

PROPOSED PLANTATION - LOT 12667 (No 7691) MUIR HIGHWAY, FRANKLAND RIVER

The purpose of this advice is to provide feedback at an officer level only. A formal report will be referred to a future Council meeting for determination.

• **Context**

The subject land was formerly a blue gum plantation. This plantation was established back in the mid 1990's, prior to the current Planning Scheme being gazetted in 2004. This plantation occupied approximately 80% of the property for purpose of tree farm.

This tree farm was harvested in approximately 2016, so 8 years ago. In the intervening time, the land has been used once again for grazing of livestock and some cropping.

Allowing for a period of rest between rotations is accepted agricultural practice however we concur 8 years is too long to rely on the non-conforming use provisions of the Scheme which do allow for uses established prior to the Scheme being gazetted to continue.

This said, this former tree farm use for over 20+ years, on 80% of the property, demonstrates several key factors relevant to this application:

- Tree farm is not a permanent land use change away from cropping and grazing.
- The subject land is suited to broadacre tree farm agriculture.

The lot is near to the local government boundary shared with the adjacent Shire of Manjimup.

The lot partially surrounds Reserve 26681 which has an area of 150 hectares. Reserve 26681 is known as the Cobertup Nature Reserve.

There appears to be a number of existing plantations in the immediate surrounds, based on aerial photography.

The Shire has referred the application to DWER, DBCA, DPLH, the Department of Mines, Industry, Regulation and Safety, Main Roads WA, and the adjacent Shires for comment.

• **Compartment Sizes / Operational Map**

The Operations Map divides both lots into different compartments which is summarised in Table 1.

TABLE 1 -

Compartment Number	Compartment Area in hectares
1	17.8 ha
2	17 ha
3	19.7 ha
4	14.3 ha
5	16.5 ha
6	28.3 ha
7	27.5 ha
8	23.1 ha

9	12.2 ha
10	10.8 ha
11	29.5 ha
12	18.7 ha
13	23.1 ha
14	29.1 ha
15	10.1 ha
16	15.1 ha
17	20.9 ha
18	27.4 ha
Total Compartment Area	361.1 hectares

Officer Comment:

- Compartment Plan is clear and shows water points, gates, access, fire map location, remnant vegetation, existing bluegums, and proposed planting areas.
- Firebreaks have sharp corners – not clear if any passing bays are proposed and to what level they will be trafficable. The applicant has submitted a plantation Development Application incorporating the DFES Guidelines for Plantation Fire Protection document. The Guidelines will be implemented (where appropriate) in the establishment of the plantation. Firebreaks have been designed where possible, to run either North – South or East – West and be straight to ensure line of site is maintained in a fire event. They are sufficient in width (both 15.0 metre and 6.0 metre firebreaks) to allow unabated two way vehicle movement around the periphery and within the plantation area. In regard to trafficability, firebreak management will be in accordance with item 4.2 of the Guidelines.
- No fencing is shown on map. Please clarify if there is existing lot boundary fencing and if any further internal fencing is proposed (eg along creeklines/ existing remnant vegetation or new kangaroo proof fencing). The cadastral property boundary is fully fenced. There are no internal fences that are planned for retention.
- Management Plan cites a 348 ha area is awaiting planting. The Site Plan shows the total compartment area is 361.1 hectares. Please clarify the area awaiting planting. 361.1 hectares.
- Buffer distances to creeklines not denoted. Buffers of remnant vegetation and watercourses are a minimum of 6 m as denoted in the forest management plan.
- Different types of firebreaks not denoted by different colours on site plan. It is possible to alter the map to reflect firebreak width variations however, there is sufficient detail on the map to determine firebreak width differences already.
- Not clear which dam is the most reliable 'summer' dam which is mentioned in the fire management text. Most reliable dam on the property is located with section 13 in Attachment 1 of the forest management plan. Further details can be found in Section 17 of the Fire Management Plan.

- **Zoning and Land Use Permissibility**

The lot is zoned Rural under the Shire of Cranbrook Town Planning Scheme No 4 ('the Scheme'). Clause 4.2 of the Scheme outlines the objectives of the Rural zone.

The proposed land use is construed as a plantation defined in the Scheme as 'has the same meaning as in the *Code of Practice for Timber Plantations in Western Australia* (1997) published by the Department of Conservation and Land Management and the Australian Forest Growers.'

The Timber Code of Practice defines a plantation as 'a stand of trees of ten hectares (or as defined by the Local Government Authority), or larger, that has been established by sowing or planting of either native or exotic tree species selected and managed intensively for their commercial and/or environmental benefits. A plantation includes roads, tracks, and firebreaks.'

A plantation is listed as 'D' use in Table 1: Zoning Table under the Scheme which 'means that the use is not permitted unless the local government has exercised its discretion by granting planning approval.'

- **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	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	<p>The Code of Practice is orientated towards plantations to be harvested.</p> <p>Complies.</p> <p>The application material has been prepared with regards to the Code (2014 edition) and the Guidelines for Plantation Fire Protection, 2016.</p> <p>The Code is not prescriptive, and neither was it developed with intent to be used to guide DA decisions under a Scheme.</p> <p>The purpose of this Code is to</p> <p><i>"provide <u>goals and guidelines</u> to plantation managers so that plantation operations in Western Australia are conducted in a manner that is in accordance with <u>accepted principles for good plantation management</u>, whilst recognising that a primary aim of plantations is to be economically competitive and sustainable. Principles for good plantation management are described in <i>Forest Practices Related to Wood Production in Plantations: National Principles</i> (1996) and <i>National Water</i></i></p>

