
**PROPOSED PLANTATION - LOT 1 (No 1053) & LOT 12168 (No 977) BOKERUP ROAD,
FRANKLAND RIVER**

- ***Additional advice by Applicant / Summary***

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- **The combined lot area is approximately 702.33 hectares.**
- **The plantation area is 562.70ha**
- **The new environmental plantings area is 7.3ha**
- **Native vegetation preserved is 60.3ha**
- **Wetlands are 0.7ha**
- **Firebreaks are 60.8ha**

- ***Compartment Sizes / Operational Map***

The Operations Map divides both lots into different compartments which is summarised in a table. The applicant has provided a corrected Operations map and updated table which is included in the agenda item for Council.

Officer Comment:

- Report states there is approximately 580ha of plantation area. The map shows 558ha.

See map and breakdown on page 1. Some of these figures have adjusted. Table 1 has been updated to reflect these figures.

- It is difficult to see where the fencing is on the map. The report states there is external fences. Please clarify if any further internal fencing is proposed (eg along creeklines/ existing remnant vegetation or new kangaroo proof fencing).

External fences exist and are ringlock in most cases. These will be maintained as such.

No new specific kangaroo proof fencing is proposed. My client will maintain boundary fences. My client will undertake usual vermin management within the property as part of their operations. Like any farmer, vermin management as required is essential to protect and manage their investment.

It is noted that any internal fencing will be removed to accomodate the compartments, apart from where there is some fencing existing along creek lines which will remain as is.

- As grazing is mentioned it is recommended that areas of native vegetation, creeklines and revegetation areas be protected.

It is not necessary to fence areas of environmental planting within a plantation operation.

There is potential for the property to be grazed by livestock once the plantation is established. My client advises that if they were to pursue this, it would occur once the trees have reached certain maturity, perhaps 3+ years. My client will require as condition of any lease that might grazing beneath the trees to appropriately fence any impacted areas of environmental planting as a condition of the lease, to keep livestock out of these areas whilst the grazing occurs.

The following would be accepted as a condition of approval. *“In the event the property or parts of the property are to be grazed whilst being used as a Tree Farm, any impacted areas of environmental planting are to be suitably fenced to prevent livestock damage”.*

- Some compartment numbers and areas are duplicated (eg there two Compartment 2's at 50.1 hectares). Please review and confirm the total area of Compartment 2 is 50.1 hectares. **Updated on Map.**
- Compartment numbers 6 and 27 are not identified on the Operations Map. **Updated on Map.**
- Buffers mentioned to creeklines but not depicted on the Operations Map. **Now shown along creek lines on the Map.** The key on map still doesn't nominate buffer sizes.
- Habitable building buffer shown on Operations Map. Map should also note the 50 metre buffer to sheds. **Key on map indicates where the 50m and 100m buffers are plus refer to BAL evaluation.**
- Location of the container with a map should be shown on plan. **Fire tubes are to be placed at all main access gates to property. All main access gates are shown on map.**
- Suggest map insert with enlargement of house/sheds/powerlines or include as a second site plan enlargement. **Indicated on map and in the map key regarding buffers etc. Also depicted in the BAL evaluation provided with the application. This is discussed further below.**

- **Specific Scheme Requirements**

Clause 5.20 of the Scheme outlines specific provisions for plantations and agroforestry, as summarised in the table below:

TABLE 2 -

Item	Requirement	Applicant Comment
Clause 5.20.2 a) of the Scheme states that applications for the development of agroforestry and plantations are to be determined by the local government having regard to:		
Clause 5.20 a) (i)	The Code of Practice for Timber Plantations in WA	The Code of Practice is orientated towards plantations to be harvested. The application material has been prepared with regards to the Code (2014

