



Our Ref: D19901  
Your Ref: PA21/47

Ryan Fleming  
Shire of Serpentine-Jarrahdale  
[info@sishire.wa.gov.au](mailto:info@sishire.wa.gov.au)

Dear Mr Fleming

**RE: VULNERABLE LAND USE - LOT 251 SOUTH WESTERN HIGHWAY KEYSBROOK - PROPOSED CHANGE OF USE - NATURE BASED CAMPING SITE**

I refer to your email dated 2 February 2021 regarding the submission of a Bushfire Management Plan (BMP) (Version 1.0), prepared by Bushfire West and dated 4 December 2020, for the above development application.

This advice relates only to *State Planning Policy 3.7 Planning in Bushfire Prone Areas* (SPP 3.7) and the *Guidelines for Planning in Bushfire Prone Areas* (Guidelines). It is the responsibility of the proponent to ensure the proposal complies with relevant planning policies and building regulations where necessary. This advice does not exempt the applicant/proponent from obtaining approvals that apply to the proposal including planning, building, health or any other approvals required by a relevant authority under written laws.

**Assessment**

- In line with the State Core Objective of Emergency Risk Management - *People: protect lives and wellbeing of persons*, DFES has assessed this proposal against SPP 3.7 and the Guidelines. DFES acknowledges this proposal falls within the scope of the Western Australian Planning Commission's *Position Statement: Tourism land uses in bushfire prone areas* (the Statement). The decision maker can consider the policy intent of the Statement, particularly regarding the primacy of life.
- The current provisions of SPP 3.7 and the Guidelines do not provide for tourism land uses to be considered differently to any other vulnerable land use and, as such, DFES have assessed the proposal against SPP 3.7 and the Guidelines.
- Tourism land uses, such as primitive camping, are considered a vulnerable land use as prescribed by section 5.5.1 'Vulnerable Land Uses' of the Guidelines.
- Vulnerable land uses located in designated bushfire prone areas require special consideration, especially as primitive camping activities generally have limited facilities and are in remote locations and visitors may be unfamiliar with their surroundings and bushfire impacts.
- Consequently, and in accordance with our advisory role, DFES have highlighted in the assessment below the residual bushfire risks associated with the tourism development and compliance with the bushfire protection criteria to aid decision making.

**1. Policy Measure 6.5 a) BAL Contour Map**

Issue	Assessment	Action
<b>Methodology</b>	A BAL Contour Map has not been provided in accordance with Appendix 3 of the Guidelines. Given that multiple campsites are proposed across the subject	Modification to the BMP is required.

	lot a BAL Contour Map is a more appropriate tool to provide an assessment of the bushfire risk across the entire site.	
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## 2. Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria

Element	Assessment	Action
<b>Location and Siting and Design</b>	<p><b>A1.1 and A2.1 – not demonstrated</b></p> <p>The BAL ratings cannot be validated for the reason(s) outlined in the above table. It has not been demonstrated that the campsites can achieve BAL-29 or below.</p> <p>Considered design will ensure the proposal meets the intent of this element by locating campsites in areas with the least possible risk. DFES do not support the creation of 10 campsites within BAL-40/BAL-FZ.</p> <p>DFES recommend the design is revised to provide adequate hazard separation and ensure no areas designated for camping are located in areas of BAL-40/BAL-FZ.</p> <p>The campsite locations are disparate and have not been clustered to ensure bushfire protection measures can be achieved. They are proposed to be 200 metres apart. The letter accompanying the development application from the proponent also states that 11 campsites are proposed with one being located on the top of the hill for more privacy. Campsite 11 is not shown in the BMP.</p>	Modification of the BMP required.
<b>Water</b>	<p><b>A4.3 – not demonstrated</b></p> <p>The BMP states that a tank is already installed with 10,000L reserved for firefighting purposes to comply with Element 4. It is unclear if the tank is dedicated for firefighting or a dual-purpose tank. Dual-purpose tanks are not supported.</p> <p>The acceptable solution is for a tank to be installed which is dedicated for firefighting purposes for the following reasons:</p> <ul style="list-style-type: none"> <li>• The use of domestic water for firefighting purposes is prohibited under the <i>Bushfires Act 1954</i>.</li> <li>• In the event of an emergency incident firefighters may drain the entire domestic tank in suppression efforts. Until the tank is refilled residents cannot return to their homes.</li> <li>• When a tank, used mainly for domestic purposes, is entirely emptied the sediment at the bottom of the tank may be disturbed when re-filling which can make the water unpotable.</li> <li>• There is no guarantee that the tank will have the reserve of 10,000L as this is at the discretion of the landowner.</li> </ul> <p>It is also unclear if the existing farm structures have any water tanks dedicated for fire fighting purposes. Consideration should</p>	Modification of the BMP required.

	<p>be given to upgrading the water provisions for the existing structures.</p> <p>Any proposed water tanks dedicated for firefighting purposes and adjacent hard-standing should achieve BAL-29 or below and be accessible to a type 3.4 appliance.</p>	
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### 3. Policy Measure 6.6.2 Vulnerable land uses in areas where BAL-40 or BAL-FZ applies

Issue	Assessment	Action
<b>Extreme bushfire hazard and/or BAL-40/ BAL-FZ applies</b>	<p>Subdivision and development applications for vulnerable or high-risk land uses in areas of BAL-40/BAL-FZ will not be supported unless they comply with policy measure Clause 6.7.2 of SPP 3.7.</p> <p>The proposal is not considered to meet the definition of unavoidable development.</p>	Comment only.
<b>Bushfire Emergency Evacuation Plan (EEP)</b>	<p>The referral has included a '<i>Bushfire Emergency Evacuation Plan</i>' for the purposes of addressing the policy requirements. Consideration should be given to the Guidelines Section 5.5.2 '<i>Developing a Bushfire Emergency Evacuation Plan</i>'. This contains detail regarding what should be included in an EEP and will ensure the appropriate content is detailed when finalising the EEP to the satisfaction of the Shire.</p>	Comment only.

#### **Recommendation – not supported modification required**

It is critical that the bushfire management measures within the BMP are refined, to ensure they are accurate and can be implemented to reduce the vulnerability of the development to bushfire. The proposed development is not supported for the following reasons:

1. The development design has not demonstrated compliance to –  
Element 1: Location,  
Element 2: Siting and Design, and  
Element 4: Water.

If you require further information, please contact Sasha De Brito – Coordinator Land Use Planning on telephone number 9395 9703.

Yours sincerely



**Ron de Blank**  
**DIRECTOR LAND USE PLANNING**

16 March 2021