		<p><i>Quality Management Strategy: Policy and Principles (1994).</i></p> <p>Refer to separate comments on Management Plan in Table 5.</p>
Clause 5.20 a) (ii)	Submission of plantation management plan in accordance with the protocol in the Code of Practice	<p>Complies</p> <p>Refer to separate comments on Management Plan in Table 5.</p>
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>The application has a form of commercial value to the owner, however they need to demonstrate that the plantation will be well managed (maintenance and bushfire management), and address the Shires Local Planning Policy.</p> <p>Complies.</p> <p>Timber for harvest is a critical type of broadacre 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 expectations for a low carbon future.</p> <p>It would be inappropriate to shift focus of this clear Scheme provision to management or operational considerations.</p> <p>To clarify, the owner is only undertaking the plantation development for the commercial production of trees. The commercial value is in no manner different than other permitted uses such as grazing or cropping. Like other land uses, it is in the interest of the applicant to manage the plantation appropriately to maximise the commercial outcome in accordance with the bio-physical and regulatory constraints.</p> <p>Please refer to covering letter with respect to further evidence of economic importance. Refer to table in section 7 Silviculture and Monitoring, Section 8 Fire Management and the Fire Management Plan. Note, the applicant also has an obligation to comply with the Shire of Cranbrook's Annual Firebreak Notice.</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>The applicant broadly discusses, but has not provided any substantial information addressing land degradation, erosion or salinity.</p> <p>Complies. It would be unrealistic to suggest or interpret this clause as meaning a tree farm can only occur on degraded land.</p> <p>The subject land is considered to possess a suitable profile upon which to plant a commercial tree farm, evident by its former use for this purpose. Likewise, tree farm is not a permanent land use change, but a cycle of broadacre agriculture that can revert to other forms of agriculture over time.</p> <p>In addition, land degradation, erosion and salinity associated with the existing agricultural land use is extremely well documented.^{iiiiiv} Furthermore, it is also extremely well documented that the planting of trees and plantations with careful design and management as contemplated in the forest management plan can assist in mitigating and potentially reversing the adverse impacts of land degradation that has been primarily caused by traditional agriculture such as salinity^{vi}. Please see salinity survey map provided.</p> <p>Some aerial photography is provided and salinity is mentioned. Degraded water courses are mentioned but no site photos or evidence is provided. The imagery is over an extended timeline and explicit in identifying exactly the degraded area. These show the salinity at a scale much better than oblique site photos. The removal of livestock and establishment of the plantation will allow for the natural recruitment of native vegetation in waterways and buffer areas. The presence of native vegetation and plantation will have a positive impact on water quality and soil salinity. There is no requirement for additional “environmental plantings”.</p> <p>The application refers to removal of livestock to assist with recovery of</p>
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		<p>riparian plant species along water courses.</p> <p>Recommend applicant expand on existing physical features and unsuitability of the lot for more traditional agricultural uses as outlined in the Shires LPP. Salinity is becoming more evident since a previous tree crop established over the property, has been harvested and the land reverted to traditional agricultural grazing practices. This is evident by an increase in barley grass and associated salt scald outbreaks that drain towards natural vegetated waterways that feed into the Cobertup Nature Reserve. As per the references in the endnotes, the plantation will assist in mitigating existing land degradation and at a minimum prevent worsening of the salinity, which will ultimately conserve the land for future agricultural or plantation purposes. Please see salinity survey map.</p> <p>Site photographs, for example, can be provided of salinity affected areas. The aerial imagery is a better representation of the salinity affected areas. Oblique site photos will not show the extent. .</p>
Clause 5.20 a) (v)	The role of agroforestry and plantations in protecting water quality and preventing adverse effects on ground water re-charge.	<p>As per above. There is some information that parts of the lot are salinity affected.</p> <p>Complies</p> <p>See above and note minimum setback distances from native vegetation and watercourses.</p>
Clause 5.20 a) (vi)	The location of the land in relation to land zoned for residential, industrial, commercial uses.	<p>Complies</p> <p>The lot is surrounded by rural zoned land and /or Local Scheme reserves for Recreation and Open Space.</p>
Clause 5.20 a) (vii)	The suitability of the current and future road systems.	<p>A Harvest Plan has not been provided.</p> <p>Complies</p> <p>It is premature to provide a Harvest Plan now, when the first harvest will not occur until 12-15 years.</p> <p>As per the forest 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</p>

		<p>reasonably attributed to this harvest operation.</p> <p>A Haulage Rute Plan has been provided and has been referred to MRWA. We can upgrade the entrance of Muir Highway as proposed by MRWA in their response. Further consideration can be made in the Harvest and traffic management plan proposed to be provided prior to harvest. .</p>
<p>Clause 5.20 a) (viii)</p>	<p>Any Local Planning Policy adopted by the local government.</p>	<p>The applicant has not lodged information substantially addressing variations to Local Planning Policy No 1 – refer to separate comments on LPP in Table 4. Limiting the plantation to 30-35% of lots and to specific areas not suitable for agriculture due to their limited agricultural capability does not appear based on any reasonable planning rationale, and in addition, it is not commercially viable for plantation enterprises and anti competitive. A lack of commercial viability for plantations is contrary to the intent of clause 5.20 a) (iii) of the local planning scheme. 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 objectives of the Rural zone are broad, however the main issue is the variations proposed to Local Planning Policy 1. The Shire's Policy aligns with the rural zone objective to ensure continuation of broad hectare agriculture in the district.</p> <p>Complies</p> <p>Tree Farm is a form of broadacre agriculture.</p> <p>The establishment of a plantation will likely improve and at a minimum preserve the land for future broadacre agriculture. Plantation and agricultural land uses are interchangeable as evidenced by the ABARES data in our covering letter. In addition, the land surrounding the proposed plantation development is already established to softwood and hardwood plantations as an acceptable land use.</p> <p>Further, we agree with the BFE commentary about the Rural Zone they set out in their application material</p>

