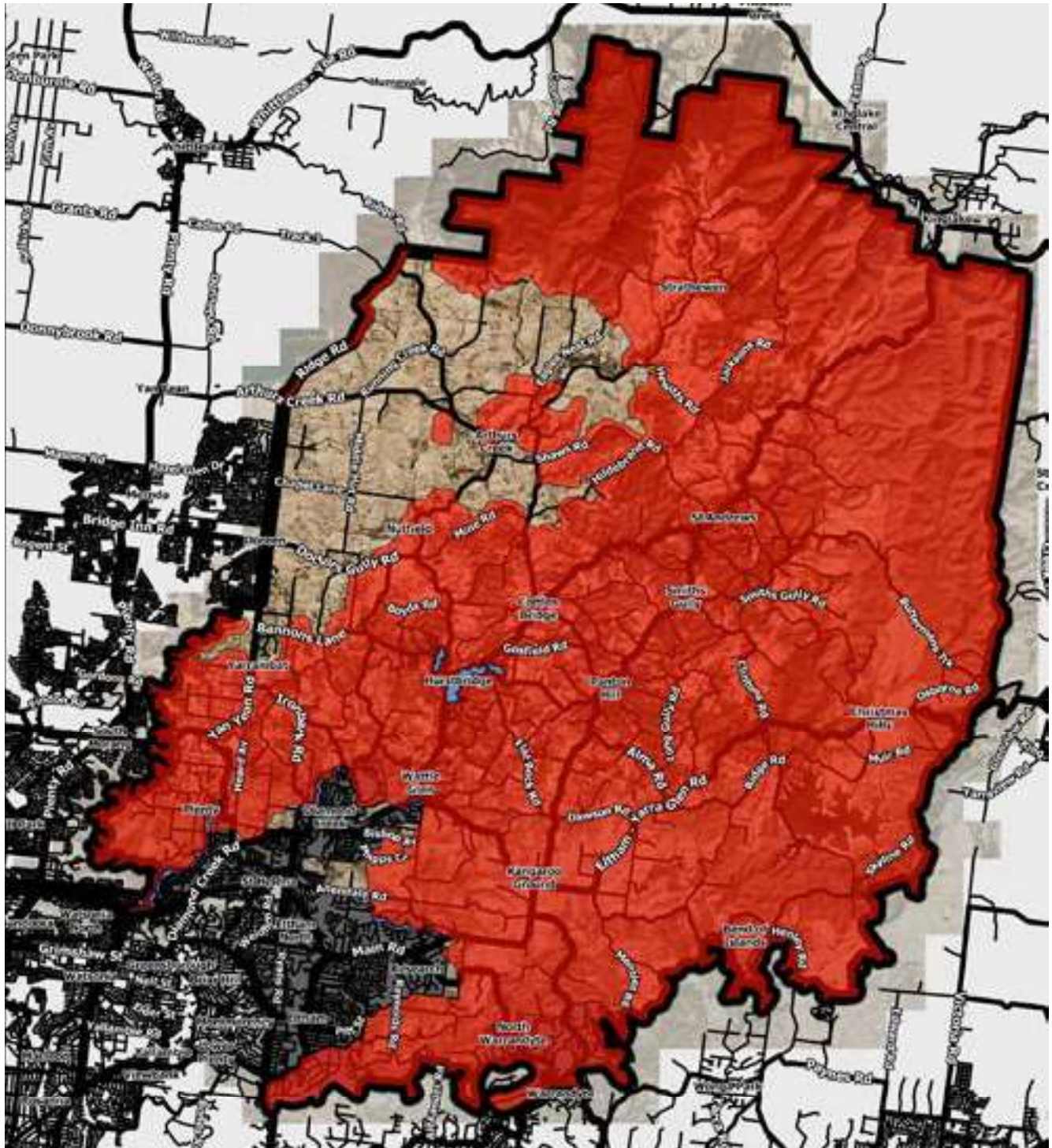
1. ***Nillumbik Emergency Management Future Directions Plan***  
[www.nillumbik.vic.gov.au/emeg](http://www.nillumbik.vic.gov.au/emeg)
2. ***Emergency Management Legislation Amendment Act 2018***  
[http://www.legislation.vic.gov.au/Domino/Web\\_Notes/LDMS/PubStatbook.nsf/51dea49770555ea6ca256da4001b90cd/857F6CE338E5719ECA2582F0000DFBC9/\\$FILE/18-036aa%20authorised.pdf](http://www.legislation.vic.gov.au/Domino/Web_Notes/LDMS/PubStatbook.nsf/51dea49770555ea6ca256da4001b90cd/857F6CE338E5719ECA2582F0000DFBC9/$FILE/18-036aa%20authorised.pdf)
3. ***Victoria State Emergency Management Priorities***  
<https://www.emv.vic.gov.au/StateStrategicControlPriorities>
4. ***Victorian Bushfire Strategy—Leave and Live approach***  
<https://www.emv.vic.gov.au/news/leave-and-live>
5. ***Community Resilience framework for Emergency Management***  
[https://files-em.em.vic.gov.au/public/EMV-web/Community\\_Resilience%20\\_Framework.pdf](https://files-em.em.vic.gov.au/public/EMV-web/Community_Resilience%20_Framework.pdf)
6. ***Emergency Management Diversity and Inclusion framework***  
<https://files-em.em.vic.gov.au/public/EMV-web/Emergency-Management-Diversity-and-Inclusion-Framework.pdf>
7. ***Nillumbik population data profiles***  
<https://profile.id.com.au/nillumbik/service-age-groups>
8. ***Planning Practice Note 64 – Local Planning for bushfire Protection***  
[http://planningschemes.dpcd.vic.gov.au/schemes/vpps/52\\_12.pdf](http://planningschemes.dpcd.vic.gov.au/schemes/vpps/52_12.pdf)
9. ***Victorian Planning Provisions***  
[https://www.planning.vic.gov.au/\\_\\_data/assets/pdf\\_file/0026/94535/1\\_Planning-Schemes.pdf](https://www.planning.vic.gov.au/__data/assets/pdf_file/0026/94535/1_Planning-Schemes.pdf)
10. ***Green Wedge Planning Provisions***  
[https://www.planning.vic.gov.au/\\_\\_data/assets/pdf\\_file/0017/13463/PPN62-Green-Wedge-Planning-Provisions\\_June-2015.pdf](https://www.planning.vic.gov.au/__data/assets/pdf_file/0017/13463/PPN62-Green-Wedge-Planning-Provisions_June-2015.pdf)