		<p>edition) and the Guidelines for Plantation Fire Protection, 2016.</p> <p>Refer to separate comments on the Management Plan in Table 5.</p> <p>This plantation is intended to be thinned at age 10, thinned again at age 20 and then harvested at age 30.</p>
Clause 5.20 a) (ii)	Submission of plantation management plan in accordance with the protocol in the Code of Practice	Refer to separate comments on Management Plan in Table 5.
Clause 5.20 a) (iii)	The need to encourage the commercial production of trees which is of significance to the national, regional and local economy.	<p>This is an application for a commercial Tree Farm.</p> <p>Despite this proposal to reestablish a Tree Farm where there was previously a Tree Farm, the overall plantation estate in WA continues to be in decline.</p> <p>Timber for harvest is a critical type of farming, essential to the modern world, including the housing and construction industry. Tree Farms are a renewable resource, and they store carbon, which is also important in response to climate change and moving towards a low carbon future.</p> <p>It is widely acknowledged that substantial new investment is required to meet future timber demands. This is to stem the current decline in the overall plantation estate area, but ideally returning into a period of growth.</p> <p>This said, to meet projected future demand, the level of growth and estate area required is not expected to reach the high peaks of the late 1990's to mid-2000's.</p> <p>A useful resource that quantifies this decline and these structural shifts within the timber sector is the Australian Government Department of Agriculture, Fisheries and Forestry ABARES, available at <u>Plantation inventory and statistics - DAFF (agriculture.gov.au)</u></p>

<p>Clause 5.20 a) (iv)</p>	<p>The benefits of agroforestry and plantations in addressing land degradation including soil erosion and salinity.</p>	<p>Status of the subject land is overall considered to be good with very little to no erosion or degradation.</p> <p>In the lower lying areas in Compartments 10,11 & 30 there is evidence of salinity.</p> <p>At planting, these discrete areas will be identified and also planted to a native species more tolerant of salinity with intent to stem the salinity and rehabilitate these areas.</p> <p>Buffers and revegetation along creek lines is shown on map as well, as Environmental Plantings.</p>
<p>Clause 5.20 a) (v)</p>	<p>The role of agroforestry and plantations in protecting water quality and preventing adverse effects on ground water re-charge.</p>	<p>Growing trees is an acknowledged means to protect water quality and prevent adverse effects on ground water recharge.</p>
<p>Clause 5.20 a) (vi)</p>	<p>The location of the land in relation to land zoned for residential, industrial, commercial uses.</p>	<p>The lot is surrounded by rural zoned land and /or Local Scheme reserves for Recreation and Open Space.</p>
<p>Clause 5.20 a) (vii)</p>	<p>The suitability of the current and future road systems.</p>	<p>Harvest Plan not yet assessed.</p> <p>As per the Plantation Management Plan, a Harvest Plan will be provided at each harvest, and implemented in consultation with the Shire to manage temporary impacts on the local road network. This includes repair of damage reasonably attributed to the harvest operation.</p>
<p>Clause 5.20 a) (viii)</p>	<p>Any Local Planning Policy adopted by the local government.</p>	<p>See comments at Table 4</p>
<p>Clause 5.20 a) (ix)</p>	<p>Any objective of the Rural zone under Part 4.</p>	<p>The proposal complies with the objectives of the Rural zone in the Cranbrook Scheme as follows:</p> <ul style="list-style-type: none"> • A purpose of the Rural zone is to ensure the continuation of broad-hectare agriculture. <p>Tree farming is a form of broad acre agriculture.</p> <ul style="list-style-type: none"> • A further purpose of the Rural zone is to help protect rural land from

		<p>degradation and further loss of biodiversity including:</p> <ul style="list-style-type: none"> ○ Minimising clearing of remnant vegetation ○ Encouraging retention and protection of remnant vegetation ○ Encouraging vegetation corridors ○ Encouraging rehabilitation of salt affected areas ○ Encouraging soil conservation through land management measures <p>The proposed Tree Farm:</p> <ul style="list-style-type: none"> ○ Does not remove any existing vegetation; ○ Existing vegetation will remain and be planted around; ○ Appropriate species selection will occur in any saline areas; ○ Further, rehabilitation and environmental planting is proposed along creek lines. <ul style="list-style-type: none"> ● A further relevant purpose of the Rural zone is to promote the sustainable management of natural resources and the prevention of land degradation which the Tree Farm also achieves.
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- **State Planning Policy 2.5 Rural Planning**

There is a 'Section 5.6 – Tree Farming' under the current State Planning Policy 2.5 (SPP2.5) as summarised below:

TABLE 3 -

Item	Requirement	Proposal	Compliance
5.6	The WAPC policy in regard to tree farming is:		
(a)	tree farming is supported and encouraged on rural land as a means of diversifying rural economies and providing economic and environmental benefit;	The Shire's Local Planning Strategy recognises that there is a range of contemporary rural uses throughout the Shire.	Refer to final agenda item – revised Officer comment

