



Government of **Western Australia**
Department of **Fire & Emergency Services**



Our Ref: D05911
Your Ref: DA18/0226

Luke Harris
City of Kalamunda
enquiries@kalamunda.wa.gov.au

Dear Mr Harris

RE: VULNERABLE LAND USE - LOT 500 (32) GAVOUR ROAD, WATTLE GROVE – RETIREMENT VILLAGE AND AGED CARE FACILITY - LOCAL DEVELOPMENT PLAN

I refer to your email dated 19 June 2018 regarding the submission of a Bushfire Management Plan (BMP) (Version 0), prepared by Strategen Environmental Consultants Pty Ltd, and dated 16 May 2018, for the above Local Development Plan (LDP).

DFES provide the following comments with regard to *State Planning Policy 3.7 Planning in Bushfire Prone Areas* (SPP 3.7) and the *Guidelines for Planning in Bushfire Prone Areas* (Guidelines).

Assessment

1. Policy Measure 6.3 a) (ii) Preparation of a BAL contour map

Issue	Assessment	Action
Vegetation classification	The classification of Class G Grassland along the Crystal Brook creek line is not substantiated. The BMP refers to the area being modified. However, it is unclear if any environmental considerations (if revegetation, clearing permits are required) will prejudice the assumptions within the BMP. Furthermore, an enforceable mechanism is required to provide certainty that the proposed management measures can be achieved in perpetuity and that they are enforceable. Alternatively, the vegetation classification should be revised to apply the worst case scenario as per AS 3959.	Modification/clarification required.
BAL Contour Map	The Method 1 BAL calculation indicates a 14 metre and 17 metre separation distance (slope dependent) for development adjacent to Class B Woodland to achieve BAL-29. However the nominated setbacks within the LDP, adjacent to the Class B Woodland (periphery of site) is only 10 metres. It is unclear given this discrepancy if the independent living sites sited adjacent to perimeter boundaries can achieve BAL-29 or lower.	Modification required.

2. Policy measure 6.5 c) Compliance with the Bushfire Protection Criteria

Element	Assessment	Action
Location	A1.1 – insufficient information The BAL ratings cannot be validated, as the vegetation classification inputs require modification as per the above table.	Modification required.
Siting & Design	A 2.1 - not demonstrated The development has not been designed appropriately to ensure bushfire protection measures can be achieved and to minimise the level of bushfire impact to people that are considered vulnerable.	Modification required.
Vehicular Access	A3.3 – not demonstrated Two cul-de-sacs are incorporated into the design without incorporating required turn around provisions.	Modification required.
	A3.5 – not demonstrated An internal road which is intended to provide egress for a large number of unknown occupants (190 independent living sites plus an aged care facility) should not be considered a private driveway in a residential context. The internal road should be designed to meet the requirements of a public road and facilitate unimpeded two-way traffic throughout the site in an emergency event. It is not demonstrated a vertical clearance of 4.5 metres can be achieved where the internal road passes beneath Western Power high voltage lines.	Modification required.
	A3.6 – not demonstrated The LDP does not demonstrate the EAW is of sufficient size to meet the requirements of Table 6 of the Guidelines (pg. 68). The EAW leg should be redesigned to meet the requirements of an EAW and facilitate unimpeded two-way traffic throughout the site in an emergency event. Additionally, the internal road (including the bridge) and EAW should give consideration to meeting structural fire-fighting requirements at planning stages (refer DFES Guidelines GL11 - DFES site planning and fire appliance specifications). A fire appliance responding to a structure fire within a multi storey aged care facility may require increased turning circles and roads (and bridges) capable of supporting 30 tonnes; above that of the bushfire protection requirements for vehicle access.	Modification required. Comment
Water	A4.3 – comment The BMP states the project will be provided with a reticulated water supply. The lot is approximately 750 metres in length and will require fire hydrants to be provided within the private development in accordance with AS2419.1 Appendix B to address the bushfire risk. This should be clarified within the BMP at subsequent development approval stages.	Comment for subsequent development approval stages.

3. Policy measure 6.6 Vulnerable land uses

Issue	Assessment	Action
Bushfire Emergency Evacuation Plan (EEP)	<p>Subject to this policy measure, development applications for vulnerable land uses are required to include an Emergency Evacuation Plan (EEP). The LDP recognises the site is intended for an Age Care Facility which is a vulnerable land use, and whilst an EEP is not required at this stage, consideration should be given to the formulation of an EEP at subsequent planning stages.</p> <p>It is recommended that further consideration be given to the Guidelines (Version 1.3) Section 5.5.2 'Developing a Bushfire and Emergency Evacuation Plan'. This contains further detail in regard to what an EEP should include and will ensure the appropriate content is detailed when formulating an EEP for submission to the City of Kalamunda at the development approval stage.</p>	Consideration for subsequent planning stages.

Recommendation – not supported modifications required

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

1. The development design has not demonstrated compliance to Element 1: Location, Element 2: Siting and Design, Element 3: Vehicular Access and Element 4: Water.
2. The proposed development is intensifying land use in a bushfire prone area without addressing the increased risk associated with a vulnerable land use.

If you require further information, please contact Land Use Planning Officer, Sherrie Nicholas on telephone number 9482 1777.

Yours sincerely



Sandeep Shankar
SENIOR LAND USE PLANNING OFFICER

26 July 2018