# Map 1: Bushfire Risk Landscapes



## Map 2: Bushfire Management Overlay (BM0)



### Bushfire Management Overlay

- BM0
- BM01

### Roadways

- Freeway
- Highway
- Arterial
- Sub Arterial
- Collector
- Local

Source: DELWP

### Green Wedge status

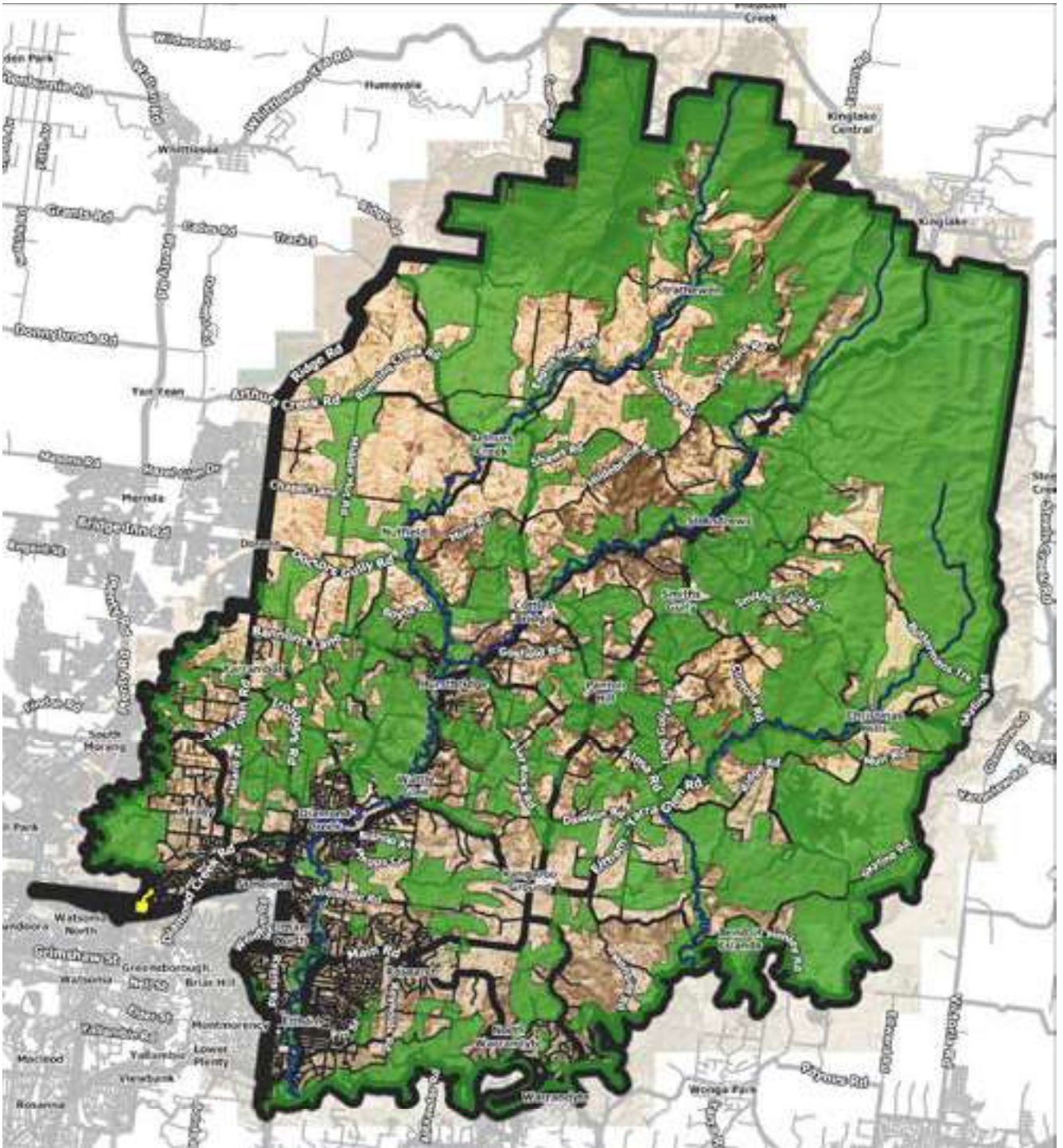
- Reservoirs

### Administrative boundaries

- Nillumbik Shire Boundary



### Map 3: Bushfire Environment Significance Overlay



**Environmental Significance Overlay**

- ES01
- ES03
- ES04

**Roadways**

- Freeway
- Highway
- Arterial
- Sub Arterial
- Collector
- Local

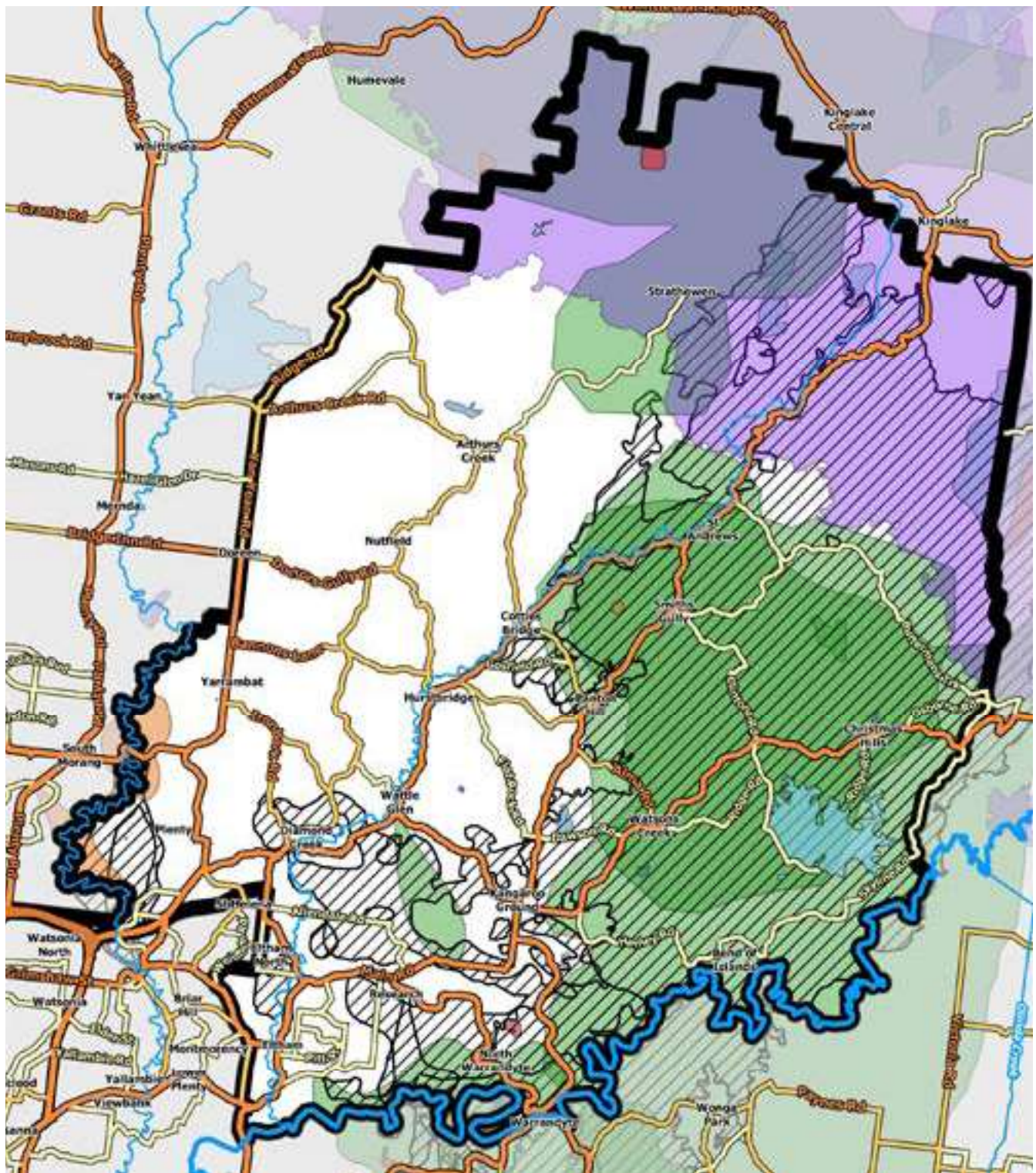
**Administrative boundaries**

- Nillumbik Shire Boundary

Source: DELWP



# Map 4: Bushfire Occurrence



- Bushfire Occurrence**
- Year 1927–1950
  - Year 1951–1960
  - Year 1961–1970
  - Year 1971–1980
  - Year 1981–1990
  - Year 1991–2000
  - Year 2001–2010
  - Year 2011–2016