(b)	tree farming should generally not occur on priority agricultural land;	The land is not identified as priority agricultural land.	Complies
(c)	tree farming should generally be a permitted use on rural land, except where development of a tree farm would create an extreme or unacceptable bushfire risk or when responding to specific local circumstances as identified in a strategy or scheme;	The Local Planning Strategy and / or Scheme do not identify any specific local circumstances.	Refer to final agenda item – revised Officer comment
(d)	local governments should manage the location, extent and application requirements for tree farming in their communities through local planning strategies, schemes and/or local planning policies;	The Shire has a Local Planning Strategy which recognises plantations as an existing agricultural activity with potential for expansion, as well as a Local Planning Policy for plantations.	<p>Complies - The Shire's Local Planning Strategy recognises at clause 5.1 that the predominant land use in the Shire is agricultural production.</p> <p>Tree farming is a form of broad scale agriculture / agricultural production.</p> <p>Further, the Planning Strategy states: "Commercial tree plantations are well established. There is potential for this land use to expand in the district as part of farm diversification or a single crop."</p> <p>As per earlier comments, the area of plantation estate across WA has been in decline. Any expansion of new Tree Farms, based on predicted future demand, is expected to be within the peak levels of the 1990's to mid-2000's noting the Planning Strategy was endorsed by the WAPC in 2016.</p> <p>Further, at clause 6.5 Natural Resource Management, the Local Planning Strategy states that plantations and</p>

			<p>forestry are recognised as means to manage water catchments, salinity, water quality and water logging issues, which are prevalent across the Shire.</p> <p>At Clause 8.1.9, the Shire also articulates its vision to expand the existing industrial area in Cranbrook as a Southern Link Transport Hub, envisioning that all grain will be transported to Albany through the Cranbrook strategic grain receipt point. This clause identifies need for diversified employment in the Shire.</p> <p>Similar ambition may be possible for diversification and reestablishment / growth within the plantation sector.</p> <p>Comments regarding the Shire's Tree Farm Policy are made at Table 4.</p>
(e)	<p>in planning for tree farming, local government considerations should include but are not limited to, potential bushfire risk, environmental and economic factors, water availability and recharge, visual landscape impacts, transport impacts of tree farming (where harvesting is proposed), planting thresholds, appropriate buffers, and location relative to conservation estates and sensitive land uses;</p>	Noted.	<p>Complies.</p> <p>The Plantation Management Plan has been prepared with regards to the Code of Practice and particularly the Guidelines to address relevant risk considerations. These are established, industry best practice operational management measures designed to address the listed issues.</p> <p>DBCA no objection, comments addressed in the Management Plan.</p>
(f)	<p>where tree farm proposals are integrated with farm management for the</p>	<p>This is not applicable as the proposed</p>	<p>Not Applicable.</p>

	purpose of natural resource management and occupy no more than 10 per cent of the farm, the proposal should not require local government development approval; and	plantation area exceeds 10%.	
(g)	the establishment of tree farms does not warrant the creation of new or smaller rural lots.	Noted.	Not Applicable.

- **Shire of Cranbrook Local Planning Policy No 1 – Plantations (LPP 1)**

Under WAPC's State Planning Policy 2.5, tree farming is clearly supported and encouraged on rural land. Likewise, the Shire's Local Planning Strategy, which articulates the importance of broad scale agriculture and aligned agricultural diversification as key land uses within the Shire.

Notwithstanding the above, SPP2.5 allows local governments to manage the location, extent and application requirements for tree farming in their communities through local planning strategies, schemes or local planning policies.

The Shires Scheme specifically references any Local Planning Policy adopted by the local government. The Shire referred it's Local Planning Policy to DPLH during public advertising, and DPLH confirmed that the Policy is generally consistent with SPP2.5.

Under the Shires Policy there is a general presumption against 'whole of lot' plantations in the Rural zone, unless a proponent can demonstrate to the Council's satisfaction that there are exceptional circumstances that warrant a variation in accordance with Clause 10.1.1.

Applicant overall comment on Local Planning Policy

A LPP is a 'due regard' document, it is not a rule.

An LPP does not have the same status as the SPP or the Scheme, arguably sitting beneath the Local Planning Strategy and Scheme in the decision-making hierarchy. An LPP is also adopted at the discretion of a Local Government, it does not follow the same authorisation process as a Scheme or Planning Strategy through the WAPC.

DPLH confirming that the LPP is generally consistent with SPP 2.5 is not endorsement of the applicability or validity of the policy to decision making.

