

Mr Craig Pursey,
Senior Planning Officer
Shire of Jerramungup

Dear Craig,

LOCAL PLANNING POLICY NO 22 BAL Contour Plan for Jerramungup & Bremer Bay

Submission to the proposed SoJ policy No 22 and the associated report by Bio Diverse Consultants.

LPP22

I am sending these comments as both an architect and research scholar in ecological, landscape urbanism and architecture with interest and experience in ecological planning and architecture design in Australian Bushfire landscapes.

I also write in support of the submission of my colleague and neighbour, Dr Ian Wier, of QUT and Bushfire Building Council of Australia and Centre for Emergency and Disaster Management, who has outlined a range of technical objects with which I concur, in the submission he has forward to you today.

A prime driver for many people who have invested substantially in Bremer Bay, especially Point Henry, is living within a pristine, biodiverse, natural landscape, neighbouring the Fitzgerald National Park and forming part of the Fitzgerald Biosphere, part of one of the globe's major Biodiversity Hot Spots under the UN Biodiversity Treaty of which Australia is a signatory. The Federal Government has adopted the Biodiversity Conservation Act and it is my view and that of Dr Ann Smithson of Smithson Environmental, that the kind of mandation of BAL 29 and clearing around structures that is implied in the SoJ policy will be in contravention of that Federal Act. As you may be aware, federal acts and national treaties out rank local and state laws.

We, as people who value these unique, rare and endangered landscapes, wish to see them conserved in perpetuity for their own sake, their intrinsic value in and of themselves, for the benefit, wonder and delight of future generations, and for their role as parts of the complex interweavings of Earth's interconnected ecosystems.

As previously stated by me to Council, Architecture and Construction are perfectly able to adapt design of buildings to withstand anything to which the environment can subject them. Our urban buildings are already designed to withstand fires in their neighbours as has been the case since the regulations developed in Britain since the Great Fire of London, which are the forerunners of all anglophone nations' building codes. It is feasible to build floors, walls, roofs, openings that can withstand 3 hours of intense fire, indeed this is normative in inner city environments, resulting in very few instances of spread of fire between buildings except in the most exceptional of circumstances.

There is no practical impediment to the design of fire resistant buildings in Flame Zone bushfire landscapes. There is therefore, zero necessity for SoJ to mandate regulations enforcing clearing of habitat around buildings in bushfire landscapes.

In any case, there is ample evidence, as per Dr Weir's various submissions and writings, that clearing offers little to no protection from structural fires during bushfire events. Buildings burn from structural fires, NOT bushfires.

I have no objection to indicative mapping, but there is always a risk that mapping such as that used in this policy will be imprecise and hence misleading for the purposes of accurate architectural design for a fire landscape.

In reality, all landscapes evolve over time. BAL levels assessed one year, are likely to be superseded many times over during the life of a well designed and constructed building, making a nonsense of these policy provisions that seek to limit everything to BAL 29. The ONLY safe method is to design everything for Flame Zone, and adapt our human lifestyles and behaviours to that too keep ourselves safe.

It may be that over a period of centuries, that Aboriginal pre 1788 landscape management by means of mosaic burning of small areas of land in a patchwork in the landscape, may provide long term relief from the threats of bushfire, but realistically, we need to address the present realities.

Building to anything other than Flame Zone will leave people and property at long term risk. Just as clearing will guarantee loss of biodiversity that is already under gross threat by over clearing, invasive species, and climate change effects like heat and drought.

Has the shire carried out a full environmental assessment of these policies?

These seem to be inconsistencies between the policy and the provisions of AS 3959? (shielding) Ditto the Construction Code provisions, which are PERFORMANCE BASED not explicit. As you will understand, the 'acceptable conditions', 'seemed-to-satisfy' provisions, etc., are mere illustrations of one possible solution among thousands of design solution possibilities.

The indemnification of neighbours is onerous and unjust. Council, and they state government, must consider all design options, including BAL 40 and Flame Zone, in formulating just and equitable rules for the design of healthy human environments.

I believe that this policy requires much further study and wider consultation, and commend the submission by Dr Weir to you for your consideration. I would be happy to attend any sessions between Dr Weir, others and Council in support of deriving a wiser and more practicable, just and equitable set of guidelines for the inhabitation of our beautiful natural environments which happen also to be bushfire landscapes. The potential for mass clearing around buildings and in settlements in the Shire and elsewhere in the State, thereby destroying much of the remaining perishingly small areas of biodiverse remnant habitat, is far too high a price to pay for what will prove to be virtually no real gain in bushfire safety.