- Administrative boundaries**
- Nillumbik Shire Boundary

- Watercourse**
- Hierarchy: High
  - Hierarchy: Medium

- Major water bodies**
- Reservoirs

- Roadways**
- Freeway
  - Highway
  - Arterial
  - Sub Arterial
  - Collector

Source: DELWP





## **Nillumbik Shire Council**

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Submission No	Name	Summary	Officer Response
1	Narelle Campbell	<ul style="list-style-type: none"> <li>• The “mitigate risk and reduce fuel loads” language is very welcome and would benefit from repetition.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• The intent presented has been included either in the strategy or the implementation plan with modification and inclusion of themes and words.</li> <li>• All partner agencies including Melbourne Water and Vic Roads have been included in the strategy and implementation plan.</li> <li>• Planning and settlement issues will be dealt with separate to the BMS.</li> <li>• Partnerships and relationships are fundamental to the future success and underpin the BMS.</li> </ul>

2	Warwick Leeson OAM	<ul style="list-style-type: none"> <li>• Bushfire Mitigation Strategy needs to be considered as an interactive part of Climate Change and Council's Green Wedge Management Plan it needs to contain not just evidence-based information but, also, explanatory implementation I suggest this BMS draws on proven models and I would highlight the 'Be Ready Warrandyte' Project as a starting point.</li> <li>• 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.</li> <li>• Just because people are older/retired, does not mean that that they are necessarily more vulnerable; worthy of strong consideration is that of 'cool burns', as was practiced by the first Australians from time immemorial.</li> <li>• 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.</li> <li>• Such a collaborative approach with Landcare Groups It is worth noting that current 'controlled burns' are clearly not meeting the targets set highlights the importance of '<b>shared responsibility</b>' and should, I believe, besides placing strong emphasis on shared obligation, highlight the 'personal responsibility' aspect.</li> <li>• My suggestion would be that Council strongly advocate:</li> <li>• that there be no exemptions from prosecution for people lighting or causing fires during fire restriction periods, and</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan.</li> <li>• The BMS and implementation plan will build from the success of many community focused programs including 'Be Ready Warrandyte'.</li> <li>• The issue related to aged being vulnerable has be rewritten to address the issue presented.</li> <li>• Comments surrounding cool burning will be addressed by the implementation plan along with shared responsibility and engaging established trusted networks ie Landcare.</li> <li>• Arson management has been left with Victoria Police.</li> <li>• Implementation plan will seek agency data to report on all bushfire mitigation approaches and programs via the MFMPC and MEMPC to focus on key themes and performance reporting.</li> </ul>
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has the same indiscriminate and random capacity to kill, traumatise and destroy as any other act of terrorism.

- The recent VicRoads' installation of continuous roadside barriers along both the Kangaroo Ground- St Andrews & Kangaroo Ground-Yarra Glen Roads, has significantly limited road access and egress, by emergency services vehicles, in that the provided passing and pullover bays are not designed with bushfire and/or other emergency service vehicles requirements in mind. I would prefer to see greater emphasis on the Leave Early message.

Submission No	Name	Summary	Officer Response
3	Anonymous	<ul style="list-style-type: none"> <li>• Any statements should evidence based.</li> <li>• The strategy should include statements of fact and consider actual risk based on likelihood and consequence measured against a criteria.</li> <li>• The removal of vegetation is not necessarily the answer it does however need management and some removal may be appropriate.</li> <li>• An actual review of data on the causes of fires in Nillumbik should be undertaken.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• The Victorian State Bushfire risk map clearly indicates Nillumbik Shire is one of the higher bushfire risk areas within Victoria.</li> <li>• Evidence based information will be provided to assist better informed decisions by the community and the agencies.</li> <li>• Arson management has been left with Victoria Police.</li> <li>• Implementation plan will seek agency data to report on all bushfire mitigation approaches and programs via the MFMPC and MEMPC to focus on key themes and performance reporting.</li> </ul>

Submission No	Name	Summary	Officer Response
4	Eltham Community Action Group	<ul style="list-style-type: none"> <li>• Have a more deleterious effect on biodiversity than a cool bushfire? Obviously extreme/hot bushfires are a totally different proposition.</li> <li>• Biodiversity is declining in Nillumbik at an alarming rate, as it is in Australia and worldwide.</li> <li>• <i>most species loss comes from practices such as grazing, tree clearing and fire protection on private land</i></li> <li>• 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 to discuss this issue further with Council officers as well as the State Government. Discussion and investigation to see if it is possible to amend bushfire legislation to exclude urban areas in Nillumbik from current bushfire planning controls.</li> <li>• 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. Arial photography comparisons over the last 10 years will easily demonstrate our concerns.</li> </ul>	<ul style="list-style-type: none"> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan with an aim to achieve a strong balance between bushfire mitigation and environment protection.</li> </ul>



Submission No	Name	Summary	Officer Response
5	Nan Oates	<ul style="list-style-type: none"> <li>• Emphasis on shared responsibility between the Nillumbik Shire Council and the community, Interpretation of language “Leave or Live approach” this is open to variables</li> <li>• Any community engagement approach should include information on how to assess the fire risks on one’s own property Residents need to recognise that fire, the environment and our local climate are inextricably linked.</li> <li>• 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.</li> <li>• Integrating this Bushfire Mitigation Strategy with Nillumbik’s Green Wedge Management Plan is a vital component of these Operating Principles.</li> </ul>	<ul style="list-style-type: none"> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthened by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan acknowledges the aware, informed and knowledgeable community members and highlights the need for different community connection approaches.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan.</li> </ul>