There is contradiction between this policy and the SPP 2.5 and the Shire's Local Planning Strategy. Giving the LPP 'due regard' is problematic because of this. Tree Farming is a legitimate form of broad scale agriculture which the SPP 2.5, the Shire's Rural Zone purpose and the Local Planning Strategy all prioritise and encourage.

The LPP does not set out a rationale or planning reasons as to why this type of Tree Farm for harvest is undesirable, particularly against a backdrop of decline, of

regulation through a Code and Guidelines, or as superior as a mixed crop or using up only part of a farm rather than a whole farm.

Like the grain and livestock producers elsewhere in the Shire of Cranbrook, an economy of scale is required to be commercially viable and implement the risk and management measures required.

The main Policy requirements are summarised in the table below.

TABLE 4 -

Matters for consideration under LLP 1	Applicant Comment
<p>10.1 Continuing agricultural activities</p> <p>The policy is aimed at ensuring traditional agricultural activities such as cropping, grazing and food production remain the predominant land use with agroforestry or plantations as an ancillary and complementary use.</p>	<p>In giving due regard to this, it is apparent this statement is somewhat contradictory because Tree Farming is a form of broad scale agriculture and Tree Farm is an established, if not important broad acre agricultural land use in the Shire of Cranbrook.</p> <p>Agroforestry as a complementary means to improve soils and water quality alongside broad acre cropping and grazing is important, however Tree Farm at a commercial scale for harvest is different. Like other forms of broad acre agriculture, Tree Farm requires a commercial, whole of farm scale of operation.</p> <p>The subject land was formerly a Tree Farm. It has been used for a period of intervening time for traditional grazing of livestock, demonstrating Tree Farm is not a permanent land use change.</p>
<p>10.2 Location and compatibility with adjacent land uses</p> <p>The policy recognises that there should be separation to residential and rural residential zones, as well as premises which are sensitive to chemical spraying.</p>	<p>Not applicable</p> <p>The proposed Tree Farm is not adjacent to any residential or rural residential land.</p> <p>Firebreaks set the Tree Farm away from boundaries.</p>
<p>10.3 Environmental benefits</p> <p>There are already broad environmental benefits associated with plantations and the policy lists more specific examples of environmental matters that will be taken into account such as mitigating salinity, creating vegetation links / corridors, using local native plantings to protect water courses.</p>	<p>Complies</p> <p>As shown on the map, environmental planting is proposed along the creek lines.</p> <p>This is opportunistic and is considered to bring long term environmental benefit to the subject land.</p> <p>In addition, there are some areas of salinity identified. During planting, these</p>

	<p>will be planted with species to remediate and manage these areas.</p> <p>The subject land was formerly a Tree Farm. Tree planting is considered compatible with good land management, including managing soil and waterway health.</p>
<p>10.4 Code of Practice for Timber Plantations in Western Australia (as amended)</p> <p>This Policy does not attempt to reiterate all of the requirements in the Codes of Practice however they should be addressed by each applicant.</p>	<p>Complies, discussed separately in Table 5.</p>
<p>10.5 Fire Management Plans</p> <p>The draft policy seeks to outline minimum requirements for fire management plans and ensure that they are comprehensive. It also requires FMP to be compiled by a qualified fire consultant as many are compiled by consultants who do not have fire expertise.</p>	<p>Complies, discussed separately in Table 6</p>
<p>10.5.1 Bushfire Attack Level (BAL) Assessment</p> <p>Relevant to this application, the Policy requires a BAL for any existing habitable dwelling.</p>	<p>Complies, discussed separately below</p>
<p>10.6 Water Quality and buffers to water bodies</p> <p>The Policy recommends buffers a minimum buffer of 30 metres to permanent water streams where the landowner uses a combination of practices to protect water quality.</p> <p>Reduced buffers can be considered where (for example):</p> <ul style="list-style-type: none"> - Development will result in significant revegetation of creek lines using local endemic species. - The applicant demonstrates environmental benefits 	<p>Complies</p> <p>Traditional agriculture is a P permitted land use with no regulation under the Scheme concerning environmental management of waterways. A 10-metre-wide buffer is proposed along creek lines and existing vegetation on site is retained, which is considered a positive and acceptable environmental benefit.</p> <p>In addition, once the Tree Farm is established, there may be opportunity for some grazing of livestock to occur. See other comments concerning this.</p>
<p>10.7 Plantation Management Plan</p>	<p>Complies, discussed separately in Table 5.</p>
<p>10.8 The suitability of the current and future road systems (for harvesting only).</p>	<p>Complies.</p> <p>This is a former plantation that was harvested, in an area with other long term existing plantations. Harvesting has</p>

	<p>temporary impact on the local road network but as per the Plantation Management Plan, a Harvesting Plan will be submitted to shire prior to any harvesting taking place on the property to temporarily manage this.</p> <p>The Plantation Management Plan sets out commitments with regards to traffic management and any road damage attributable to the temporary harvest.</p>
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The applicant is seeking a variation to the Shires Local Planning Policy No 1.

