

**liz**

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**From:** Kanella Hope <kanella@plannedfocus.com.au>  
**Sent:** Friday, 2 August 2024 1:51 PM  
**To:** liz; Linda Gray  
**Cc:** Jo Scott; Brett Scott  
**Subject:** FW: Bokerup Road plantation in Frankland River - TPI  
**Attachments:** Bokerup Road Operations Map V005 - 20240715.pdf; Scanned FIFWA signatories to the DFES-FIFWA Fire Managers MOU.pdf; MOU.pdf; Submissions for Applicant PF comments 2 Aug.docx; Officer Comments - Informal feedback to Applicant \_PF comments 2 Aug.docx

Hi Linda & Liz,

Thanks Liz for your preliminary comments on this DA. I have replied to these in the attached documents, which includes a table for the submitters and agency comments received. I also attach a copy of the FIFWA Fire Managers agreement which Cranbrook are signatory to.

Other than this, I would also like to set out the following summary of my client's position:

- My client does not have any other Tree Farms existing or proposed in the Shire of Cranbrook. This Tree Farm will be managed in conjunction with ones they have in other shires close by.
- Mitsui are a very large company, and they own/operate Bunbury Fibre Exports (BFE). They have been operating in the South West for a long time, including operating the BFE Chip Mill since 2011. Mitsui is a private company and they will own the land. Mitsui is not an investment fund and neither do they contract out management of their plantations to other parties.
- Tree Farm is a discretionary D use under the Scheme and this is a type of broad acre agriculture, with broad acre agriculture recognised as the key land use in the Shire of Cranbrook. Continuing this, in all its diverse forms, is considered highly desirable. In addition, growing trees for harvest is a renewable resource with importance as we move towards a low carbon economy.
- Whilst the Shire has not received many Tree Farm applications recently, arguably this is because of broader decline and restructure in the Tree Farm industry. There is concern that if this ongoing decline is not stemmed, future demand for timber products, essential in the housing and construction industry as well as others, will not be met. This said, the area of new estate planting that is anticipated to meet this demand does fall well within the former estate peak of the late 1990's to mid-2000's.
- I believe it is coincidence and not the flood gates opening for the Shire to have received this application and the second one recently. Even several more than these two is not opening the flood gates compared to land area available in the Shire.
- Tree Farming to harvest the timber is highly regulated, particularly to meet certification and quality standards. These obligations tie to the Code of Practice as well as the Guidelines for Plantation Fire Protection. Managing fire risk and operating to ensure the health of the tree's as they grow is critical to the commercial viability of any Tree Farm, it is intrinsic in how they operate.
- The Guidelines in particular were developed with DFES and are considered to be industry best practice concerning fire risk management. Whilst the Code was specified in the Scheme many years ago, this is a parallel industry Code. Unlike the Guidelines, whilst the Code is useful for information, it is less aligned to DA considerations.

- The subject land is a former blue gum plantation. The land has been used for traditional agriculture before and since the last Tree Farm was harvested. Although a long growth rotation, Tree Farm for harvest is not necessarily a permanent land use change.
- Like most enterprises, an economy of scale and efficiency is required to be commercially viable. Unless they are exceptionally large properties, which are typically rare in areas suited to growing trees for harvest in WA, it is generally not commercially viable to operate Tree Farms for harvest as part of a mixed farming operation. It is unclear to me the benefits of encouraging a mixed operation. The Shire's LPP does not set out a planning rationale for its preference. This also seems disadvantageous to the traditional farming on the balance of the land.
- The impacts and legacy of the former Blue Gums schemes is well understood, including in places like Rocky Gully. This history cannot be reversed, including by discouraging contemporary viable plantation agriculture now. Perhaps the sector needs to work on image and grow communities' knowledge of what they do, because there does seem to be widespread misunderstanding about Tree Farms. The industry is regulated and essential. I am yet to see current evidence that substantiates these concerns.

## Conclusion

Overall, and whilst my client appreciates the Shire's preferences in the LPP, the LPP is a due regard document. Having given it due regard, there is no planning basis to reduce the footprint of the proposed Tree Farm, or to refuse it. There is also suitable reassurance available in the Plantation Management Plan, if not reinforced by reasonable, relevant conditions of approval.

I am available to discuss draft conditions with you.

Kind regards,

Kanella

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*Director + Principal Planner*  
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**Planned F o c u s** 

Town planning  
& strategy

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**From:** liz <[liz@tخطيط.com.au](mailto:liz@tخطيط.com.au)>  
**Sent:** Friday, July 5, 2024 4:58 PM  
**To:** Kanella Hope <[kanella@plannedfocus.com.au](mailto:kanella@plannedfocus.com.au)>  
**Cc:** Linda Gray <[ceo@cranbrook.wa.gov.au](mailto:ceo@cranbrook.wa.gov.au)>; Jo Scott <[jo.scott@cranbrook.wa.gov.au](mailto:jo.scott@cranbrook.wa.gov.au)>  
**Subject:** Bokerup Road plantation in Frankland River - TPI

Good Afternoon Kanella,

Please find attached preliminary comments on the abovementioned application.

I emphasise these are informal comments at an officer level only, and do not reflect the opinion of any Shire Councillor.

As you are aware, a formal agenda item will need to be referred to a future Council meeting for determination.

The Shire has received some additional neighbour objections as per the updated attached word document.

I thought the attached article may be of interest to you.

Regards,

Liz Bushby  
Town Planning Innovations  
Consultant Planner for Shire of Cranbrook  
Mobile: 0488910869

*Please be advised that all emails are sent to the Shire for recording purposes.  
I can be contacted between Tuesday and Friday.*