6	Colleen Hackett	<ul style="list-style-type: none"> <li>• This is a strategy for days of high, very high or severe fire danger.</li> <li>• Furthermore, the concept of a “defendable space” must be clarified as this is far from clear. We avoid over dramatisation 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”.</li> <li>• Clear recognition that Climate Change is creating more complex conditions with fewer opportunities for the sorts of burning regimes we have hitherto depended upon 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”?</li> <li>• 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.</li> <li>• A recent survey found that 69 per cent 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.</li> <li>• A weed control program is the first step towards bushfire mitigation in many parts of the Green Wedge.</li> <li>• The protection of human life must be prioritised.</li> <li>• 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,</li> </ul>	<ul style="list-style-type: none"> <li>• Primacy of life is the overarching theme of the BMS.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan.</li> <li>• The BMS acknowledges the levels of FDR and is focused on the mitigation, prevention and preparedness and does not attempt to manage the response nor recovery phases of a bushfire.</li> <li>• Asset Protection Zones are Defendable space treatments that continue to be promoted for individual property protection.</li> <li>• The Victorian State Bushfire risk map clearly indicates Nillumbik Shire is one of the higher bushfire risk areas within Victoria.</li> <li>• The BMS is underpinned by developing and utilising strong partnerships and relationships which are fundamental to the future success and extends to the balanced approach to bushfire mitigation and environmental protection.</li> <li>• Fuel management including weeds on private and public land are included in the BMS and the implementation Plan.</li> </ul>
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		<p>cleaning up around homes and sheds, removing vegetation in garden beds against walls, having a reliable water source, etc.</p> <ul style="list-style-type: none"><li>• Under “Objectives” may I remind Council that a “Community Values” Survey has already been done as preparation for the Green Wedge Management Plan.</li><li>• Reference to the GWMP should be made throughout the strategy.</li><li>• Consultation and communication with the community is vital.</li></ul>	
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7	Friends of Nillumbik	<ul style="list-style-type: none"> <li>• Agree to the 4 Strategic priorities</li> <li>• 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.</li> <li>• 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.</li> <li>• 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. We should encourage the planting of local grasses.</li> <li>• Private land burn-offs present enormous risk. Firestick and drip burning must be in the hands of the professionals. Haphazard and uninformed burning off can adversely affect both flora and fauna if performed incorrectly and at the wrong time of the year.</li> <li>• While exemptions 10/30 and 10/50 are state-legislated and unlikely to change, we question whether they’re evidence-based 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.</li> <li>• A one size fits all is not a desirable approach and must be avoided. 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</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• Roadside fuel management will continue to be a challenge but is included in the BMS and Implementation Plan as key initiatives for community, Vic Roads, CFA and Nillumbik Shire.</li> <li>• Information and advice to the execution of 10/30 and 10/50 is included in the Implementation plan along with more face to face advice to assist whole of property planning.</li> <li>• Cool burn is an option that has risk but is a worthy option to assist reduce risk and assist biodiversity.</li> </ul>
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		<p>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.</p>	
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Submission No	Name	Summary	Officer Response
8	David & Jean Nicholls	<ul style="list-style-type: none"> <li>• Inclusion of roads and bridges in consideration of infrastructure.</li> <li>• I agree with the 4 priorities.</li> <li>• I agree with the choice of Operating Principles. 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 2 temperature and dryness, paddock growth, major road works, etc. change and affect the outlook.</li> <li>• This report would underline current controls on private property burns and inform on any controlled cool burns.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• Evidence based information will be provided to assist better informed decisions by the community and the agencies.</li> </ul>



Submission No	Name	Summary	Officer Response
9	Cindy Allen	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Concentrate on measures that may decrease the impact of a fire event on Severe and Extreme Fire Rating Days.</li> <li>• 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.</li> <li>• Introduced weeds must be the first vegetation type to be removed as a fuel load contributor. The 10/30 &amp; 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.</li> <li>• There is much evidence suggesting that trees can protect homes from radiant heat and act as a wind shield during a fire event.</li> </ul>	<ul style="list-style-type: none"> <li>• The Victorian State Bushfire risk map clearly indicates Nillumbik Shire is one of the higher bushfire risk areas within Victoria and includes surrounding areas.</li> <li>• The BMS acknowledges the levels of FDR and is focused on the mitigation, prevention and preparedness and does not attempt to manage the response nor recovery phases of a bushfire.</li> <li>• Information and advice to the execution of 10/30 and 10/50 is included in the Implementation plan along with more face to face advice to assist whole of property planning including the protection trees may offer.</li> </ul>

Submission No	Name	Summary	Officer Response
10	Anonymous	<ul style="list-style-type: none"> <li>• Agree with the four strategic priorities however the principles, and goals do not appear to be well aligned to these priorities.</li> <li>• How does a 'hazardous tree removal' program reduce the impact of a bushfire incident? 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?</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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 way</li> </ul>	<ul style="list-style-type: none"> <li>• Based on feedback the goals have been refined and realigned to the strategic priorities.</li> <li>• Reference to vegetation has been redefined as 'fuel' and hazardous trees are treated within the implementation plan.</li> <li>• Individual and community planning both key aspects of the implementation plan.</li> <li>• Face to face assessment with improved tools to assist community members is included in the implementation plan.</li> <li>• Primacy of life is the overarching theme of the BMS.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan.</li> </ul>

Submission No	Name	Summary	Officer Response
11	Liz & Peter Mildenhall	<ul style="list-style-type: none"> <li>• We believe there should be a fifth priority that given the nature of Nillumbik Shire &amp; the Green Wedge to preserve the unique natural environment that we have chosen to live in.</li> <li>• 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.</li> <li>• We think the significance &amp; the responsibility of living in a shire with the Green Wedge is sadly lacking from the draft.</li> <li>• We would want environmentalists and conservationists to play a big role as key consultants in the whole process.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> </ul>



Submission No	Name	Summary	Officer Response
12	Andy Frampton	<ul style="list-style-type: none"> <li>• Suggest that an additional Strategic Priority that Bushfire Mitigation does not take priority over environmental protection.</li> <li>• Reinforce the principle that bushfire management needs to be considered as a component of promoting overall health of the environment.</li> <li>• 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.</li> <li>• 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 e.g. air, soils, water, micro-climates, shade, habitat, biodiversity, ecosystems. Again noting that vegetation has the potential to reduce fire risk.</li> <li>• Recognition of biodiversity within the "Challenges within the Shire" only acknowledges the importance of biodiversity as it is valued by the community.</li> <li>• 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.</li> <li>• I suggest an additional principle that states that all strategic priorities and goals will be supported by</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Evidence based information will be provided to assist better informed decisions by the community and the agencies.</li> </ul>

Submission No	Name	Summary	Officer Response
		evidence and that the evidence informing each goal will be made transparent.	

Submission No	Name	Summary	Officer Response
13	Ross & Christine Henry	<ul style="list-style-type: none"> <li>• Important additional strategy is the retention and protection of the biodiversity of the natural environment with furl reduction.</li> <li>• 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</li> <li>• Do not panic the community.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Evidence based information will be provided to assist better informed decisions by the community and the agencies.</li> </ul>



14	Anonymous	<ul style="list-style-type: none"> <li>• I would like to add that bushfire mitigation does not take priority over environmental protection.</li> <li>• I think bushfire management could be considered as an enhancement to the overall health of the environment. Principle 2 could state that “bushfire management enable/promote environmental protection”, rather than being presented as a balance between the two.</li> <li>• Creating a community focussed approach to bushfire.</li> <li>• 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.</li> <li>• Noting that vegetation has the potential to reduce fire risk. EG: On roadside reserves introduced grasses (e.g. Phalaris) and weeds (e.g. blackberries) generally have a far greater biomass (read fuel load) than indigenous grasses e.g. Poa, Kangaroo Grass.</li> <li>• So when mapping for burning off for fire mitigation purposes look at the plant type first.</li> <li>• We need to practice the 'precautionary principle'. For example, 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.</li> <li>• Bushfire management must support protection of lower &amp; medium storey indigenous vegetation, which provide very valuable habitat and food for wildlife.</li> <li>• 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.</li> <li>• Victoria's biodiversity is rapidly deteriorating in many parts of the state.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• Reference to vegetation has been redefined as ‘fuel’ and hazardous tress are treated within the implementation plan.</li> <li>• Individual and community planning both key aspects of the implementation plan.</li> <li>• Face to face assessment with improved tools to assist community members is included in the implementation plan.</li> </ul>
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|  |  | <ul style="list-style-type: none"><li>• Most species loss comes from practices such as grazing, tree clearing and fire protection on private land.</li></ul> |  |
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Submission No	Name	Summary	Officer Response
15	Anonymous	<ul style="list-style-type: none"> <li>• Principle 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 environment protection. Ingenious fire management is central to this, not a side note.</li> <li>• Leave and live is fantastic, but there are significant barriers. Where do people go, especially those with families?</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Primacy of life is the overarching theme of the BMS.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan.</li> </ul>
16	Jane Kaye	<ul style="list-style-type: none"> <li>• I believe the greatest difficulty is getting community involvement and to get members of the community to take ownership and be part of the process.</li> <li>• 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.</li> <li>• Go underground with power lines!</li> <li>• There are hazardous trees that must be removed! Roadside vegetation must also be slashed!</li> <li>• Priority to ensure communication in an emergency!</li> <li>• Community ownership is vital but do not know how you can create that involvement.</li> </ul>	<ul style="list-style-type: none"> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthened by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> <li>• Electrical assets and fire cause is included in the BMS and implementation plan placing reporting responsibility on responsible authorities.</li> <li>• Hazardous trees are included in the BMS and implementation plan.</li> </ul>