The Policy states that *'Council will have regard for any specific circumstances where a variation to this criteria 10.1 may be warranted, however in those cases the onus will be on the applicant to demonstrate the particular merits of a proposal or justification for an assessment on a 'whole lot' basis'*.

Applicant comment:

This language of “variation” to the LPP is queried. The LPP is a due regard document, it is not a rule like the R-Codes or Scheme requirements that can be varied. Regard can be given to the LPP, but it is not being varied as such.

It is also arguable, if not queried, about the level of change implied in the Officer commentary as disadvantageous to this application around changes in the planning framework since this property was originally established as a Plantation.

The land use is discretionary, and this does not seem to have changed since the current, and original Shire of Cranbrook Scheme was gazetted back in 2004. 2004 was around the peak time for Blue Gum planting across WA, when the legacy impacts that seem to still taint were being felt. Since this time, the plantation estate in WA has been in considerable decline, the industry has restructured and both the Code and the Guidelines relative to plantations have been adopted and then reviewed.

The Shire’s Local Planning Strategy was endorsed in 2016 and this supports Tree Farm, even anticipating expansion of Tree Farms in the Shire.

What has occurred, is the Shire has chosen to recently adopt an alternative policy position about Plantations. The basis and planning rationale for this LPP position, and in context of an SPP and Local Planning Strategy that share a different higher order direction, is the only shift that has occurred. This is arguably not a change in the overall planning framework that applies, just a shift in local preference.

In terms of the LPP, without rationale and evidence explained in the LPP to support its position, it is difficult to provide an alternative view, only a position that the policy principle is applied and given regard, but ultimately not concurred with.

Necessity or benefit of limiting land area under plantation to only part of a farm, which seems the underlying position of the policy, is not set out and is considered unfounded.

Likewise excessive regulation of the operations which are typical to any broad acre agricultural operation that grows plants, and in an industry which is regulated through regularly reviewed, authorised Code and Guidelines also seems unfounded.

The Plantation Management Plan as per the Code and Guidelines regulates the land use. This is required for certification, and it manages the Tree Farm operation, particularly implementing a fire risk management regime that was developed as best practice with DFES. If there is more detail required to what is set out in the application, this can be readily addressed via (reasonable and relevant) conditions.

The land is zoned Rural and Agriculture Extensive is a P use. My client has sought to use the whole farm for Plantation because it is suited to growing trees, a type of broad acre agriculture. They have undertaken their own soil testing analysis and site visits to determine this. The suitability to grow trees here is a commercial decision and risk to be born by my client, it does not require a Land Capability report to justify this. There is no planning reason expressed why plantation, a type of broad acre farming, should only occur in areas that are not suited to other types of broad acre farming.

In addition, the operation protects existing vegetation, it is setback from waterways, and it manages the areas that have salinity, with ability to turn back in the future to other forms of agriculture.

- *Plantation Management Plan*

TABLE 5 -

Timber Code of Practice	
Appendix 1 Protocols for Management Plan	Applicants Comments
<p>A Plantation Management Plan may include the following:</p> <ul style="list-style-type: none"> - A plantation map - An establishment plan - A maintenance plan - A fire management plan 	<p>Complies.</p> <p>The plantation is a considerable economic investment and the operator desires to protect its investment through suitable, ongoing management and maintenance.</p> <p>If there is more detail desired to the material lodged, this can be readily addressed via (reasonable and relevant) conditions.</p> <p>Some of the matters set out in the Code are industry operational matters, they are not relevant land use and planning considerations.</p>
Plantation Management Plan, 3.0 Plantation Establishment Plan	
<p>3.3 Control of Vermin and declared weeds</p>	<p>Complies.</p> <p>Like any farming operation, it is contingent on the operator to protect its investment through vermin and weed management.</p>