		<p>included in the August Council meeting Agenda / minutes, 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 degradation and further loss of biodiversity including: <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 does not remove any existing vegetation; existing vegetation will remain and be planted around; appropriate species selection will occur in any saline areas; <u>further, rehabilitation and environmental planting is proposed along creek lines – confirm if extra environmental planting will occur.</u></p> <p>A further relevant purpose is to promote the sustainable management of natural resources and the prevention of land degradation which the Tree Farm also achieves.</p> <p>The zone objectives do not preclude Council from supporting Policy Variations based on the individual merit of an application.</p>
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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.	Complies.
(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.	Complies.
(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;	<p>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> <p>The Scheme makes reference to a Local Planning Policy for plantations.</p>	<p>Variations. The application does not comply with the Shires Local Planning Policy.</p> <p>Complies – We agree with the BFE commentary about this set out in their application material included in the August Council meeting Agenda / minutes, as follows:</p> <p>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.</p>

		<p>Further, the Planning Strategy states: <i>“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.”</i></p> <p>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 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</p>
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			<p>Albany through the Cranbrook strategic grain receival 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 with regard to the Shire's Tree Farm is 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>The subject land is near to existing reserves so the Shire is waiting for feedback from DBCA. Note the DBCA had no objection to the Tree Farm noting this was also abutting reserve land.</p> <p>Bushfire management, water availability and buffers are all relevant considerations. The design and implementation of buffers and setbacks prescribed in the Code of Practice and Plantation Fire Protection Guidelines have considered the risks and potential impacts of plantations on neighbouring land uses. We note DWER's response to the development application and</p>

			<p>their comments on requiring and nutrition and irrigation management plan. The property is subject to annual inputs of phosphorus and nitrogenous fertilisers. We will be undertaking soil and foliar tests to determine the requirement for any fertiliser applications. Our experience suggest we will not need to use any fertiliser at establishment and during maintenance of the plantation on this property. Furthermore, trees have developed mechanisms quite different to short-rooted annuals to deal with pulses of nutrient availability. Nutrient cycling in forests is highly conserved unlike short-rooted annual species found in cropping and pasture. The DWER officer should be aware of nutrient, water and carbon cycles of deep-rooted perennials and the benefits they provide when compared to short-rooted annuals such as pasture species. Furthermore, the principles behind buffers and setbacks described in the Code of Practice have been considered for the</p>
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			use of chemicals and fertilisers in plantations and the setbacks (minimum 6 m) is deemed appropriate to minimise the risk of chemical or nutrient run-off from the plantations on to adjacent land uses. Additional buffers can be considered in a nutrient management planning undertaken prior to fertiliser application.
(f)	where tree farm proposals are integrated with farm management for the 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	This is not applicable as the proposed plantation area exceeds 10%.	Not Applicable.
(g)	the establishment of tree farms does not warrant the creation of new or smaller rural lots.	Noted.	Statement only.

- **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. Similar is the Scheme provisions at Clause 5.20. These are not geared towards discouraging or preventing tree farms.

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.

The main Policy requirements are summarised in the table below.

Comment on the Shire's Local Planning Policy:

We understand a Local Planning Policy is a 'due regard' document. It is concerning that this document does not seem to set out any planning reason as to where the preference for 30% only tree farm has come from and why it is superior, or how this works in reality when an economy of scale is required for both tree farm as well as traditional cropping and grazing operations.

The existing tree farm formerly occupied 80% of this property, and it did so successfully for 20+ years.

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.

Tree farm is not likely to establish across a lot of the Shire of Cranbrook however this western area in Frankland River does have suitable characteristics, which is why historically tree farms have occurred in this locality.

TABLE 4 -

Matters for consideration under LLP 1	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>Variation sought.</p> <p>The applicant is seeking to plant approximately 76% of the lot for plantation purposes.</p> <p>It is noted that the applicant has advised that the lot was used as a plantation until 2016, so the use has been ceased for 8 years.</p> <p>It is not clear whether the previous plantation was established prior to the Shires current Scheme, when the previous plantation was harvested, and what most of the lot was used for since the last plantation. Recommend applicant provide more detail and Shire can check for any historic records.</p> <p>Complies.</p> <p>A local planning policy is also a due regard document. It is incorrect to state a local policy is prescriptive and has to be 'varied'.</p>

	<p>Tree farm is a form of broadacre agriculture well established in the Shire, particularly in this area around Frankland River.</p> <p>The applicant does not have access to the requested information other than being able to access/provide dated satellite imagery. The Shire should have appropriate or access to records particularly regarding the scheme pursuant to which the previous plantation was established.</p> <p>Please refer to the revised local context map which shows the development will result in the infilling of plantations use within the locality rather than an extension into adjoining areas.</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>Waiting advice from DBCA on adjacent reserves</p> <p>Complies.</p> <p>Tree farming is not a complex or intensive broadacre agriculture. Unlike short rooted perennial crops, constant intervention, including with chemicals is limited, with management limited to weed and vermin control as necessary, and importantly, maintenance of firebreaks and fuel loads.</p> <p>The Code and Guidelines are also embedded with industry best practice, incorporating a raft of third-party legislative requirements, all geared towards good management and minimising any impacts outside of the property.</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>The applicant makes some references to protecting existing creek lines. The width of any protection buffer is not clear. No revegetation is mentioned. Buffers and setbacks are clearly defined in Section 4 Property Description and are visually represented in Attachment 1 of the forest management plan and are at least 6 metres. Due to the presence of native vegetation along defined watercourses setbacks are much greater as vegetation forms part a considerable buffer from the</p>