Submission No	Name	Summary	Officer Response
17	Guy Palmer	<ul style="list-style-type: none"> <li>• These priorities say nothing about either protecting or enhancing biodiversity or any other environmental aspects of the countryside.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Recognition is given to the community values and the place of belonging that exists within the Nillumbik community.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> </ul>



Submission No	Name	Summary	Officer Response
18	Fiona Macken	<ul style="list-style-type: none"> <li>• I think the mention of information media here is naïve and simplistic. It may increase knowledge, it is ineffective at creating behaviour change.</li> <li>• There needs to be more focus on community empowerment and a lot less on agency-led endeavours.</li> <li>• None of the four operating principles will be successfully undertaken without community collaboration and a sense of empowerment or ownership.</li> <li>• There is also little to no mention of residual risk throughout this document.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• If you want the community to buy the plan they have to be a part of creating the plan.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan acknowledges the aware, the informed and the knowledgable community members and highlights the need for different community connection approaches.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> <li>• Evidence based information will be provided to assist better informed decisions by the community and the agencies.</li> </ul>

19	Anonymous	<ul style="list-style-type: none"> <li>• Bushfire Mitigation needs to be integrated with considerations of how it contributes to promoting the overall health of the environment.</li> <li>• Managing fire in the landscape is about caring for the land, its ecosystems with all the life it supports, including flora and fauna and not limited to people.</li> <li>• Biodiversity is declining at an alarming rate in Nillumbik, Victoria and worldwide.</li> <li>• Principle 2 – should reconsider priorities – bushfire management needs to be considered as a component 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.</li> <li>• Creating a community focussed approach to bushfire that also ensures protection of native vegetation &amp; promotion of biodiversity.</li> <li>• Recognise vegetation not solely something that burns &amp; 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 – e.g. Poa, Kangaroo grass. So when planning burn offs, for fire mitigation purposes look at plant type first.</li> <li>• Use precautionary principle, follow nature-only slash native grasses after seeding has occurred, and cool burns should be used in bush and not every year. 2.4 *Bushfire management must support protection of lower &amp; medium storey indigenous vegetation – which provide habitats &amp; food for wildlife.</li> <li>• Nillumbik people love their local wildlife &amp; to be successful with fire mitigation, Council should listen to residents.</li> </ul>	<ul style="list-style-type: none"> <li>• Primacy of life is the overarching theme of the BMS.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthened by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan acknowledges the aware, the informed and the knowledgeable community members and highlights the need for different community connection approaches.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> <li>• Evidence based information will be provided to assist better informed decisions by the community and the agencies.</li> </ul>
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|  |  | <ul style="list-style-type: none"><li>• Universal recognition of biodiversity – Victoria's biodiversity is rapidly deteriorating.</li><li>• Most species loss comes from practices such as tree clearing, overgrazing, and fire protection on private land.</li><li>• Research how indigenous burns work. It's NOT slash &amp; burn but carefully planned patch burning, periodic cool burns, limited by un-burnable vegetation.</li><li>• All strategic priorities &amp; goals need to be supported by evidence &amp; such evidence will be transparent.</li></ul> |  |
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Submission No	Name	Summary	Officer Response
20	Alan Bonny	<ul style="list-style-type: none"> <li>• Refers to the 'environment' but does not define the 'value', economic or otherwise.</li> <li>• Responsibility to ensure that we don't destroy the qualities that make Nillumbik special, and manage and protect the native environment values for the future.</li> <li>• Fire management can be used to enhance the quality and biodiversity of the natural environment.</li> <li>• The strategy priorities should include a further requirement to "Ensure all work protects native vegetation and maintains biodiversity."</li> <li>• Victoria's biodiversity is rapidly deteriorating and the Strategy needs to address this with regard to best practice fire management.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> </ul>



Submission No	Name	Summary	Officer Response
21	Anonymous	<ul style="list-style-type: none"> <li>• Refers to the 'environment' but does not define the 'value', including its economic value.</li> <li>• The current draft is an either-or basis for Fire Safety versus Environmental preservation.</li> <li>• Mitigation strategies can be developed to enhance the quality and biodiversity of the environment.</li> <li>• 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.</li> <li>• Native vegetation has the potential to reduce fire risk, especially when compared with weed infestations that can have a far greater bio-mass.</li> <li>• Our declining biodiversity must also be duly recognised with regard to best practice fire management. Victoria's biodiversity is rapidly deteriorating and the strategy needs to address this.</li> <li>• Community education is vital to avoid over-zealous clearing of bushland.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Based on feedback the goals have been refined and realigned to the strategic priorities.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Reference to vegetation has been redefined as 'fuel' and hazardous tress are treated within the implementation plan.</li> <li>• Individual and community planning both key aspects of the implementation plan.</li> <li>• Face to face assessment with improved tools to assist community members is included in the implementation plan.</li> </ul>

Submission No	Name	Summary	Officer Response
22	Robyn Duff	<ul style="list-style-type: none"> <li>• Strategies should also include the valuing of the natural environment and balancing this against the need to protect assets.</li> <li>• Principle 2 should stress the importance of the natural environment in Nillumbik.</li> <li>• it is important that any fire reduction burns take into account the impact on the flora in the area</li> <li>• The draft BMS 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.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> </ul>

Submission No	Name	Summary	Officer Response
23	Janet Mattiske	<ul style="list-style-type: none"> <li>• Bushfire mitigation priorities must include environmental protection. And also need to ensure that works protect native vegetation and promote biodiversity of species.</li> <li>• Bushfire management must also enable/promote environmental protection. It must recognise that vegetation is not solely something that burns and therefore a risk.</li> <li>• It has vital relationships with life, air, soils, water, climate, ecosystems etc.</li> <li>• 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.</li> <li>• Include more research into management for retention of native vegetation and maintenance of biodiversity.</li> <li>• Strong emphasis on repeated and ongoing education for current and new residents.</li> <li>• The section on the Economy does not give any recognition to the environment.</li> <li>• The environment has economic value and requires recognition and a best practice fire mitigation strategy for its and its resident's protection.</li> <li>• 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's 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.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan acknowledges the aware, the informed and the knowledgable community members and highlights the need for different community connection approaches.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> </ul>

Submission No	Name	Summary	Officer Response
24	John Roberts	<ul style="list-style-type: none"> <li>• The Draft Strategy does not give sufficient emphasis to protecting Environment Preservation.</li> <li>• The draft is on an either-or basis for Fire Safety versus Environmental Preservation.</li> <li>• Mitigation strategies can be developed to enhance the quality and biodiversity of the environment.</li> <li>• Should create a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity.</li> <li>• For this reason we need to adopt a 'precautionary principle'.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> </ul>