Mr Craig Pursey,
Senior Planning Officer
Shire of Jerramungup

Dear Craig,

LOCAL PLANNING POLICY NO 22 BAL Contour Plan for Jerramungup & Bremer Bay

Submission to the proposed SoJ policy No 22 and the associated report by Bio Diverse Consultants.

I forward these comments in my capacity as a Standards Australia 'FP-20' committee member on AS3959, as a local resident, and as an expert Architect in the field of building in bushfire prone areas. I have some experience with BAL Contour mapping through my role as expert advisor to community members of Wye River and Separation Creek (Otway Shire Victoria) having been invited to engage with that community by the Victorian State Government Architect's Office last year.

Firstly, I am concerned that the potential on-the-ground outcomes of this policy are not made clear within the document, nor have they been communicated to the landowners and community that are likely to be affected by this policy.

The principle of reducing cost to landowners for BAL assessments is valid. BAL Contours maps have been used by Local Governments elsewhere in Australia to expedite post bushfire rebuilding – such as the Wye River/Separation Creek in the Otway Shire Victoria. A BAL Contour map provided by Local Government should not of course preclude a resident from commissioning their own BAL assessment – so in this regard I am encouraged by the provision in the draft policy for variations to the mapped BAL levels (Clause 6.2(c)).

This is an important point because the methodology used by Bio-Diverse is primarily a Method 1 BAL assessment under AS3959. Where they have used the somewhat more precise Method 2 BAL assessment this has been done by applying the assumed fuel loads of vegetation classifications in AS3959 (I note they have used McCaw's fuel load research for example – but they have not actually measured the fuel loads in the field). A home developer commissioning a Level 3 BPAD assessor (for example) to conduct a thorough Method 2 assessment using a CSIRO Fuel Load on-site measurement method will likely record a different (likely lower) BAL rating that what is depicted in these contours maps.

One very concerning potential outcome of these maps is that it will trigger the clearing and permanent modification of important vegetation within and around the townsites of Bremer Bay and Jerramungup. I have highlighted a section of the Bremer Bay contour map (attached) where future residential homes on existing lots are mapped by Bio-Diverse as BAL-FZ. The Policy makes no mention of the ability for home developers to apply the 'Minor Development' provisions of SPP3.7 which specifically accommodates BAL-40 and FZ housing in existing subdivided lots (highlighted on page 4 of the attached SPP3.7). Instead the draft policy spruiks a BAL-29 'mantra' (as if this is the maximum BAL allowed under SPP) and so one can only conclude that the outcome of the policy's implementation is landscape clearing, prescribed burning and permanent modification to reduce the mapped BALs to BAL29 at the external wall of existing and future houses. From my reading of the 2016-2026 Community Strategic Plan this is not in alignment with the community's

aspirations for conservation of natural assets. A more balanced approach – as facilitated by the SPP3.7 – is to allow BAL-40 and FZ housing where fuel reduction cannot be achieved without environmental impact.

Has an environmental impact been conducted, or is it planned to be done prior to the implementation of this policy?

Has a cost benefit analysis been conducted which has assessed the costs of perpetual management of the vegetation to achieve BAL 29 levels.

Has a risk assessment been conducted to assess the risks of prescribed burning of vegetation to achieve BAL 29 levels.

The ‘Minor Development’ Provisions of SPP3.7 which enable BAL-40 and BAL-FZ housing are an important provision targeted at housing in existing subdivisions in bushland areas. Importantly this provision was added to the Draft SPP which did not adequately cater for housing in subdivisions where the original conditions (on the subdivider) prioritised bushland conservation.

The clause 6.2 (d) is of particular concern because this puts the onus on a neighbour to indemnify a landowner in perpetuity just because their local government won’t approve houses built above BAL-29. While SPP3.7 does allow BAL40 and FZ principally to remove this legal impediment on neighbours. I believe it is a flawed policy that relies on a neighbour to indemnify a development approved by a Local Government.