	<p>If there is more detail desired, this can be readily addressed via (reasonable and relevant) conditions.</p> <p>It is noted the plantation will be continuously managed and inspected routinely with management actions occurring on site as required. The existing house is expected to be leased and under this arrangement the tenant may also have responsibility to caretake.</p>
3.6 Direction of Planting Lines	<p>Complies.</p> <p>This is at the developer's discretion, determined at planting noting the land is largely undulating. Any steep area will be ripped and planted across the slope.</p> <p>This is an industry operational matter, it is not clear how this might be a relevant land use and planning considerations in this DA.</p>
3.7 Description of soil preparation methods	<p>Complies.</p> <p>Burning of paddock stubble is possible. Typically, after ripping a pre-emergent together with a knockdown herbicide is applied as listed in Plantation Management Plan.</p>
Plantation Management Plan, 4.0 Plantation 'Tending' (Maintenance) Plan	
4.1 Grazing Strategy	<p>Complies.</p> <p>It is not necessary to fence areas of environmental planting within a plantation operation because plantation does not involve grazing of livestock. Routine vermin management will occur.</p> <p>There is potential for the property to be grazed by livestock once the plantation is established. As part of such a lease arrangement, any potentially impacted areas of environmental planting would be required to be appropriately fenced to keep their livestock out of these areas whilst the grazing occurs.</p> <p>A condition to this effect is accepted.</p>
4.4 Weed Management	Complies.

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In addition to the above, the Shires Local Planning Policy states that 'Any Management Plan must include:

1. Clear, regular scheduled and mandatory inspections;
2. A rigorous ongoing maintenance regime with identifiable triggers, clear maintenance actions and measurable outcomes (particularly for weed control, vermin control, feral animal control and general pest control);
3. A procedure to notify neighbours in writing prior to any proposed spraying.
4. A complaint handling procedure

Can be addressed by (reasonable and relevant) condition of approval. A stakeholder register is kept by my client, and their certification includes a complaint handling mechanism. Similar to other comments above, some of these matters appear to have minimal nexus to land use planning considerations.

- **Bushfire Management Plan – DFES Guidelines for Plantations Protection**

TABLE 6 -

Plantation Management Plan, 5. Bushfire Management Plan		
Item	Guideline	Applicant Comments
2.1 External firebreaks and setback distances	50 metre minimum between any non habitable structure (shed) and plantation 100 metre minimum between any habitable structure and plantation	Complies.
2.2 Fuel Reduction	Fuel reduction is encouraged where possible taking into account factors such as remnant vegetation, management techniques, and natural features. The Guideline lists methods available for managing fire breaks.	Complies. This is a considerable economic investment and fire risk management is central as per the Guidelines and the Plantation Management Plan.
3a.	Landowner and / or occupier information, contact details and 24 hour fire contact number.	Complies. The Landline number diverts 24/7 to the person on duty. There is a fire roster of BFE staff and this can be circulated to relevant brigades. BFE and the Shire of Cranbrook is a signatory to the FIFWA Fire Managers Agreement. This is a considerable resource arrangement amongst

		<p>FIFWA members, DFES and DBCA to provide a shared response to fire emergency within and near to plantation estate.</p> <p>Details of the MOU are provided.</p>
3b.	Contact details of local fire control agencies	<p>Complies. Provided in a table on Page 8.</p>
3c.	A fire fighting equipment register and details of any co-operative arrangements.	<p>Complies. Provided on Page 9 and 10.</p>
3d.	Plantation species, area and layout including compartment size.	<p>Complies. Provided on development application map</p>
3e.	<p>Fire protection measures such as:</p> <ul style="list-style-type: none"> a) Fire detection and reporting mechanisms. b) Initial response and attack of fires c) Potential ignition sources. d) Access in and around the plantation. e) Clearly signed access roads. f) Methods of firebreak maintenance. g) -Measures to protect services (eg powerlines). h) Water supplies and capacity i) Surrounding vegetation type, age since burnt and if the site is being effectively managed (if available) j) Sites fire history, where available. k) Harvesting procedures and other measures used to reduce hazards (eg slashing, thinning). l) - Fuel reduction 	<p>Complies.</p> <ul style="list-style-type: none"> a) Fire detection and reporting mechanism is outlined in 5.5 b) Initial response and attack of fires is outlined in 5.7.. c) Potential ignition sources. Outlined in 5.4. d) Access in and around the plantation. Provided via 15m perimeter fire breaks and 6 metre internal firebreaks. e) Clearly signed access roads. Shown on the map. f) Methods of firebreak maintenance. Firebreaks as per DFES Fire Guidelines and shire fire break notices. g) Measures to protect services (eg powerlines). A powerline is shown on the site plan and under 5.10 discusses a 15m break either side. Setback to powerlines is 20m and shown on the map. h) Water supplies and capacity. Numerous dam sites on property. Water tank near main homestead will be kept full at all times over fire season i) Surrounding vegetation type, age since burnt and if the site is being effectively managed (if available). BFE available to assist adjoining landowner to manage their fuels j) Sites fire history, where available. Fire history is not