	<p>watercourse. It is in these areas the exclusion of livestock, mitigation of erosion and sedimentation, the lowering of water tables, and reduction in salinity will allow for the natural recruitment of native fauna and flora.</p> <p>There is reference to mitigating salinity affected areas however not a lot of detail has been provided. Please refer to endnotes. If this provided information is insufficient can you please advise what is required given these concepts (benefits plantations can provide to managing water balance and quality locally and at the landscape level) are well understood.</p> <p>No substantial information on the environmental benefits has been provided. Again, refer to endnotes. A separate salinity plan is provided. The planting and harvesting of the <i>Pinus radiata</i> plantation over 25 years will generate approximately 107,000 Australia Carbon Credit Units which can be used to offset approximately 107,000 tonnes CO₂-e emissions. The removal of sheep over the same 25 year period will avoid approximately 36,000 tonnes CO₂-e emissions. Therefore, the development will result in the abatement and avoided emissions of approximately 143,000 tonnes CO₂-e.</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>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>Discussed separately in Table 6</p> <p>A fire management plan has been provided separately.</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>The covering letter dated 27 May 2024 states that there is an existing house however it has not been occupied for a decade.</p> <p>Recommend applicant expand on the condition of the existing house, whether it is habitable or in a state of disrepair and include photographs of the house. No assessment has been made by the applicant as to whether the house is habitable.</p> <p>If the house is habitable a BAL is normally required. A BAL has been provided. Please note comments on habitability above.</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>The applicant proposes to protect existing creek lines with a buffer but the width has not been stated. No re-vegetation or water quality is mentioned.</p> <p>Minimum setbacks are clearly defined in Section 4 Property Description being a minimum 6 metres. There are no permanent water courses (creeks) on the property.</p> <p>Only very limited information on specific environmental benefits has been mentioned. Refer to the salinity survey.</p> <p>The application does not specify if any future grazing is proposed once the species have matured as part of ongoing management. Whilst it is possible for grazing to occur after the plantation has been established. This is currently not our policy due to the risk to native flora, native fauna, soil (e.g., compaction, erosion) and water quality (e.g., sedimentation, eutrophication).</p> <p>Fencing of creeklines for grazing? Not applicable.</p>
<p>10.7 Plantation Management Plan</p>	<p>Discussed separately in Table 5.</p>
<p>10.8 The suitability of the current and future road systems (for harvesting only).</p>	<p>Harvesting Plan has not been provided.</p> <p>It is premature to provide a Harvest Plan now, when the first harvest will not occur until 12-15 years.</p>

	<p>As per the forest 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 this harvest operation.</p> <p>A haulage route plan has been provided and has been referred to MRWA for comment.</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'*.

Officer Comment:

No significant justification provided. Although it is recognised that the lot has been used as plantations historically, it is not clear when the previous plantation was established, harvested, and if occurred prior to town planning controls over plantations being in place.

Whilst the historic land use is recognised it is strongly recommended that the applicant provide additional information to address the Shires Local Planning Policy.

The Shire has considered variations to it's LPP in the past, where applicants have provided additional information such as detailed site photos, agricultural reports, soil testing etc

It is apparent that the Shire has considered very few DA's for tree farms in recent years.

The genesis of the Shire's policy seems to be in response to a single FPC proposal back in 2019 that the Shire council refused but was then approved via mediation at the State Administrative Tribunal (SAT).

Since the mid 2000's, the tree farm estate for commercial harvest has been in considerable decline, across Australia, across the South West of WA, and in the Shire of Cranbrook.

We understand and acknowledge the legacy of the blue gum MIS schemes that were prevalent in the Shire, noting these peaked around 25 years ago now, and that since then, the area of land under plantation has been in decline. This decline is concerning, a major shortfall of timber is anticipated which will impact on things like housing construction, even fence posts for agriculture, in the near future.

The subject land is suited to tree farm, and this is evident by its former use for this purpose. It is nonsensical to suggest a whole of farm tree farm can only be allowed to establish on land that is degraded.

The Policy also states that 'If an applicant seeks any variation or support for plantation areas on a 'whole lot' basis then the application should be accompanied by justification such as;

- Land Capability Studies; *Not provided. A salinity survey is provided separately.*
- Farm Management Plan; *Provided however it is very broad and lacks detail. Can you please advise the detail required noting it is a long-term plan.*
- Soil or water test results demonstrating areas not suitable for agriculture; *Not Provided. A salinity survey is provided separately.*
- Photographs showing shallow soils or rocky areas which visually demonstrate that the land is not suitable for agriculture. *No site photos provided. . As per above.*
- Demonstration that planting areas will have local environmental benefits for the specific location (refer 10.3). *For example, larger planting areas may be warranted as block planting adjacent to a creekline, or for salinity prone areas.*
' Not clear if any revegetation for creek lines is proposed. The nature of the existing lots in terms of salinity, water logged areas, or rocky outcrops is not explained in detail in the application. The removal of livestock will result in the natural recruitment of native fauna and fauna in buffers and in existing native areas. The salt scald photos, salinity survey are quite detailed.

- **Plantation Management Plan**

TABLE 5 -

Timber Code of Practice	
Appendix 1 Protocols for Management Plan	
<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>A simple 5 page management plan has been lodged with broad details on plantation establishment and maintenance. The information is not specific and there are no clear 'triggers' for actions to be taken for ongoing management. The forest management plan is specific to the property. See Sections 2, 4, 5 & 6. This informs Sections 8, 9 & 10. Please note many activities are reactive and therefore not determined by a schedule in a long-term forest management plan. As a result, we break down our planning long-term (20+ years)>>tactical (3-5 years), and operational (1 year). As you can appreciate the level of detail increases as the planning horizon reduces.</p> <p>Further, it makes little sense for our business to poorly manage this investment. We cannot sell a sub-standard product or risk loss of the product to fire. To maximise the product, the tree farm has to be well managed, particularly fire risks.</p> <p>It would be concerning if these comments were suggesting our company is ill equipped or unqualified to manage this investment. A DA runs with the land, this is a land use determination not a personal interview about our capabilities.</p> <p>Further, the Code is a guide only, it is not prescriptive or designed as means to evaluate a DA.</p> <p>There is some indication of a maintenance schedule on page 5, however there is no clear commitment to regular inspections in the medium to long term. The table in Section 7 Silviculture and Monitoring clearly shows the maintenance, monitoring and inspection schedule. Please note many activities are reactive and therefore not determined by a schedule in a long-</p>