Submission No	Name	Summary	Officer Response
25	Frank Pierce	<ul style="list-style-type: none"> <li>• The current Draft Strategy refers to the 'environment' but does not define its 'value'.</li> <li>• The 'economic value' of the environment should also be spelled out.</li> <li>• The tone of the draft is on an either-or basis for Fire Safety versus Environmental Preservation.</li> <li>• Mitigation strategies can be developed to enhance the quality and biodiversity of the environment.</li> <li>• Should create a community focussed approach to bushfire that also ensures protection of native vegetation and promotion of biodiversity.</li> <li>• Stop viewing vegetation solely as something that burns and is a threat.</li> <li>• 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.</li> <li>• Victoria's biodiversity is rapidly deteriorating and the Strategy needs to address this.</li> <li>• 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.</li> <li>• Community education is fundamental.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan acknowledges the aware, the informed and the knowledgable community members and highlights the need for different community connection approaches.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community and individual plans remain.</li> </ul>

Submission No	Name	Summary	Officer Response
26	Anonymous	<ul style="list-style-type: none"> <li>• I do not support the prevention of new developments under the disguise of excessive bushfire risk.</li> <li>• Fuel reduction, in my opinion has been a severely neglected aspect of fire preparedness. To see meaningful fuel reduction on council managed land and especially road side vegetation would be welcomed. An environmental priority I feel is given too much importance.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• BMS does not include the planning provision of new developments.</li> <li>• Fuel management is a key theme throughout the BMS.</li> <li>• CFA will remain a responsible authority and a referral authority.</li> </ul>

Submission No	Name	Summary	Officer Response
27	Norman Parris	<ul style="list-style-type: none"> <li>• The current Draft Strategy refers to the 'environment' but does not define its 'value', including its 'economic value'.</li> <li>• The tone of the draft is on an either-or basis for Fire Safety versus Environmental Preservation.</li> <li>• Mitigation strategies can be developed to enhance the quality and biodiversity of the environment.</li> <li>• 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.</li> <li>• Should create 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.</li> <li>• 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.</li> <li>• Our declining Biodiversity must also be duly recognised with regard to best practice fire management. Victoria's biodiversity is rapidly deteriorating and the Strategy needs to address this.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan acknowledges the aware, the informed and the knowledgable community members and highlights the need for different community connection approaches.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> </ul>

Submission No	Name	Summary	Officer Response
28	Anonymous	<ul style="list-style-type: none"> <li>• It is encouraging that council finally puts primacy of human life as No. 1 over all else.</li> <li>• 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.</li> <li>• 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.</li> <li>• Analysis of Neighbourhood Safer Places (places of last resort) and consider the establishment of Community Fire Refuges"</li> <li>• 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.</li> <li>• Review of the (often mandatory) requirement for revegetation works with planning permits in the shire?</li> <li>• We need to place a value on a cleared pasture areas for bushfire safety!</li> <li>• 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 defensible space for CFA fire crews and private landowners.</li> </ul>	<ul style="list-style-type: none"> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• The strategic themes and operating principle have been strengthened based on these comments and the intent presented has been included either in the strategy or the implementation plan with modification and inclusion of themes and words.</li> <li>• Partnerships and relationships are fundamental to the future success and underpin the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> </ul>

Submission No	Name	Summary	Officer Response
29	Anonymous	<ul style="list-style-type: none"> <li>• There is a proliferation of information available, people are either not accessing it or implementing its recommendations. I think some kind of face to face contact is needed.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• Information and advice to the execution of 10/30 and 10/50 is included in the Implementation plan along with more face to face advice to assist whole of property planning including the protection trees may offer and to encourage biodiversity.</li> <li>• Reference to vegetation has been redefined as 'fuel' and hazardous trees are treated within the implementation plan.</li> <li>• Individual and community planning both key aspects of the implementation plan.</li> <li>• Face to face assessment with improved tools to assist community members is included in the implementation plan.</li> </ul>
30	Jean Verso	<ul style="list-style-type: none"> <li>• Needs to be a fundamental change in attitudes and behaviours of Council staff and officers towards landowners. We want to be able to have co-operative interactions with Council.</li> </ul>	<ul style="list-style-type: none"> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS and includes council and agency staff.</li> </ul>



31	Max Parsons and Nillumbik Proactive Landowners Group	<ul style="list-style-type: none"> <li>• Nillumbik Shire Council 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• The DBMS identifies a number of NSC's legislated obligations to help mitigate the social, economic and environmental impacts of bushfire in Nillumbik".</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• PALs submit that the final BMS should trigger planning scheme amendments to remove the need to obtain a planning permit to undertake ground fuel reduction</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments and the intent presented has been included either in the strategy or the implementation plan with modification and inclusion of themes and words.</li> <li>• The Victorian State Bushfire risk map clearly indicates Nillumbik Shire is one of the higher bushfire risk areas within Victoria and includes surrounding areas.</li> <li>• Planning and settlement issues will be dealt with separate to the BMS.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Partnerships and relationships are fundamental to the future success and underpin the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthened by adopting Community development principles and sponsoring community centric and connection.</li> <li>• Planning and settlement issues will require further consideration.</li> </ul>
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		<p>works on private property with advice of local CFA brigades and/or other fire agencies and 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.</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li><li>• PALs suggest an additional item – 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.</li><li>• It is imperative to instigate, update and continually monitor a more general ground fuel reduction program working in conjunction with landowners.</li></ul>	
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32	Green Wedge Protection Group	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• "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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Educate people on how best to manage their properties that also allows for fire mitigation.</li> <li>• 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</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments and the intent presented has been included either in the strategy or the implementation plan with modification and inclusion of themes and words have been considered.</li> <li>• The Victorian State Bushfire risk map clearly indicates Nillumbik Shire is one of the higher bushfire risk areas within Victoria and includes surrounding areas.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Partnerships and relationships are fundamental to the future success and underpin the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthened by adopting Community development principles and sponsoring community centric and connection.</li> <li>• Electrical assets and fire cause is included in the BMS and implementation plan placing reporting responsibility on responsible authorities.</li> <li>• The implementation plan acknowledges the aware, the informed and the knowledgeable community members and highlights the need for different community connection approaches.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> </ul>
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		due to downed electrical lines while also improving amenity.	
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Submission No	Name	Summary	Officer Response
33	Betty Russell – Nillumbik Greens	<ul style="list-style-type: none"> <li>• Priority 2 could be reframed to achieve transformative change in attitudes towards incorporating strategies aimed at reducing the speed of climate change into planning and strategic docs.</li> <li>• 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.</li> <li>• 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.</li> <li>• Nillumbik Greens would like to propose some additions / modifications in relation to the following: <ol style="list-style-type: none"> <li>1. Climate Change impact needs positive climate change bushfire mitigation strats</li> <li>2. Biodiversity protection needs to be built into BMS</li> <li>3. Bushfire mitigation strategies to enhance biodiversity &amp; impact positively on climate change</li> <li>4. Extreme Weather Events</li> <li>5. Community Ownership of responsibility of implementation</li> <li>6. Other.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan acknowledges the aware, the informed and the knowledgable community members and highlights the need for different community connection approaches.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> </ul>