Regarding cost, there is a significant error in the interpretation of AS3959 in the policy’s Clause 6.2 (b): *“The BAL Contour Plan applies BAL ratings to those areas designated bushfire prone. The highest BAL rating within the footprint of the proposed building(s) applies to the entire building(s); in a manner consistent with AS3959”*. This is incorrect and inconsistent with AS3959. Clause 3.5 of AS3959 (page 37) clearly allows for a reduction in construction requirements due to shielding – and in fig 3.1 (page 38) it demonstrates how three elevations can shield the fourth elevation and thus reduce the BAL by a factor of one (and comply with AS3959). This is a very common and practical application of AS3959 BALs because often that lesser BAL elevation is where the primary entry/egress areas of the dwelling are which are the most expensive elevation to ‘protect’. Furthermore AS3959 states that a Class 10a Building does not have to comply with AS3959 if it is greater than 6m from a dwelling. So the public when reading the draft policy will incorrectly surmise that all buildings on the lot will have to comply with say BAL-29 if just the front wall of the future house overlaps the BAL29 zone.

It should also be noted that the National Construction Code does not mandate compliance with AS3959’s construction levels. It instead provides performance requirements. One way to meet these performance requirements is to comply with one of two standards: AS3959 and the NASH Standard (Steel framed houses in Bushfire Areas).

The draft policy states that *“This project seeks to treat the existing townsites as a ‘subdivision’ with the intention of allowing applications for development and Building Permits to use the BAL Contour Map in lieu of providing a separate BAL Assessment”*. I hope I have demonstrated above that while this might be an expedient and well intentioned approach it is a regulatory framework that is a very poor fit with these two existing townsite communities that are characterised by ad hoc development over many years amongst significant remnant vegetation, some of which are identified Threatened Ecological

Communities. Therefore such BAL Contour maps – applied in this manner - should only be used as a guide and community information resource and NOT as a regulatory instrument.

(on a technical note – the BAL Contour map for Jerramungup does not have the BAL zones in the Key).

I hope this submission is of some constructive use in advancing greater community and landscape resilience.

I would be happy to discuss any of these point further at any time.

Kind regards,
Ian Weir

Dr Ian Weir

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BA Industrial Design *CU*
RAIA

Research Architect

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**Bushfire Building Council of Australia
Centre for Emergency and Disaster Management**

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Our Ref: D01221
Your Ref:

Craig Pursey
Shire of Jerramungup
planning@jerramungup.wa.gov.au

Dear Mr Pursey

RE: DRAFT LOCAL PLANNING POLICY 22 – BAL CONTOUR PLAN FOR JERRAMUNGUP AND BREMER BAY TOWNSITES

I refer to your letter dated 2 December 2016 seeking comment on the draft Local Planning Policy 22 (LPP) and accompanying BAL Contour Plan produced by Bio Diverse Solutions Pty. Ltd dated 4 October 2016. The Department of Fire and Emergency Services (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).

Higher level consideration of bushfire risk is one of the most effective means of preventing inappropriate development in bushfire prone areas. Given the LPP will guide the future development of the townsites of Jerramungup and Bremer Bay it is vital an assessment of any bushfire hazard issues arising from the BAL contour mapping is undertaken.

It is critical to connect the spatial understanding of the bushfire threat with strategic decisions about intensification of land use to reduce the vulnerability of people, property and infrastructure to the threat of bushfire (see page 71 of Guidelines).

An understanding of the bushfire hazard provides for the identification of opportunities and constraints for areas proposed for land use intensification. These areas can then be evaluated against each other, as well as each element of the bushfire protection criteria, to highlight the locations where it is unlikely compliance to the criteria can be achieved.

1. General Comments

- i. At such a broad scale, the accuracy of the BAL Contour Map at lot level is difficult to confirm. Comments are provided on the understanding that the Bushfire Planning Practitioner is an accredited practitioner and has the necessary skills to undertake the assessment.
- ii. DFES comments are not an endorsement of the assessment itself or of the accuracy of the inputs used to determine the BAL ratings. They are limited to the presentation of the information (see Appendix 1).

- iii. DFES does not support the BAL contour mapping being used for subdivision applications or strategic planning proposals for the townsites of Jerramungup and Bremer Bay.
- iv. The LPP should include requirements for a Development Application and/or a Building Permit for development in areas identified as: BAL-FZ, BAL-40, BAL-29, BAL-12.5 and BAL-LOW.
- v. The LPP should include a statement that a further BAL assessment or certification that the BAL contour is accurate, may be requested at the Building Permit stage, by the Building Surveyor if deemed necessary.
- vi. It is suggested that the objectives of the LPP align to the objectives of SPP 3.7, as the current objectives appear to be outcomes.