	<p>term forest management plan. Thus, site visits are likely to be common and focussed around the fire season.</p> <p>The monitoring (section 7) mentions weekly for the first 6 months, and then only one annual inspection. An annual inspection is not adequate to ensure a rigorous ongoing maintenance of such a large property. The forest management plan clearly shows that many activities occur when they are required and states at a minimum annually for two activities. Therefore, at a minimum there will be two visits. However, inspections are likely to be much more than this and be focused on annual fire monitoring and management. Ultimately, the number of inspections will be determined by the annual management plan which is developed considering the prevailing local environmental conditions and the age and health of the plantation.</p> <p>We will support the local brigade and look to become a signatory to the FIFWA member, State and Local Agencies MOU regarding response to fire.</p> <p>It may be that more regular inspections are proposed however it hasn't been clearly outlined in the Management Plan. See above.</p>
<p>Plantation Management Plan, 3.0 Plantation Establishment Plan</p>	
<p>3.3 Control of Vermin and declared weeds</p>	<p>No clear inspection schedule or detailed comments on the methods and mechanisms to be used to control animals such as foxes, rabbits and kangaroos. For example, there is one sentence on 'pest management'. Generally, foxes and kangaroos are not considered pests in plantation management. Kangaroos are protected and we will work with neighbours and community groups for the control of pigs, rabbits and foxes. Generally, rabbits are not an issue but may be controlled where required during establishment or when undertaking a coordinated response with neighbours or community groups.</p> <p>The description of weed control is broad and there is no mention of how often the</p>

	<p>lots will be inspected in the medium to long term or whether the condition of the lots and maintenance actions will be recorded. Fire kills <i>Pinus radiata</i>. Weed load can represent unacceptable competition, fuel load and fire risk. Weeds are part of the monitoring and firebreak inspections and maintenance. All management activities are recorded in the forest records. Notwithstanding the commercial imperatives to manage weeds (plantation health, fire risk, fire insurance,), there are obligations to manage weeds under the Shire of Cranbrook's Annual Firebreak Notice and any declarations made under the Biosecurity and Agricultural Management Act 2007. This is detailed in Section 7 Silviculture and Monitoring.</p>
3.6 Direction of Planting Lines	<p>States it will follow contours but there is no information on contours, or a description of topography/slopes. An establishment plan is developed prior to cultivation and after relevant approvals.</p>
3.7 Description of soil preparation methods	<p>Lacks a description of soil preparation methods or any pre-treatment of soil. Eg Burning of paddock stubble, pre-fertiliser application Section 7 Silviculture and Monitoring clearly indicates rip mounding or ripping only will be used.</p> <p>Not clear if there are remnants of previous plantation to be cleared up. There are two potential bluegum (<i>Eucalyptus globulus</i>) sites near the house and associated access driveway that are being considered for clean up subject to the current landowner finding a market for the resource. If the bluegum resource is not able to be sold, the bluegum area will remain standing and will be marketed with the softwood resource in the future.</p>
Plantation Management Plan, 4.0 Plantation 'Tending' (Maintenance) Plan	
4.1 Grazing Strategy	<p>No grazing mentioned. No grazing contemplated.</p> <p>Appears to rely on other weed control such as spraying but there is no clear maintenance or inspection schedule or 'triggers' for maintenance. Section 7 clearly indicates likely inspection</p>

	<p>schedule. Again this will be determined in the annual management plan. In many instances the trigger for management action is economic loss or positive cost: benefit analysis. We have developed proprietary decision support tools to aid in decision making and operational planning.</p>
<p>4.4 Weed Management</p>	<p>Weed and pest control prescription is very broad Weeds and pest are function of the prevailing conditions. Not determined by a schedule in a long-term forest management plan. We have developed proprietary decision support tools to aid in decision making and operational planning.</p> <p>Concerned about ongoing issues if there are maintenance issues or issues with vermin/weeds. Notwithstanding the commercial imperatives to manage weeds (plantation health, fire risk, fire insurance), there are obligations to manage weeds under the Shire of Cranbrook's Annual Firebreak Notice and any declarations made under the Biosecurity and Agricultural Management Act 2007. This is detailed in Section 7 Silviculture and Monitoring.</p>

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

It is recommended that the applicant address the above in the Management Plan, and include a complaints procedure. We have an internal complaints procedure. Complainants can contact us through phone, email or post.

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

A comprehensive Bushfire Management Plan (or Fire Management Plan) has not been provided. General information on Fire Management is included but it is very broad. A separate fire management plan has been provided.

TABLE 6 -

<p>Plantation Management Plan, 5. Bushfire Management Plan</p>

Item	Guideline	TPI Comments based on DFES Guidelines for Plantation Protection
2.1 External firebreaks and setback distances	<p>50 metre minimum between any non habitable structure (shed) and plantation</p> <p>100 metre minimum between any habitable structure and plantation</p>	<p>Site plan shows buffers to house and shed.</p> <p>Bushfire Management Plan does not specify that the 50m buffer will be maintained to sheds and a 100 metre buffer will be maintained to the house. Attachment 1 of the forest management plan clearly shows the statutory buffers surrounding the house and shed. Section 7 Silviculture and Monitoring applies to the entire property.</p> <p>No BAL provided for house (SPP3.7). BAL has now been provided.</p> <p>Note, this is not essential when the house cannot be occupied.</p> <p>The existing house on the property is not habitable so no setbacks are required to be met. In the event the house is renovated and reestablished to a habitable standard, the BAL recommendations and setbacks specified in the application material (100m buffer to the habitable dwelling) will be achieved.</p>
2.2 Fuel Reduction	<p>Fuel reduction is encouraged where possible taking into account factors such as remnant vegetation, management techniques, and natural features.</p> <p>The Guideline lists methods available for managing fire breaks.</p>	<p>The Bushfire Management Plan states that the fuel loads of remnant vegetation will be monitored and the use of prescribed burning or mechanical fuel management will be considered if there is a threat to the plantation.</p> <p>Seek clarification on 'mechanical fuel management' methods. We will take a risk management approach to fuel management. There are several options available to manage fuel loads in native vegetation (e.g., fire, mulching, handling and repositioning, and thinning). The risk management approach to fuel loads in native vegetation will also take into consideration the Shire of Cranbrook's Annual Firebreak Notice, and the Environmental Protection (Clearing of Native Vegetation) Regulations 2004.</p>

