

Attachment 11.1.4

Erin Gower

From:
Sent: Monday, 8 January 2024 2:44 PM
To: Erin Gower
Subject: Fwd: [External] 230256 - 314 Chalwell Road, Carlotta
Attachments: 230256 - 314 Chalwell Road Carlotta (Response to DFES Comms).pdf; 230256 - 314 Chalwell Road Carlotta (BMP) v1.1.pdf

Hi Erin,

Thank you for meeting with us earlier today. Please find attached the response to the queries raised by DFES regarding our application for the property located at 314 Chalwell Rd, Carlotta.

In addition to the attached response, we would like to highlight that there is an additional private driveway access to the property which is compliant with technical requirements. It has a much lower gradient and large vehicle passing bay which can be used as the main entrance.

As noted in the attached document, the asset protection zone has been cleared to meet requirements.

We are aware that the surrounding forest is a Black Cockatoo habitat, and this has been taken into consideration when clearing the asset protection zone.

As per the recommendation in the BMF it is our intention to close the property to guests during extreme or catastrophic fire danger periods.

Please let us know when the application will go to Council and we will endeavor to attend in person.

Thank you again for your help.

Kind regards,

Mark and Christine Donnelly

SHIRE OF NANNUP RECEIVED	
Ref. A1451	No:
8 JAN 2024	
Officer: Erin	



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PO Box 388 Guildford WA 6935

P: 6477 1144

Our Ref: 230256

8 November 2023

Erin Gower
Shire of Nannup
PO BOX 11
NANNUP WA 6275

Dear Erin,

**RE: BUSHFIRE PRONE PLANNING'S RESPONSE TO DFES ADVICE REGARDING VULNERABLE LAND USE –
314 CHALLWELL ROAD, CARLOTTA – PROPOSAL HOLIDAY HOME**

Please find Bushfire Prone Planning's response to the DFES comments on the BMP prepared for the development proposal and our proposed actions in the following tables.

The BMP has been updated to reflect the DFES comments.

If you wish to discuss these further, please do not hesitate to contact [me/this office].

Yours sincerely

Kathy Nastov | BSc. Env Man, GradDip Bushfire Protection

Director

Bushfire Prone Planning

(Accredited Practitioner **BPAD Level 3**)

1. Policy Measure 6.5 a) Preparation of a BAL Assessment

DFES ADVICE		BPP RESPONSE / ACTIONS
Issue	Assessment	
Landscape Plan	<p>The BMP has identified that a significant amount of Class A Forest will need to be modified to achieve an APZ compliant with Schedule 1: Standards for Asset Protection Zones contained in the Guidelines.</p> <p>A Landscape Management Plan should be prepared to remove ambiguity for the landowner and to provide a compliance mechanism for the Shire.</p>	<p>BPP Comment: A Landscape Plan has been incorporated into the revised BMP.</p>
Evacuation Assumptions	<p>There are several assumptions in section 1.1 of the BMP which should be removed. These assumptions are not valid in the context of short-term accommodation.</p> <p>Comments relating to evacuation should be contained within the Bushfire Emergency Evacuation Plan and not within the BMP. The following statement should be removed from page 6 of the BMP "on days of Extreme fire danger that guests depart the property for the day or if there is a fire in the vicinity."</p>	<p>BPP Comment:</p> <p>This detail has been removed from the BMP.</p>

DFES ADVICE		BPP RESPONSE / ACTIONS
Issue	Assessment	
Construction to AS3959 Building Standards	<p>The DFES acknowledges that AS3959 does not apply retrospectively to existing buildings if the use does not change.</p> <p>However, the decision maker should consider upgrading the dwelling to utilise all the elements of AS3959 that apply to the appropriate Bushfire Attack Level (BAL). This is consistent with Clause 78E(i) Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 that requires the local government to have regard to the bushfire resistant construction requirements of the Building Code of Australia.</p> <p>Although BAL construction standards do not guarantee the survival of the occupants or building, DFES supports the improved bushfire resilience provided by AS 3959:2018 construction standards.</p>	<p>Noted</p>