2. Opportunities and Constraints Assessment

- i. An opportunities/constraints assessment should address issues related to the bushfire protection criteria that have arisen following the BAL contour mapping, including:

Protection criteria	Key considerations
Element 1: Location	<ul style="list-style-type: none"> ○ Consider the landscape context of the proposal, including the type and extent of vegetation, topography (particularly land with slopes of >10 degrees), areas of possible fire-runs and evacuation options. ○ Identify areas which represent an extreme bushfire risk that cannot be managed and should not be supported for development. Areas most suitable for land use intensification are where the bushfire hazard is low or moderate. ○ Identify conservation areas including TEC, Bush Forever, nature reserves or national parks that may constrain a location. ○ Identify areas that would require clearing to achieve an appropriate BAL rating. ○ Identify vulnerable and high risk land uses, and critical infrastructure.
Element 2: Siting and design	<ul style="list-style-type: none"> ○ Apply appropriate density codes (or lot sizes) large enough to accommodate Asset Protection Zones (APZs) if required. ○ Identify interfaces between development and bushfire prone vegetation which may require increased setbacks to achieve an appropriate BAL rating (in accordance with AS3959).
Element 3: Vehicular access	<ul style="list-style-type: none"> ○ Consider the wider road network and identify any limitations to the provision of multiple access routes both at the local and district levels. ○ Identify vehicular access routes that provide safe access and egress to two different destinations. ○ Identify opportunities to improve access and egress for existing development including incorporating emergency access ways and fire service access routes where no alternative exists.
Element 4: Water	<ul style="list-style-type: none"> ○ In reticulated areas, highlight locations of hydrants and existing water infrastructure. ○ In non-reticulated areas, it will be necessary to demonstrate the availability of alternative water supplies for firefighting purposes.

- ii. It is critical that the work undertaken to determine the BAL contour mapping is connected spatially within the townsites and linked to the suitability of land for further intensification.

Recommendation

DFES advice is to amend the BAL Contour Plans for Jerramungup and Bremer Bay such that they provide the clarity, consistency and accuracy required to be used at a broad scale; as outlined in Appendix 1 there are several areas for improvement.

DFES advice is to ensure the findings from the BAL contour mapping are used for the townsites of Jerramungup and Bremer Bay to:

- identify opportunities and constraints for land use intensification;
- consider the ability to achieve compliance with the bushfire protection criteria; and
- inform bushfire risk management measures.

This will help to ensure that all findings within the plans avoid any increase in the threat of bushfire to people, property and infrastructure.

Should you require further information, please contact me on telephone number 9482 1760.

Yours sincerely



Michelle Neil
DIRECTOR ADVISORY SERVICES

10 February 2017

Appendix 1 – DFES comments on BAL Contour Plans

Issue	Assessment / Action
BAL Contour Plans	If the aim of the townsite BAL Contour Map is to enable land owners to determine the BAL for their lot, then the information needs to be at a scale with increased accuracy. The actual BAL Contour Maps provided are difficult to interpret and apply due to the scale of the map.
	It is suggested that the vegetation classification is presented with the aerial underlay and the BAL contours are presented on the cadastre so that individual lot owners can clearly identify the BAL for their lot.
	The vegetation classification colours and the BAL contour colours should be different for clarity and to aid interpretation. The colours are too similar and it is difficult to differentiate the contours from the vegetation classification. It could also imply the vegetation classifications are linked to the contour colours. It is suggested black is avoided as a BAL contour colour as it is difficult to distinguish between the roads. If the information is represented on two separate figures this will assist.
	The colours applied for the vegetation classification and BAL contours should be consistent across both the Jerramungup and Bremer Bay townsite assessments to aid interpretation, provide clarity and avoid confusion.
	The section 'Notes on methodology' (see page 7) refers to a Method 2 calculation for a vegetation type. A Method 2 assessment involves modification of the AS3959:2009 standard input values to determine a BAL rating. This has not been undertaken and cannot be undertaken in order to determine a vegetation type. This paragraph requires amendment.
	It is suggested that the figures/maps are numbered to enable easy referencing.
Bremer Bay BAL Assessment	Vegetation Classes East figure - The vegetation plots are not clearly delineated and some of the plot numbers are not connected to the vegetation areas. There are vegetation plots that are not marked or classified on the figure, and it is not possible to align the plots to the bushfire impacts table (ie. Plot 15 is not classified; Plots 6, 13, 14, 16, 17, 23-27 are not marked.)
	Vegetation Classes West figure - This information is presented differently to the east figure. There are no vegetation plot numbers and it is not possible to align the plots to the bushfire impacts table (see pages 17-19). The plots are named by vegetation type but not numbered. There are inconsistencies with the east figure and different colours have been used (ie. Plot 15 on the east figure is not mapped as forest but it is on the west figure; shrubland is green in one and blue in the other). The figures require cross checking.
	The photographic evidence of the vegetation (see pages 9-14) does not align to a figure or the bushfire impacts table (see pages 17-19). It appears the photographic evidence is representative of the vegetation across the assessment area; however the images have been given plot numbers. This requires clarification to avoid confusion.

