STATUTORY PLANNING INTERNAL REFERRAL
PLANNING ARBORIST
INFORMATION REQUIRED

Application Number:	PDPLANPER-2025/000848
Application Description:	Buildings and works associated with a caravan park in the Rural Activity Zone (RAZ) and the Bushfire Management Overlay (BMO)
Application Address:	1805 Phillip Island Rd Cowes
Planner:	[redacted]
Zones:	RAZ
Overlays:	BMO
Date referred:	10/11/2025
Referral response date	12/01/2026
Arborist:	[redacted]
Response required by:	**N/A – Multiple permit apps has resulted in time frames being out.**

Plans to be assessed	
Development Plans	YES
Arborist Report	YES
Landscape Plan	
Survey Plan	YES

REFERRAL TYPE:

☒ New planning permit application
☐ Amended planning permit application (Section 72/Secondary Consent)
☐ Plans to comply with an issued planning permit e.g. Landscape Plan
☐ Pre-Application advice request
☐ Planning Enforcement Matter
☐ Other (please specify)

ARBORIST REFERRAL RESPONSE:

☒ *Require additional information to make a decision (list required info below)*

☐ *No Objection (conditions not required)*

☐ *Object (grounds for objection are listed below)*

TREES PROPOSED TO BE REMOVED			
Tree #	**Tree species**	**Permit Required (Y/N. Planning, Local Law, Both)**	**Removal Supported**
73	*Melaleuca styphelioides*	Y Local Law	Y
162	*Eucalyptus globulus*	Y Local Law	Y
172	*Eucalyptus globulus*	Y Local Law	N
179	*Eucalyptus globulus*	Y Local Law	N
184	*Eucalyptus globulus*	Y Local Law	N
189	*Eucalyptus globulus*	Y Local Law	N
191	*Eucalyptus globulus*	Y Local Law	Y
193	*Eucalyptus globulus*	Y Local Law	Y
194	*Eucalyptus globulus*	Y Local Law	N

ARBORIST COMMENTS:

Following a preliminary assessment of the application a number of issues have been identified including the following:

- Multiple trees protected by the Local Law have been nominated for removal with the application, not all tree removals will be supported.

It is considered that trees 172, 179, 184, 194 and 212 are generally appropriate for the site, maintain fair-good health and structure and can be maintained to a low fire threat level by maintaining canopy separation and ensuring limbs are pruned a minimum of 2m off the ground.

For ease of assessment and to reduce communication issues between permit applications it would be beneficial for the applicant to show trees 172, 179, 184, 189 and 194 as retained and amend the design to show these trees as being retained. I attended the site with Councils MFPO (I am still awaiting the MFPO's written comments on the trees)

and he was generally of the opinion that with the level of vegetation to be removed from the site, these trees will be able to be maintained to a low fire threat level.

Council understands that tree 184 may require removal due to road design however with amendments to show trees 172, 179, 189 and 194 as being retained it may be possible to realign the road so as to retain tree 184, if this is not possible this will need to be demonstrated.

To streamline the assessment process, it would be preferable for the applicant to directly address the concerns outlined below, rather than Council liaising with the General Manager of Park Lane Group to then relay required design changes back to the applicant. This approach would remove an additional layer of correspondence and assist in resolving design modifications to facilitate the retention of Trees 172, 179, 184, 189 and 194 in a timely manner.

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DS Referral – Engineering conditions

PP2025-000848 - 1805 Phillip Island Rd Cowes

Application Description:	Buildings and works associated with a caravan park in the Rural Activity Zone (RAZ) and the Bushfire Management Overlay (BMO)
Referral Type:	
Application Address:	1805 Phillip Island Rd Cowes
Title Particulars:	
Date Received:	
Planner:	Tim Berger
Zones:	
Overlays:	
Date referred to AM:	10 Nov 2025
Development Engineer:	MS
Response required by:	

Advice is required in relation to:
Assess drainage and access.

ASSET MANAGEMENT REFERRAL RESPONSE:

☐ *Require additional information to make a decision (list required info below)*

☒ *No objection (any applicable conditions listed below)*

☐ *Object (grounds for objection are listed below)*

COMMENTS

Have nonstandard conditions been applied to this permit? Yes ☐ *No* ☒ *If yes, please provide details.*

DS internal notes: RFI raised earlier for drainage strategy and internal passageway along swelt path to accommodate emergency services vehicles. Provided response along with plans reviewed. Condition compiled accordingly to progress for permit.