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

DFES ADVICE		BPP RESPONSE / ACTIONS
Issue	Assessment	
Vulnerable Land Uses Intent	<p>Intent – does not comply. The BMP should not ignore the site context and the serious threat of bushfire to people, property and infrastructure at this location. The likelihood of a bushfire, its severity and intensity, and the potential impact on life and property posed by the bushfire hazard at this location represents an extreme bushfire risk that cannot be adequately reduced.</p> <p>This location does not provide for appropriate bushfire protection to manage the bushfire risk based on a range of factors including, but not limited to:</p> <ul style="list-style-type: none"> - There are vast tracts of bushfire prone vegetation within 150 metres of the site boundary which represents an extreme bushfire risk. - Due to the extreme bushfire prone vegetation on multiple aspects, catastrophic bushfire behaviour is likely, and a bushfire could develop rapidly and grow to a significant size, resulting in the loss of life, property and infrastructure. - The site would present significant complexities for response and may not reasonably and realistically be able to be defended in the event of a bushfire emergency. - Evacuation from the site, with its singular access route, may not be possible and if attempted could pose an unacceptable risk to human safety. - Shelter on site is not considered an acceptable alternative to evacuation given the extreme risk to life and property at this location. The topography, type and extent of bushfire prone vegetation may result in landscape-scale destruction as it interacts with the bushfire hazard on and close to the site. 	<p>BPP Comment: BMP updated to incorporate more context and details</p>

DFES ADVICE		BPP RESPONSE / ACTIONS
Issue	Assessment	
Vulnerable Tourism Land Uses - Vehicular Access	<p>P5v – does not comply. The public road system in a bushfire prone area should provide alternative access and egress for firefighters and residents during a bushfire emergency.</p> <p>Vehicle access is unlikely to be achieved at this location as evacuation options are limited, traverse extreme bushfire risk areas or are not available, making access and egress options uncertain during a bushfire event.</p> <p>Access in two different directions to two different destinations, in accordance with the acceptable solution, is not available until the intersection with Vasse Highway approximately 13 kilometres from the development site. This exceeds the acceptable maximum length of 200 metres for a dead-end road where the adjoining classified vegetation has an extreme BHL.</p> <p>The BMP has not demonstrated Chalwell Road meets the full technical requirements of the Guidelines as per Table 6 Column 1. It does not appear to achieve the width or height clearance as seen in Photo ID 16.</p> <p>A5.5a states the road complies with the technical requirements whereas A5.5c states it does not comply with the technical requirements. It is unclear whether the 'technical requirements' referred to in the compliance statements is referencing Table 6 or the requirements of the acceptable solution.</p> <p>Furthermore, the compliance statement against A5.5e states the driveway meets the full technical requirements of Table 6 Column 3 of the Guidelines but then states the landowner will need to check the gradient complies with the technical requirements. The BMP should confirm the gradient of the driveway complies with the technical requirements of Table 6 column 4.</p>	<p>BPP Comment: Chalwell Road meets the technical requirements of a public road.</p> <p>The internal driveway cannot meet the technical requirements. The BMP has been revised to acknowledge this.</p>

DFES ADVICE		BPP RESPONSE / ACTIONS
Issue	Assessment	
Vulnerable Tourism Land Uses - Water	<p>A5.6 – not demonstrated. The BMP states there are two water tanks on site and will meet the requirements of A5.6 of the Guidelines. It has not been demonstrated there is sufficient water available for firefighting purposes. It is not clear in the BMP of the size of tanks or if the water tank will be dedicated for firefighting purposes to comply with A5.6.</p> <p>It is also noted the water tanks appears to be located in BAL40/FZ. The APZ around one of the water tank is 20m and there is no APZ around the other tank in figure 3.1.1.</p> <p>It is also noted that the coupling set up and piping will need to be replaced to meet the requirements of A5.6 of the Guidelines. It is recommended water tanks dedicated for firefighting purposes and adjacent hardstanding are located in areas of BAL-29 or below and accessible by a type 3.4 fire appliance.</p>	<p>BPP Comment: BMP revised to ensure this can be clearly interpreted. There is a water tank that is dedicated for fire-fighting and complies with the technical requirements.</p>

3. Policy Measure 6.6.1 Vulnerable Land Uses

DFES ADVICE		BPP RESPONSE / ACTIONS
Issue	Assessment	
Bushfire Emergency Evacuation Plan (BEEP)	The referral has included a 'Bushfire Emergency Evacuation Plan' for the purposes of addressing the policy requirements. Consideration should be given to the Guidelines Section 5.5.4 'Developing a Bushfire Emergency Evacuation Plan'. This contains detail regarding what should be included in a BEEP and will ensure the appropriate content is detailed when finalising the BEEP to the satisfaction of the Shire.	BPP Comment: Noted