		<p>No fuel reduction is proposed. No mention of thinning.</p> <p>Recommend that there be some commitment to a detailed monitoring and maintenance schedule with regular inspections. Refer to Section 7 Silviculture and Monitoring. Our annual planning is more detailed and takes into consideration the age and health of the plantation and the prevailing weather conditions and regulatory environment.</p>
3a.	Landowner and / or occupier information, contact details and 24 hour fire contact number.	<p>Only landline number provided seek confirmation that the land line will be monitored 24 hourly, and why no mobile contact number has been provided. Can confirm this is a 24 hour number which is directed to the Fire Duty Officer after hours. All fire should be reported to 000 in the first instance.</p> <p>Where is the contact person located? The Fire Duty Officer contact person changes weekly and is based on a roster system. The rostered contact person may well be based in other Regional centres but will be the focal point for addressing the planning, logistics and supply of suppression resources as directed by the controlling fire agency.</p> <p>No explanation of who can attend the site in the event of a fire or employment of a suitable person to attend the site for fire or ongoing maintenance inspections. Delta Forestry is the responsible manager and we will have a designated staff member onsite to liaise with local fire agencies and assist with suppression activities and the direction of contracted fire suppression equipment during the mop-up phase. This information is detailed in our annual management plan.</p> <p>We are aware of the existing cooperative arrangements between industry, relevant State agencies and</p>

		local government. We will commit to seeking to become signatories and offer to work with local brigades during and post summer fire season to support training and resourcing.
3b.	Contact details of local fire control agencies	Provided in a table on Page 7.
3c.	A fire fighting equipment register and details of any co-operative arrangements.	<p>Not detailed. There is confirmation that a 150,000 litre water tank is available on site. See Section 8 which and separate fire management plan. Please note plantation condition, resources, and co-operative arrangements change through time and can be communicated routinely at the Shire's Bushfire Advisory Committee.</p> <p>Seek confirmation on accessibility of water tank for emergency vehicles, and if it has a camlock. There will be access for emergency vehicles and a camlock will be installed. We will liaise with the local brigade to determine the appropriate camlock size as we are aware there is no standard sizing.</p> <p>Seek advice on whether any pumps for dams will be employed. A quick fill will be required during fire suppression.</p>
3d.	Plantation species, area and layout including compartment size.	Provided on development application map. Site plan is clear.
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. 	<ul style="list-style-type: none"> a) Fire detection and reporting mechanism is outlined in 8. b) Not clear if owner / employed manager/ fire contact person (Delta Forestry) can attend site in case of a fire. Delta Forestry is the responsible manager. c) Potential ignition sources not discussed. Lightning, Powerlines, plant and equipment and the general public with potential fire ignition point along Muirs Highway. d) Access in and around the plantation. Provided via 15m

	<ul style="list-style-type: none"> 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 programme if applicable such as herbicide use or grazing. 	<p>perimetre fire breaks and 6 metre internal firebreaks.</p> <ul style="list-style-type: none"> e) Clearly signed access roads. Signage mentioned for water points but not access roads. Access roads will be marked on the fire maps located in red tube at main access points. f) Methods of firebreak maintenance. Not clearly stated. Assume mineral earth firebreaks and spraying but should be stated. Firebreaks will comply with the Shire of Cranbrook's Annual Firebreak Notice. g) Measures to protect services (eg powerlines). A powerline is shown on the site plan but the firebreak width for the powerline is not mentioned in the Bushfire Management Plan. The powerline is a 22kv distribution line. A 20 m setback either side of the powerline is included in Attachment 1 of the forest management plan. Need to confirm type of power line as there are specific fire break and setback clearances for pine under the DFES Guidelines (page 20). h) Water supplies and capacity. Specifies one dam is a reliable water source in extreme conditions (page 7), but it is not clear which dam the text refers to. The site plan just shows all the dams. Should clarify as DFES/fire brigade should be aware of which dam is most reliable in extreme conditions. Section 13 in Attachment 1 of the forest management plan. Water tank is cited as secondary water source. Clarify accessibility and camlock fittings. Water points will be detailed in our fire maps and shared with the relevant
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		<p>authorities as detailed in Section 8 Fire Management. Surrounding vegetation type, age since burnt and if the site is being effectively managed (if available). No fire history is mentioned and /or whether vegetation in adjacent reserves is well managed. There is a 15 metre fire break from neighbouring properties. The Shire should have records of recent fire history of the neighbouring properties. Notwithstanding this, the Cobertup Reserve was burnt 4-5 years ago (existing landowner pers comm). This is supported by visual checks of the Reserve in the preparation of the development application. Firebreaks around the Reserve are in place but appear not maintained annually. The native vegetation between the property's southern boundary and Muir's Highway is long time unburnt. There are no records available as to when this was last burnt. Please note, management actions of neighbours is outside of the scope of the forest management plan. We will work with neighbours to coordinate our management activities to manage fire risk. The 15 m firebreak is appropriate for the external boundaries as per the DFES guidelines.</p> <p>i) Sites fire history, where available. No fire history is mentioned and /or whether vegetation in adjacent reserves is managed. It is understood there is no recent history of uncontrolled fire. The Shire should have records of recent fire history. Native vegetation areas within the property have been grazed in the past and consequently,</p>
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		<p>most of the native understorey scrub species have been replaced by pasture grasses. Outside the property, the native vegetation between the property's southern boundary and Muir's Highway appears long time unburnt and there are no records available as to when this was last burnt.</p> <p>j) Harvesting procedures and other measures used to reduce hazards (eg slashing, thinning). Not specifically mentioned These details can be provided in the harvest plan prior to the commencement of harvesting in 12-15 years time. Procedures will be specific to the harvest method, prevailing regulatory framework and local conditions at that time.</p> <p>- Fuel reduction programme. Only refers to fuel management/monitoring for remnant vegetation areas. Fire kills <i>Pinus radiata</i>. Our priority is to keep fire from entering the plantation.</p>
3f.	Surrounding local features including existing plantations, proximity to towns, remnant vegetation and significant values relevant to the site.	<p>There is a District Context Map but it does not outline existing plantations, reserves in the area containing remnant vegetation or significant values. Appreciate, the aerial image may not clearly delineate between plantations and native vegetation, and we have provided an updated map.</p> <p>It shows the nearest towns.</p>
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 main entrance.
3h.	Fire compartment maps will indicate: <ul style="list-style-type: none"> - Compartment boundaries and sizes 	Plantation map shows firebreaks, water points, and compartment areas as well as a house and sheds.