Submission No	Name	Summary	Officer Response
34	Tom Fisher	<ul style="list-style-type: none"> <li>• Partially agrees with the four strategic priorities, with suggested amendments to the first two strategic priorities.</li> <li>• Partially agrees with the four operating principles for risk management and bushfire mitigation.</li> <li>• Need to give more specific recognition to environmental considerations.</li> <li>• The second operating principle calls for balancing environmental protection with bushfire risk. The natural environment and its protection as set out in the Green Wedge policies is what sets Nillumbik apart from other council jurisdictions. We need to be careful that we don't destroy the very qualities that make it so special.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> </ul>

Submission No	Name	Summary	Officer Response
35	Lynne Johnstone	<ul style="list-style-type: none"> <li>• Partially agrees with the four strategic priorities.</li> <li>• Ultimately, climate change will increase the intensity and frequency of bushfires. Council's focus needs to be on reducing the impacts of climate change to effectively reduce the number of bushfires long term.</li> <li>• Partially agrees with the four operating principles for risk management and bushfire mitigation.</li> <li>• Believes education is key, to gain knowledge of bushfire behaviour based on science, not emotion.</li> <li>• The tone of the current draft is on an 'either-or' basis for Fire Safety vs Environmental Preservation. Too simplistic.</li> <li>• 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.</li> <li>• Stop viewing vegetation solely as something that burns and is a threat.</li> <li>• Our declining biodiversity must also be duly recognised with regard to best practice fire management. If we do not protect our habitat, we will be increasing the risk of climate change, more frequent bushfires and thereby increasing our risk to bushfire, instead of minimising it.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Partnerships and relationships are fundamental to the future success and underpin the BMS.</li> <li>• Shared responsibility, shared obligation and community centric and connected approaches underpin the BMS.</li> <li>• Community engagement is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• The implementation plan acknowledges the aware, the informed and the knowledgable community members and highlights the need for different community connection approaches.</li> <li>• The implementation plan sponsors the development of community plans that are developed with the community for the community.</li> </ul>

Submission No	Name	Summary	Officer Response
36	Anonymous	<ul style="list-style-type: none"> <li>• Partially agrees with the four strategic priorities.</li> <li>• Partially agrees with the four operating principles for risk management and bushfire mitigation.</li> <li>• Principle 1 and 3 – agreement</li> <li>• Principle 2 – bushfire risk and environment protection should not be seen as opposites. Environment management must have two aims: reduce fire risk and encourage biodiversity.</li> <li>• Principle 4 – we hope ‘holistic’ does not mean a ‘one size fits all’ fuel reduction approach. Environmentally sensitive areas with high biodiversity values will need a more careful fuel reduction treatment.</li> <li>• Botanical knowledge must inform the fuel reduction program.</li> <li>• Cool burning must be controlled by professionals with good biodiversity advice so that adverse impacts on flora/fauna and soil degradation are avoided.</li> <li>• Addition of the words ‘biodiversity protection’ to goal 4.1.</li> <li>• Protection of human life can be best addressed at the ‘settlement planning’ stage. Dwelling approvals in some Bushfire Management Overlay areas should be refused.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• Partnerships and relationships are fundamental to the future success and underpin the BMS.</li> <li>• Cool burn is an option that has risk but is a worthy option to assist reduce risk and assist biodiversity.</li> </ul>

37	Brian Murray – President of Nillumbik Ratepayers Association Inc.	<ul style="list-style-type: none"> <li>• Two reports from 2003 by bushfire experts David Packham and Rod Incoll (presented to Council previously) should be considered in conjunction with this submission.</li> <li>• The Emergency Management legislation rightly, in the submitter's opinion, takes the responsibility away from Council and looks at fire mitigation at a regional level where it can be effectively addressed.</li> <li>• As few private landowners own forest one could argue that 'bushfire mitigation' works are desperately needed in and on publicly owned land.</li> <li>• Legislation must be modified, or preferably removed that restricts private landowners from undertaking legitimate fire prevention works on their properties.</li> <li>• Balancing environment with bushfire risk weakens bushfire protection.</li> <li>• 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.</li> <li>• In relation to the Emergency Management Future Directions Plan, most of what we read in these documents is about legislative requirements, and future requirements, which have nothing to do with actual bushfire mitigation.</li> <li>• Fuel loads, mainly surface fuels have been a major issue when attempting to mitigate bushfires. If fuel loads were managed then most fires even on extreme days would be controllable. Therefore, less loss of life and property, and less damage to the environment and infrastructure.</li> <li>• We find it disappointing to say the least that this current Victorian Government has decided to discontinue the</li> </ul>	<ul style="list-style-type: none"> <li>• The Bushfire Mitigation Strategy acknowledges the levels of FDR and is focused on the mitigation, prevention and preparedness and does not attempt to manage the response nor recovery phases of a bushfire.</li> <li>• The BMS provides an overarching focus on primacy of life and aligns to climate change, biodiversity and the Green Wedge Management Plan.</li> <li>• The BMS works within existing legislation and state government policy with strategic priority 4 providing an opportunity for Advocacy.</li> <li>• Nillumbik Shire is predominantly a private land municipality and therefore there is a strong focus on community and applying current planning and legislative provisions including the provisions of and execution of 10/30 and 10/50.</li> <li>• The success of the BMS implementation will rely on strong partnerships and relationships underpinned by shared responsibility, shared obligation and community centric and connected approaches, and supported by community engagement that is strengthened by adopting Community development principles and sponsoring community centric and connection.</li> </ul>
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		<p>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.</p>	
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38	Sue McKinnon	<ul style="list-style-type: none"> <li>• Smoke impacts need to be determined and fire used as a last resort for bushfire mitigation.</li> <li>• Cessation of fuel reduction burns in surrounding forests. Forests are more prone to fire for 14 to 28 years after burns. Fuel reduction burns should not be allowed in damp and wet forest as these burns may make the forest more fire prone.</li> <li>• Past practices of using fire as a management tool are no longer an indication of behaviour appropriate today.</li> <li>• Causes of fire needs to be addressed, not just mentioned. For example, the draft BMS contains reference to arson, but no comment on mitigation of fire threat by reducing risk of arson.</li> <li>• 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.</li> <li>• Use prescribed fires as a mitigation measure only as a last resort. Prescribed burns carry significant side effects. Research on the effectiveness of prescribed burns as a mitigation measure shows that little to no leverage is achieved. Research has also shown that fires have been smaller and less severe in long-unburnt forests. Precautionary principles should apply.</li> <li>• Ms McKinnon suggests some changes to the control assessment section of the BMS, and stresses that methods needs to be determined using current scientific evidence.</li> <li>• Ms McKinnon suggests the addition of 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.</li> <li>• Ensure that reserve works comply with other vegetation regulations by inserting a statement (refer to full submission). Without this, there is a risk that native</li> </ul>	<ul style="list-style-type: none"> <li>• Fire causation including arson are included in the implementation plan.</li> <li>• New approaches and encouraging agency adopt new technology is included in the intent of the implementation plan.</li> </ul>
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		<p>vegetation removal regulations will be contravened. Council have a responsibility to ensure that its management plans do not encourage contravention of the planning scheme regulations.</p> <ul style="list-style-type: none"><li>• Slashing should be avoided in all reserves of high and moderate conservation value. Slashing of native shrubs should only be allowed within 10 m of non-accommodation buildings to ensure compliance with native vegetation removal regulations.</li><li>• Delete clause “other work carried out with the prime objective of providing amenity”. Amenity is subjective. Include measures to restore ecological health, not “providing amenity”.</li><li>• 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.</li></ul>	
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Submission No	Name	Summary	Officer Response
39	Neil Marshall	<ul style="list-style-type: none"> <li>• Strongly support the four priorities that shape the BMS.</li> <li>• Council should implement the concept of Priority Fuel Management Areas (PFMAs). PFMAs show where bushfire fuel treatments will most effectively reduce long-term bushfire risk to communities.</li> <li>• Council should review the Planning Controls on private and public land, so that both private landowners and authorities responsible for public land are not impeded from taking reasonable steps to clear bushfire fuel hazards from their land.</li> <li>• Council should reassess the environmental significance of both roadsides and private land within the area of the Bushfire Management Overlay.</li> <li>• Council should encourage private landowners to use machinery to remove bushfire fuels from their properties.</li> <li>• Council should work with CFA to establish proper safety “buffer zones” between the bushland reserves and private land holdings.</li> <li>• Council should provide regular information to land owners on which plants are fire risks and which plants can’t be removed as they are a protected species.</li> <li>• Council 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.</li> <li>• Council should consider obtaining expert assistance in preparing the Implementation Plan.</li> <li>• Council should fund the implementation of “Information Evenings” in each of the townships within the Bushfire Management Overlay.</li> </ul>	<ul style="list-style-type: none"> <li>• The strategic themes and operating principle have been strengthened based on these comments and the intent presented has been included either in the strategy or the implementation plan with modification and inclusion of themes and words.</li> <li>• The Victorian State Bushfire risk map clearly indicates Nillumbik Shire is one of the higher bushfire risk areas within Victoria and includes surrounding areas.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• The success of the BMS implementation will rely on strong partnerships and relationships underpinned by shared responsibility, shared obligation and community centric and connected approaches, and supported by community engagement that is strengthened by adopting Community development principles and sponsoring community centric and connection.</li> <li>• All issues raised have been included, addressed to support the BMS and Implementation plan.</li> </ul>