	programme if applicable such as herbicide use or grazing.	known but BFE would like to be made aware of this. k) Harvesting procedures and other measures used to reduce hazards (eg slashing, thinning). See earlier comments. - Fuel reduction programme. Refer to Management Plan.
3f.	Surrounding local features including existing plantations, proximity to towns, remnant vegetation and significant values relevant to the site.	See Plantation Management Plan. Context was considered when selecting this site.
3g.	A plantation map to be held in suitable containers and clearly signposted at the main property entrances and other locations approved by the local government.	Refers to maps in a water proof canister at the access on Wingebellup Road.
3h.	Fire compartment maps will indicate: - Compartment boundaries and sizes - Water supplies including dams - Emergency access/egress (firebreaks) - Structures - Significant features such as remnant vegetation	Plantation map shows firebreaks, water points, and compartment areas as well as a house and sheds.
4.1 Compartment size and layout	- Compartments should be no more than 30 hectares where possible or as prescribed by the local government. - Compartment boundaries should follow roads or natural features. - Fuel loads management techniques should be considered such as slashing between rows or grazing. - Topography, slope, access to water etc should be considered. - The layout should ensure that firebreaks are maintained sufficiently	Compartments comply as per Map. All firebreaks, including those with bends, are required to be accessible for all types of emergency fire vehicles and will be constructed accordingly. Topography and slope outlined in the Plantation Management Pan. slope.

	for emergency service access.	
4.2 Fire breaks and access	<ul style="list-style-type: none"> - Fire breaks to be as per the local government fire notice. - Vehicle access to be maintained in the planting layout. - Where possible tracks should be aligned to provide straight through access at junctions. - Access lanes must allow one line of traffic with passing areas where possible. Passing bays are recommended at 200m intervals (20m long by 6m wide) - The minimum trafficable surface must be 6 metres. - There must be horizontal and vertical clearance for vehicle access. 6m horizontal 	<p>Passing Bays are provided every 200m as per DFES Guidelines.</p> <p>Report states there will be 15 metre external firebreaks and 6 metre internal firebreaks.</p>
4.3 Water Supplies	<ul style="list-style-type: none"> - A 50,000 litre minimum to be permanently available with suitable fittings - Water supply to be designed and constructed so that heavy duty water firefighting equipment is able to access the supply. - Water supply to be shown on a plantation map and signposted in the field. 	<p>Plantation Management Plan sets out water supply and how the water can be accessed.</p>
5. Equipment and training	<p>The Guidelines discuss that it must be possible for every plantation manager to attend a fire on their own plantation.</p> <p>The Guidelines discuss:</p> <ul style="list-style-type: none"> - ensuring that any personal have adequate training - Machinery to be fitted with fire extinguishers. 	<p>The Shire is signatory to the FIFWA Fire Managers Agreement. First response is typically local, backed up by BFE Staff and volunteers</p> <p>BFE register with SMS Service provided by shire during fire season and all machinery movement bans and fire bans will be adhered to.</p>

	<ul style="list-style-type: none"> - Fire fighting equipment to be maintained in good working order. - Adhere to harvest bans 	
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- ***Fire Management Plan – Shire Local Planning Policy***

This matter is largely addressed by comments above in Table 6.

Other applicant comments

The dwelling exists, and the separation of 100m is demonstrably satisfied.

The application is accompanied by a BAL certificate that was prepared by a BPAD accredited bushfire practitioner. The Plantation Management Plan was prepared by a suitably qualified and experienced forester working within an established, certified plantation business.

Whilst this does not negate risk of bushfire impacts on the dwelling, it satisfies both the Guidelines and SPP3.7 – planning in bushfire prone areas. Other than the single dwelling, SPP3.7 does not apply to this proposal.