



Our Ref: D41020
Your Ref: PG-DEV-067

Cardia Mariani
City of Kalamunda
enquiries@kalamunda.wa.gov.au

Dear Ms Mariani

RE: PROPOSED WATTLE GROVE SOUTH LOCAL STRUCTURE PLAN

I refer to your email dated 27 October 2025 regarding the submission of a Bushfire Management Plan (BMP) (Version C_Draft), prepared by Western Environmental and dated 19 August 2025, for the above proposed local structure plan (LSP).

This advice relates to the *State Planning Policy 3.7 Bushfire* (SPP 3.7) and supporting *Planning for Bushfire Guidelines* (Guidelines), as well as DFES' role and responsibilities as Hazard Management Agency (HMA) for Fire in Western Australia.

General Comment

- DFES acknowledges that the proposed LSP intends to guide the subdivision and development of land known as Wattle Grove South.
- Specific requirements of SPP 3.7 and the Guidelines are to be further addressed in the BMP as outlined in the below assessment Tables 1 and 2.

Recommendation: Compliance with acceptable solutions

DFES advises that the BMP has not demonstrated that the proposed LSP complies with the following requirements of SPP 3.7 and the Guidelines:

1. Element 2: Siting and Design; and
2. Element 3: Vehicular Access.

DFES recommends the BMP be modified as per the Assessment advice provided in Tables 1 and 2 to ensure it is accurate and the bushfire risk management/mitigation measures are effective and can be implemented in perpetuity to manage/mitigate the bushfire risk to people, property and infrastructure to an acceptable level and appropriate to the proposal and location. The required modifications are listed in the table(s) below. Should the modified BMP affect the design of the proposal, the proposal should be amended to reflect these modifications.

Could you please forward notification of the proposal determination to DFES for our records.

If you require any clarification or further information regarding the below assessment, please do not hesitate to contact me on telephone number 9395 9702.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Sean He'.

Sean He
SENIOR LAND USE PLANNING OFFICER

21 November 2025

Cc: cardia.mariani@kalamunda.wa.gov.au

Table 1: Assessment – Policy Measure 7.1 ii. c. Compliant Preparation of a BAL Contour Map

Vegetation Classification or Exclusions	BMP Modification Required
<p>Post-development POS – Comment Only</p> <p>The Post-Development Vegetation Classification (Figure 5) in the BMP excludes a number of public open space (POS) areas as managed to low threat in accordance with AS 3959.</p> <p>Detailed Landscape Management Plans should be provided at subsequent planning stages to confirm these vegetation exclusions.</p>	<p>Comment only</p>

Table 2: Policy Measure 7.1 ii. e. Compliance with the Bushfire Protection Criteria 5: Structure Plans and subdivision applications

Element	Assessment	Action
<p>Siting and Design – Siting and Design</p>	<p>A2.2 – not demonstrated</p> <p>The Bushfire Attack Level (BAL) Contour Map (Figure 6) in the BMP shows that portions of residential cells and the primary school site are subject to BAL-40 or BAL – Flame Zone (FZ).</p> <p>Considering the size of the structure plan area, there appears to be no constraint to achieve BAL-29 development sites for the proposed lots. In accordance with section 5.4 of the Guidelines, the implementation section of the BMP should be modified to commit to a condition on the future subdivision approval stating that <i>‘Each lot shall include a development site of BAL-29 or below, to the satisfaction of the WAPC.’</i></p>	<p>Compliance with Siting and Design not demonstrated</p> <p>Modification to the BMP is required to address the Assessment advice.</p>
<p>Vehicular Access – No-through Roads</p>	<p>A3.3a – not demonstrated</p> <p>There are three no-through roads indicated on the structure plan layout. No-through roads should only be considered where site constraints prevent an alternative layout. It has not been demonstrated that no alternative layout exists.</p>	<p>Compliance with Vehicular Access not demonstrated</p> <p>Modification to the BMP is required to address the Assessment advice.</p>
<p>Vehicular Access – Perimeter Roads</p>	<p>A3.5a – not demonstrated</p> <p>The structure plan layout is likely to result in 10 or more lots adjacent to Class A Forest within the conservation POS areas. A perimeter road in accordance with the acceptable solution A3.5a has not been proposed in these areas.</p>	<p>Compliance with Vehicular Access not demonstrated</p>

	<p>DFES as the HMA, considers that the public road system in a bushfire prone area should provide direct access and egress for firefighters to areas of extreme bushfire hazard during a bushfire emergency and safe and efficient evacuation for residents. The intent is to separate extreme bushfire hazard areas from developable areas and establish access within and around the perimeter of subdivisions for bushfire suppression operations as well as fire preventative work.</p> <p>It has not been demonstrated that a perimeter road cannot be achieved in these areas.</p>	<p>Modification to the BMP is required to address the Assessment advice.</p>
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Table 3: Policy Measure 7.1 iv. and Section 9.4.2 of the Guidelines: DFES Role as Hazard Management Agency (HMA)

DFES wishes to provide the below additional advice in its role and responsibilities of HMA for Fire in Western Australia.

DFES Other Technical Advice		Action
DFES Land Use Planning	<p>It is the responsibility of the proponent to ensure the proposal complies with relevant planning and building requirements. This advice does not exempt the applicant/proponent from obtaining approvals that apply to the proposal including planning, building, environmental health or any other approvals required by a relevant authority under written laws.</p>	Comment only.