Issue	Assessment / Action
	The photographic evidence of the vegetation also includes photo identification numbers but these are not marked on any figure.
	The 'Field Plot Summary' (see page 14) contains inaccuracies and does not correspond to the bushfire impacts table (see pages 17-19) (ie. Plot 17 is classified as Scrub Type D in the table but is Forest Type A in the summary; Plot 21 has been repeated three times). This information requires cross checking.
Jerramungup BAL Assessment	Vegetation Mapping Figure – The town and 100 metre assessment boundaries are incorrectly marked, there is an area in the south-east corner that has not been included. There are no vegetation plot numbers and it is not possible to align the plots to the bushfire impacts table (see pages 30-31).
	The photographic evidence of the vegetation (see pages 24-27) does not align to a figure or the bushfire impacts table (see pages 30-31). It appears the photographic evidence is representative of the vegetation across the assessment area; however the images have been given plot numbers. This requires clarification to avoid confusion. There is an incorrect attribution of Scrub as Type E on page 25.
	The photographic evidence of the vegetation also includes photo identification numbers but these are not marked on any figure.
	The 'Field Plot Summary' (see page 27) states that Plot 6 is Woodland Type B but the table (see page 30) states it is Scrub Type D. This information requires cross checking.
	BAL Contour Mapping – There is no key for the BAL Contours.



Your ref: LU.PL.8
Our ref: TPS/0261
Enquiries: Jackie Holm (65519351)

Chief Executive Officer
Shire of Jerramungup
PO Box 92
JERRAMUNGUP WA 6337

Attention: Craig Pursey

Dear Sir

Local Planning Policy No. 22: BAL CONTOUR

The Department of Planning (DoP) has reviewed LPP 22 and the BAL Contour Map and provide the following comments.

- At such a broad scale, the accuracy of the BAL Contour Map at lot level is difficult to confirm. Comments are provided on the understanding that the Bushfire Planning Practitioner is an accredited practitioner and has the necessary skills to undertake the assessment. These comments are not an endorsement of the assessment itself.
- If the aim of the BAL Contour Map is to enable land owners to determine the BAL for their lot, then the information needs to be at a scale with increased accuracy. The actual BAL Contour Maps provided are difficult to interpret. It is suggested that the vegetation classification is presented with the aerial underlay and the BAL contours are presented on the cadastre so that individual lot owners can clearly identify the BAL for their lot.
- Areas that fall outside the BAL contours, but within areas identified as being bush fire prone on the *Map of Bush Fire Prone Areas*, should be mapped as BAL-LOW on the BAL Contour Map.
- It is not clear whether this information is intended to be used to support subdivision applications.
- The LPP should provide further information about the implications for development in areas identified as being bush fire prone on the *Map of Bush Fire Prone Areas*. For example, Development Applications in areas with a BAL rating above BAL-LOW will also need to be accompanied by a statement against the bushfire protection criteria, in accordance with *State Planning Policy 3.7 Planning in Bushfire Prone Areas* (SPP 3.7) and the *Guidelines for Planning in Bushfire Prone Areas* (the Guidelines), as well as possible additional bushfire construction standards for certain classes of buildings.
- The LPP should include a statement that a further BAL assessment or certification that the BAL contour is accurate, may be requested at the Building Licence stage, by the Building Surveyor if deemed necessary.

Local Planning Policy 18: Point Henry Fire Management Strategy

DoP has reviewed LPP 18 and provide the following comments.

- Reference to *State Planning Policy 3.7 Planning for Bushfire Risk Management and Planning for Bushfire Risk Management Guidelines* should be updated to *SPP 3.7 Planning in Bushfire Prone Areas* (Dec 2015) and the *Guidelines for Planning in Bushfire Prone Areas* (Dec 2015).