	<ul style="list-style-type: none"> - Water supplies including dams - Emergency access/egress (firebreaks) - Structures - Significant features such as remnant vegetation 	<p>It is not clear which dam is the one identified as being most summer reliable under extreme conditions. Section 13 of Attachment 1 of the forest management plan. Also see updated Fire Management Plan.</p>
<p>4.1 Compartment size and layout</p>	<ul style="list-style-type: none"> - 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 for emergency service access. 	<p>All compartments are less than 30 hectares.</p> <p>The map shows firebreaks with sharp turning angles so it is not clear if they are sufficient for emergency fire vehicles. The turning circles on the property are sufficient. On the external boundary there are 4 turning angles less than 90 degrees and none less than 45 degrees. There are 16 turns in total on the external boundary with a 15 m wide running surface. Please see note on turning circles below.</p> <p>The Shires Community Emergency Services Manager has advised he can provide further comment if more detailed Fire Management information is provided. Can you please advise which specific information is required? This information might normally be found in our annual management plan. We would welcome the opportunity to share this information through attending the Shire's Bushfire Advisory Committee.</p> <p>In the interim it has been referred to DFES for comment, and the Shire is waiting for their response.</p> <p>No information or description of topography or slope. Undulating topography with a slight slope to natural waterways.</p> <p>The most reliable summer dam should be identified. Section 13 in Attachment 1 of the forest management plan. Also see separate Fire Management Plan.</p>

<p>4.2 Fire breaks and access</p>	<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>It is not clear if any passing bays are proposed or turnaround areas for fire vehicles (eg near dams/water points). There is no requirement for passing bays as there is sufficient line of sight due to the location and widths of 6 m and 15 m firebreaks. Refer to section 4.2 of the DFES guidelines. Where line of sight allows, a 3 point turn can be executed at speeds between 0-5 km/h on a 15 m firebreak (12.5m radius required)^{vii}.</p> <p>Report states there will be 15 metre external firebreaks and 6 metre internal firebreaks. The forest management plan also includes 5m of vertical clearance where required.</p>
<p>4.3 Water Supplies</p>	<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>Recommend provide greater explanation on the most reliable dam for water supply, and how the water can be accessed. Section 13 in Attachment 1 of the forest management plan by designated accessway as shown. There is no mention of pumping water. Please see comment above.</p> <p>Also request more detail on the existing water tank, if they will keep it filled in summer, if it is accessible and if it has a camlock fitting. The tank will remain connected to the existing watershed and will have camlock fittings. We will liaise with the local brigade to determine the appropriate camlock size as we are aware there is no standard sizing.</p>
<p>5. Equipment and training</p>	<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>	<p>No explanation on how this will be achieved.</p> <p>No reference to training, machinery or fire fighting equipment.</p> <p>No reference to harvest bans. Please see Fire Management Plan.</p>

	<ul style="list-style-type: none"> - ensuring that any personal have adequate training - Machinery to be fitted with fire extinguishers. - Fire fighting equipment to be maintained in good working order. - Adhere to harvest bans 	<p>In addition, we commit to becoming a signatory to the industry, State agency and local government MOU with FIFWA. The industry is proactive and available to build further relationships with the Shire via the Bush Fire Advisory Committee.</p>
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- **Fire Management Plan – Shire Local Planning Policy**

The Fire Management Plan does not appear to have been prepared by a fire consultant. Qualifications or explanation of the experience of the person who prepared the plan has not provided.

Disagree. This confuses a Tree Farm with SPP3.7 which deals with habitable development. Tree Farms are exempt from SPP3.7. In any event a separate Fire Management Plan has been provided.

As a minimum all Fire Management Plans shall be compiled by a suitable qualified or experienced fire consultant and;

1. Address the Bushfires Act (1954), the FESA (now DFES) Guidelines for Plantation Fire Protection 2011 and the local government firebreak notices. Refer Table 6
2. Generally follow the DFES Guidelines however also include;
 - Consideration of increased bushfire risk to any structure within 100 to 150 metres of any proposed planting areas and other land uses in the vicinity of the plantation lot – refer Clause 10.6.1. There is no BAL Assessment which considers existing vegetation within 100 to 150 metres. Applicant mentions house is unoccupied so it is not clear if it still habitable or not. There is a 100 m setback as per the DFES guidelines. We are unsure of its habitability and it will not be occupied or tenanted. If for some reason it is renovated and becomes habitable, we are required to ensure a 100m setback, as well as comply with the Shire's Annual Firebreak notice.
 - Identify and address bushfire hazard as if it already existed, in accordance with State Planning Policy 3.7 (SPP3.7). FMPs should identify increased bushfire risk associated with the plantation in it's most mature state. Not mentioned and no BAL provided. Our understanding a 100 m and 50 m setbacks from the plantation for the existing house and sheds meets this requirement (it is designed as if it existed). BAL has now been provided. Correct, 100m comes from SPP3.7 which only applies to habitable development.
This is consistent with State Planning Policy 2.5 Rural Planning Guidelines Version 3 December 2016 which references SPP3.7.
 - A fire suppression response examining the ability of the local fire brigade to respond to a fire on the property, having regard for distance, existing available local equipment and the location of on site water supply. Not clearly discussed in Fire Management Plan. It identifies resources in Busselton, Dardanup and Manjimup so this indicates local fire brigades

may not attend. The local brigade details can be found in Section 8 Fire Management. The resources identified in Section 8 are Delta Forestry resources available to the landowner. Also see the Fire Management Plan.