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Engineering conditions:

SITE CIVIL DESIGN PLANS

Before the use commences, detailed civil construction plans must be submitted to and approved by the Responsible Authority. When approved, the plans will be endorsed and will then form part of the permit. All construction plans submitted for approval must be consistent with this permit and must conform with the requirements of all relevant servicing authorities. The plans must be drawn to scale with dimensions and an electronic copy (PDF) must be provided. The plans must show:

a) Drainage of the subject land, including levels or contours of the land (including relevant external catchments). The drainage plan must be prepared in accordance with the requirements of the Infrastructure Design Manual (IDM) as amended and must provide for the following:

   i. How the subject development will be drained for a 10% AEP storm event to the legal point of discharge.

   ii. An underground pipe drainage system conveying stormwater to the legal point of discharge and connecting into Bass Coast Shire Council's stormwater drainage system by the existing underground drainage property connection.

CONSTRUCTION

Before the use commence, the following works must be completed to the satisfaction of the authority responsible, including all necessary permits being obtained and inspections undertaken:

a) All civil construction works, must be constructed in accordance with the civil design plans for the property as endorsed by the authority responsible pursuant to this planning permit

b) All drainage works (excluding any above ground detention tanks deferred via a Section 173 agreement) in accordance with the endorsed civil plans.

c) Photographic evidence of the legal point of connection to Council's drainage system must be provided if Council inspection cannot be arranged prior to backfilling.

d) As-constructed levels must be provided to AHD for any new Council assets constructed with the development.

MUD ON ROADS

No mud, dirt, sand, soil, clay, stones, oil, grease, scum, litter, chemicals, sediments, gross pollutants, animal waste or domestic waste shall be washed into, allowed to enter or discharged to the stormwater drainage system, receiving waters or surrounding land and road reserves, during the construction works hereby approved to the satisfaction of the responsible authority.

NOTES:

Other permits may be required

Nothing in the grant of this permit should be constructed as granting any permission other than planning permission for the purpose described. It is the duty of the permit holder to acquaint themselves, and comply, with all other relevant legal obligations (including any obligation in relation

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to restrictive covenants and easements affecting the site) and to obtain other required permits, consents or approvals. This may include (but not limited to):

- Road Occupation Permits.
- Asset Protection Permits.
- Building Permits.
- Legal Point of Stormwater Discharge.

For further information please contact Bass Coast Shire Council on 5671 2211.

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Department of Energy, Environment and Climate Action

8 Nicholson Street
East Melbourne, Victoria 3001
Email: *pe.assessment@deeca.vic.gov.au*
deeca.vic.gov.au

Statutory Planning
Bass Coast Shire Council
76 McBride Avenue
WONTHAGGI VIC 3885

Ref: CMS 12272

planningadmin@basscost.vic.gov.au

Dear Sir / Madam

PLANNING APPLICATION NUMBER:	**2025/000845**
PROPOSAL:	**DEVELOP 23 REPLACEMENT ACCOMMODATION CABINS**
ADDRESS:	**1805 & 1825 PHILLIP ISLAND ROAD, COWES**
DEECA RESPONSE:	**NO OBJECTION**

Thank you for your correspondence received on 6 January 2026.

The application is for the construction of replacement accommodation (cabins) in an existing caravan park. Native vegetation will be removed for both the cabins and a fence to reduce bushfire risk by relying on bushfire exemptions removing the need for a planning permit under the native vegetation regulations.

The land is zoned Rural Activity and the Bushfire Management Overlay applies under the *Bass Coast Planning Scheme*.

Notice of application was given to the Department of Energy, Environment and Climate Action (DEECA) in accordance with Section 52 of the *Planning and Environment Act* 1987 (the Act). As an adjacent land owner (Section 52(1)(a), the Crown land is occupied by the Koala Conservation Reserve under delegated land management to the Phillip Island Nature Park. DEECA has also considered the application in relation to native vegetation regulation as Section 52(1)(d) notice under the Act.

DEECA has considered this application and **does not object** to the grant of a permit.

If you require further information in relation to this matter, please contact [redacted] Senior Planning Officer at pe.assessment@deeca.vic.gov.au

[redacted]
Senior Planning Officer, Central East Planning Services
Planning and Environment Assessment

7/01/2026

Any personal information about you or a third party in your correspondence will be protected under the provisions of the *Privacy and Data Protection Act 2014*. It will only be used or disclosed to appropriate Ministerial, Statutory Authority, or departmental staff in regard to the purpose for which it was provided, unless required or authorized by law. Enquiries about access to information about you held by the Department should be directed to foi.unit@delwp.vic.gov.au or FOI Unit, Department of Energy, Environment and Climate Action, PO Box 500, East Melbourne, Victoria 8002.