- The paragraph above "Definitions" section is incorrect. It should state:

As of December 2015 the State Government also adopted the *Map of Bush Fire Prone Areas* and the *Planning and Development (Local Planning Schemes) Regulations 2015*, which includes Part 10A Bushfire Risk Management. For land identified as bushfire prone on the map, the following applies.

1. Under the Building Code of Australia, additional building construction requirements apply to residential buildings (Class 1, 2 and 3 buildings and associated Class 10a buildings and decks).
 2. A BAL assessment or BAL contour map is required for the development of all habitable buildings (excluding single houses and ancillary dwellings on lots less than 1,100m²).
 3. Development approval is required if the BAL assessment (assessed on the current state of the site) is BAL 40 or BAL FZ. An indicative BAL will need to be produced (preferably by a level 2 or 3 accredited Bushfire Planning Practitioner) that demonstrates BAL-29 or below, and includes a statement addressing the bushfire protection criteria (Appendix 4 of the Guidelines).
- Definitions should be consistent with those contained in SPP 3.7 and the Guidelines.
 - 'New dwellings and Outbuildings' section – 20, 000 litres for fire fighting purposes is not consistent with the water requirements specified in Appendix 4, Element 4 of the Guidelines.
 - Appendix 4 of the Guidelines, Element 2 'siting and design' will shortly be updated with revised acceptable solutions for Asset Protection Zones and the deletion of the Hazard Separation Zone. The LPP should reflect these changes.
 - The DoP are currently reviewing the Guidelines. Part of this review will be the inclusion of standardised templates for bushfire management plans or statements addressing the bushfire protection criteria. Until this is finalised the department is supportive of the use of the 'Bushfire Management Statement' included within LPP 18. The spatial representation is an easy way for landowners to understand their responsibilities for the implementation and ongoing management of the bushfire protection measures.

If you wish to discuss these comments please contact bushfire@planning.wa.gov.au or Jackie Holm, Principal Planning Officer on 6551 9351.

Yours sincerely



Samantha Stokes
Planning Manager
Policy and Priority Initiatives

6/02/2017

Local Planning Policy No 22

BAL Contour Plan for Jerramungup and Bremer Bay

N McQuoid Comments February 4 2017

Attention: Craig Pursey, Shire Planning Officer

I make my comments here in the first instance as a landscape/vegetation ecologist, in section 1. Then as a concerned resident in section 2.

It's a good thing that the Shire has developed the contour plan to assist development, however there could be complications and consequences. The issues the BAL Contour plan raises are relatively complicated, and I advocate apposite consultation with the community to inclusively consider the potential issues.

1. The local Jerramungup and Bremer Bay/ Point Henry vegetation communities are often not directly equivalent to AS3959 types, so conclusions cannot be accurately drawn on composition, structure and hazard as identified by the BAL Contour study.

Objective vegetation hazard assessments based on the reality of the local vegetation communities must be undertaken in order to achieve an accurate understanding of the hazard for each. While I believe the Contour Plan is a useful guide, the reality is likely to be different. Some of this has occurred with the Shire of Jerramungup/N McQuoid vegetation mapping and management project in prep. However, this project did not measure (weigh and calculate) biomass fuel/litter loads as tonnes/ha.

It may be possible to sustainably manipulate some of the vegetation communities towards a lower hazard rating, by using some easy to implement low-disturbance methods, which will maintain the integrity of the vegetation communities. This can be shown to be the case in the John St bushland in Bremer Bay, as assessed and recommended by the Shire of Jerramungup/N McQuoid vegetation mapping and management project in prep. This could be explained and discussed in the suggested consultation/workshops.

Further vegetation assessment and management matters require consideration and comment, which would be best served by the further consultation/workshop recommendation in section 2 below.

2. The contour plan presents some potential implications, complexities and contentious issues to consider. The potential conclusion to be taken from the plan will be the push to remove large areas of native bushland, which has never been a problem before, and is a very significant asset in itself.

The implications are unlikely to be aligned with original subdivision conditions to prioritise bushland conservation. And the implications may not align with Community Strategic Plan 2016-2026.

I strongly urge consultation as discussions/workshops with the communities so that the implications, complexities, concerns, and solutions can be properly shared and considered. In line with my and others recommendations in comments for the LPP 18 proposed revision.

I support the comments of Dr Ian Weir and Mr Gerard Siero on this matter. I encourage the Shire to use their submissions and expertise, and the consultation recommended above in developing the issues further to achieve effective and sustainable responses and solutions.

As always, I'd be happy to discuss the issue further if it is useful, and participate in consultation.



Nathan McQuoid

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