- We commit to working with the local brigades and the Shire's Bushfire Advisory Committee. We appreciate the extent of plantation estate has significantly decreased in this part of the Shire over the last decade. We are obliged to manage risk and a level of emergency response on our property, we are happy to, plus it is essential to manage our commercial investment, to do our fair share.
 - Outline the owners' responsibilities, neighbours' responsibilities, and applicant's responsibilities. Clear responsibilities not detailed in Fire Management Plan. Recommend clear owner responsibilities be included such as regular inspections, timing of inspections, compliance with annual firebreak notice to install and maintain fire breaks (bare earth and spraying). This information can be found in Section 7 and section 8 of the forest management plan. Also see the Fire Management Plan. Specific information which takes into consideration the most current and up to date information can be found in the fire map and the annual management plan.
 - Fire Management Plans must nominate a local contact person or contractor who can attend the plantation site in the event of a fire emergency, for installation of fire breaks and regular ongoing maintenance of the plantation. Not clearly provided. Please see the Fire Management Plan. This information can also be found in the fire map and our annual management plan.
 - The Plan to have clear scheduled regular inspections, a rigorous ongoing maintenance regime with measurable outcomes, which demonstrates a strong management commitment; Not outlined clearly enough. Please see the Fire Management Plan. This information can also be found in Section 7 of the forest management plan.
 - Owners may need to consider providing on site water trucks for use in the event of a fire having regard for the property location, and realistic fire suppression response. Not mentioned. Please see the Fire Management Plan. This information can also be found in our annual management plan and the forest management plan states it will comply with the Shire of Cranbrook's Annual Firebreak Notice. We will provide an appropriate response to fire which may include water trucks, quick-fills and utility mounted slip-on units. This will be in addition to any resources sourced through any resource sharing arrangements with third-parties, local brigades and Stage agency response.
3. Include a location/ context plan examining the surrounding land uses and identifying; District Context Plan provided but it doesn't include all the information. A revised context plan has been provided.
- Other existing or approved plantations within the immediate vicinity. Not identified. Clear on the updated context plan. Looks to be surrounded by former plantation land now reverted to cropping and grazing, plus reserve land.

- Any significant surrounding industries or land uses which may impact on fire management such as Rural Industry (hay storage), wood stockpiling, fuel storage etc
 - Identify any residential, rural residential or built up townsites located within 1 kilometre. **Not mentioned so unclear if it has been checked. There may not be any. No townsites nearby.**
 - Identify nearby well vegetated areas or sources which may increase the risk of fire. **Not Provided. There are reserves in the immediate area. All land is required to comply with the annual firebreak notice.**
 - Increased bushfire risk of mature plantations for existing development in the vicinity of the plantation. **Not mentioned. Two mature plantations nearby one is currently being harvested and the other appears due for harvest.**
4. Include a Fire Management Plan (site plan) addressing the guidelines for 'fire prevention and suppression' contained in the Code and clearly show;
- Compartments and compartment sizes. **Provided**
 - Water supply / points. A rainwater tank with a minimum capacity of 50,000 litres is required. **There is a water tank however not clear on it's accessibility, if it has a camlock fitting, and if they will maintain a certain water level in summer months. Detailed above.**
 - Location of any powerlines passing through planting areas or in close proximity to planting areas and / or proposed firebreaks. **Powerlines shown however the firebreak distance around it is not specified. Detailed above.**
 - Location of fire breaks. The site plan is to clearly distinguish between boundary firebreaks, strategic firebreaks, compartment breaks, fire breaks along public roads and fire breaks along powerlines using a colour coded legend. **Plan only shows one firebreak (grey legend) and does not differentiate between the different fire breaks, Plan has been updated.**
 - Turnaround areas for emergency vehicles. **Not Provided or clear on the plan. Not required given design of firebreaks.**
 - Location for emergency signage. **Not shown on plan. Suggest can provide a more detailed signage plan at a later date. See Fire Management Plan.**
 - Emergency access / egress points and internal accessways. **Provided.**
 - Existing or proposed gates where firebreaks/emergency accesses intersect with fencing that can accommodate a 4.4 fire appliance. **No fencing shown so it is not clear if there are any other gates, other than the 3 shown on the site plan. There is no information on the width or type of gates. Suitable access is achieved.**
5. Identify the location of any existing structures and need for low fuel areas. DFES Guidelines recommend a 50 metre distance between a planted area and any non habitable structure. **Distance not specified in the Fire Management Plan text and should be listed as an ongoing requirement for the 'owners responsibilities'. This can be found in Section 4 and in Attachment 1.**

This distance may need to be increased for protection of established land uses on adjacent lots – refer Clause 10.6.1.

6. Comply with the relevant minimum fire break standards outlined in the Shire of Cranbrook's Fire Break Notice. **Mentioned however concerned over lack of**

detail for ongoing regular inspections of fire breaks, water tanks and dams over summer. The detail is in our annual management planning.

7. Involve consultation with the relevant authority (such as; Department of Water and Environmental Regulation; Water Corporation, the local government or the like) where the land is adjacent to a reserve, conservation area or crown land. Fire Management Plans should be independently managed unless there is a formal written agreement from an adjacent reserve owner over issues such as major burning of land outside of the application. **Not Provided.** Fire management activities will be independently managed and may involve subcontractors.

ⁱ Government of Western Australia (2000). *State Salinity Strategy, March 2000*.

ⁱⁱ Conservation Commission of Western Australia (2013). *Salinity management in the south-west of Western Australia*.

ⁱⁱⁱ CSIRO (2022). *Mapping salt-affected land in the South-West of Western Australia using satellite remote sensing*.

^{iv} Department of Environment (2005). *Stream salinity status and trends in south-west Western Australia*.

^v Department of Agriculture and Food (1996). *Salinity action plan*.

^{vi} Department of Water (2007) *Salinity situation statement Kent River*.

^{vii} Austroads (2023). *Austroads design vehicles and turning path templates*.