VICTORIA State Government

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cfa.vic.gov.au

Patron: Her Excellency Professor the Honourable Margaret Gardner AC, Governor of Victoria

CFA Fire Risk, Research and Community Preparedness
8 Lakeside Drive Burwood East Vic 3151
Email: firesafetyreferrals@cfa.vic.gov.au

CFA Ref: **8000-410540-147684**
Council Ref: **PDPLANPER-2025/000848**

22 October 2025

[redacted]
Bass Coast Shire Council
PO Box 118
WONTHAGGI VIC 3995
basscoast@basscoast.vic.gov.au

Dear [redacted],

CONDITIONAL CONSENT TO THE GRANT OF A PERMIT

Application No: PDPLANPER-2025/000848
Site Address: 1805 & 1825 Phillip Island Road, Cowes
Proposal: REPLACEMENT CABINS IN CARAVAN PARK – BMO APPLIES

I refer to correspondence dated 2 October 2025 seeking comments on the above application.

The applicant's agent has further advised that a revised design is proposed with additional cabins in the same area nominated for redesign.

CFA, as a Referral Authority pursuant to Section 55 of the *Planning and Environment Act 1987* (Act) has considered and does not object to the grant of a permit for the above proposal subject to –

- Any mandatory conditions specified within the planning scheme; and
- The following conditions being included on any planning permit that may be issued.

– Start of Conditions –

1. Bushfire Management Plan Required

Before the development starts, an amended Bushfire Management Plan must be prepared to the satisfaction of CFA then submitted to and endorsed by the Responsible Authority. Once endorsed the plan must not be altered unless agreed to in writing by CFA and the Responsible Authority.

The plan must be generally in accordance with the plan by Jardine Johnstone, Attachment 3 dated 29/08/2025, but modified to show the proposed amended layout with additional cabins and in line with the approved design layout, and to refer to the CFA Caravan Park Fire Safety Guidelines 2024.

2. Holiday Park Design

Before the works commence and any design drawings are endorsed for the permit the proposed design layout shall be shown to be compliant and to the satisfaction of CFA and the responsible authority in accordance with the Residential Tenancies (Caravan Parks and Movable Dwellings Registration and Standards) Regulations 2024, and the regulation referenced – CFA Caravan Park Fire Safety Guidelines 2024 and including the following being implemented to a satisfactory level:

2.1 Emergency vehicle access and firefighting equipment – of hose reels and hydrants.

2.2 The layout for cabins and sites shall provide for the physical separation of structures to the minimum 2m as required and clear firefighter access that is always a minimum 1m, including allowing for carparking and rear access where fences are to be maintained.

2.3 A means of landscape fire risk mitigation for a grass and scrub fire impacting the park from the northwest direction and including the adjoining reserve, shall be proposed as a satisfactory non-combustible barrier to such impact on the proposed cabins and sites.

3. Emergency Management Plan Updates

The park emergency management plan shall be updated to incorporate the proposed alterations to the park under this permit and incorporate any endorsed bushfire management plan.

– End of Conditions –

Further Comments

- CFA understands the site is a registered caravan park for the purposes of the *Residential Tenancies Act 1997*. As such, the development must meet the requirements of the *Residential Tenancies (Caravan Parks and Movable Dwellings Registration and Standards) Regulations 2024*, which includes meeting the provisions of the *CFA Caravan Park Fire Safety Guidelines 2024* (the *CFA Guidelines*).

- While fire hydrants are indicated on the site plans, it is unclear if hose coverage aligns with the provisions of the CFA Guidelines. It is also unclear how fire separation will be achieved for the duplex style unregistrable movable dwellings (UMDs), e.g. separated by a fire rated wall achieving an FRL of 60/60/60.

- The applicant should ensure the development will meet the provisions of the CFA Guidelines to avoid potential non-compliance in the future.

- CFA requests that a copy of any permit and a copy of any notice given under section 64 or 65 of the Act be sent to CFA pursuant to section 66 of the Act.

If you wish to discuss this matter in more detail, please do not hesitate to contact [redacted].

Yours faithfully

[redacted]
Bushfire Planning Coordinator
CFA Fire Risk, Research and Community Preparedness

cc: [redacted]