Submission No	Name	Summary	Officer Response
40	Rossley Paul Gardner & Heather Gardner	<ul style="list-style-type: none"> <li>• Protecting life and property 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.</li> <li>• The need to be able to manage ground fuel on large private properties is paramount. It is most important that landowners have an ability to remove ground fuel rather than allow it to be build up year after year.</li> <li>• It is important that the rural component is properly prepared for the fire season.</li> <li>• We must continue to protect the diversity of flora and fauna in our Green Wedge.</li> </ul>	<ul style="list-style-type: none"> <li>• The BMS provides an overarching focus on primacy of life and aligns to climate change, biodiversity and the Green Wedge Management Plan.</li> <li>• Nillumbik Shire is predominantly a private land municipality and therefore there is a strong focus on community and applying current planning and legislative provisions including the provisions of and execution of 10/30 and 10/50.</li> </ul>

41	Bill Lord	<p>This submission speaks to seven points featured in the draft BMS and the accompanying information session. Suggestions are made to improve the BMS on these seven points.</p> <p><u>Point 1</u></p> <ul style="list-style-type: none"> <li>Mr Lord believes that the extremely important point on page 13 of the draft BMS, being <i>'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'</i> should be stated towards the front of the document.</li> <li>Suggestion to include the limitation of 'no amount of slashing and burn-offs will affect an extreme weather fire' also at the beginning of the document.</li> </ul> <p><u>Point 2</u></p> <ul style="list-style-type: none"> <li>In regards to the "fire mitigation vs natural environment approach", the submission eludes to the need of practicing the 'precautionary principle'. For example, only slash native grasses after they have seeded and any burning off in bush areas should be cool burns and not occur every year.</li> <li>Mr Lord suggests rewording of point 2 on page 13 of the draft BMS to be <i>'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.'</i>, in order to remove the apparent competition between reducing bushfire risk and protecting biodiversity and the environment.</li> </ul> <p><u>Point 3</u></p> <ul style="list-style-type: none"> <li>Curbing misinformation within the community in relation to how various flora impact the risk of bushfire.</li> </ul> <p><u>Point 4</u></p>	<ul style="list-style-type: none"> <li>The strategic themes and operating principle have been strengthened based on these comments and the intent presented has been included either in the strategy or the implementation plan with modification and inclusion of themes and words.</li> <li>The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>The success of the BMS implementation will rely on strong partnerships and relationships underpinned by shared responsibility, shared obligation and community centric and connected approaches, and supported by community engagement that is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>All issues raised have been included, addressed to support the BMS and Implementation plan.</li> </ul>
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- Large trees are part of a close ecosystem that includes the understorey and ground cover vegetation. Biodiversity is recognised as being important, so the strategy now needs action.
- Reiterates the need to exercise the 'precautionary principle', i.e. not make slashing and burn-offs an annual occurrence. This needs to be mentioned in the BMS.

Point 5

- Develop a systems view of the natural world. Weeds do not help fire mitigation.
- When mapping for burning off for fire mitigation purposes, have Council's Environment Team look at the plant type first and include this in the strategy. The strategy could suggest that Council fund and use the Environment Team's resources to weed particular road reserves of pasture grasses and so help the native grasses to take over and thus help bushfire mitigation.

Point 6

- Council to consider land management strategies in the context of ecosystems and the two global crises of climate change and biodiversity loss. BMS should directly address these two issues.

Point 7

- For slashing and burning off Council land, Environment Team, through the Green Wedge Management Plan (GWMP), to be consulted first to check indigenous plants and weeds, and anything particularly vulnerable.
- Fire mitigation to be used in conjunction with GWMP to foster better natural environment wherever possible.

Other considerations

- BMS needs to be consistent with GWMP and Bushfire Management Overlays (BMO).

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|  |  | <ul style="list-style-type: none"><li>• Paragraphs 3 and 5 on page 6 need rewriting to be factual.</li><li>• Consistent with point 2, the removal of competition and 'balancing' priorities.</li></ul> |  |
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Submission No	Name	Summary	Officer Response
42	June English	<p>This submission refers to discrepancies between the draft BMS and the Victorian Bushfires Royal Commission (VBRC) reports, namely:</p> <ul style="list-style-type: none"> <li>• VBRC reports state ‘embrace mitigation rather than focusing on recovery from natural disaster’, whilst draft BMS states ‘need to improve the way we prevent, prepare for, respond to and recover from fire’</li> <li>• VBRC reports mention shared responsibility to mean individual property owners should maintain their property in a manner that reduces risk from bushfires, whilst draft BMS interprets shared responsibility as agency collaboration and a community-centric model.</li> <li>• Draft BMS states that bushfires have left a significant scar, which has called for a new approach to bushfire management, whilst VBRC does not suggest a new approach, rather ‘a target if 5 to 8 per cent prescribed burning of public land is necessary for community safety’.</li> </ul>	<ul style="list-style-type: none"> <li>• The BMS acknowledges the levels of FDR and is focused on the mitigation, prevention and preparedness and does not attempt to manage the response nor recovery phases of a bushfire.</li> <li>• The strategic themes and operating principle have been strengthened based on these comments and the intent presented has been included either in the strategy or the implementation plan with modification and inclusion of themes and words.</li> <li>• The BMS is aligned to climate change, biodiversity and the Green Wedge Management Plan including Primacy of life is the overarching theme of the BMS.</li> <li>• The success of the BMS implementation will rely on strong partnerships and relationships underpinned by shared responsibility, shared obligation and community centric and connected approaches, and supported by community engagement that is strengthen by adopting Community development principles and sponsoring community centric and connection.</li> <li>• All issues raised have been included, addressed to support the BMS and Implementation plan.</li> </ul>