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Our Ref: 210620

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Development Services
Shire of Collie
87 Throssell Street, Collie WA 6225

Dear Katya and Matthew

RE: MINNINUP POOL – PROPOSED LEASE AREAS FEASIBILITY

1) Introduction:

Bushfire Prone Planning has been commissioned by Shire of Collie to undertake a bushfire planning feasibility study and subsequently report on the findings and associated bushfire performance criteria requirements of the area surrounding Minninup Pool (Reserve 23606, R34343). This document has regards to the Proposed Leased areas (Area 1: Old Hockey Grounds & Area 2: Kings Park), to provide a detailed response against the below scope provided (RFQ Bushfire Management Plan – July 2021).

1.1) Scope of Works:

- *Background information;*
- *Compliance and justification of proposed use and development against SPP3.7 and position statement - tourism land uses in bushfire prone areas as well as highlighting areas of non-compliance;*
- *Bushfire risk management measures required such as asset protection zone, additional vehicular/emergency access, water supply, evacuation plan, construction standards, sign posting etc and also including consideration of alternative solutions to ensure compliance with bushfire planning framework.*
- *Implementation and enforcement including tasks required, by whom and when.*
- *Spatial considerations of bushfire threat including BHL, contour map and BAL (as are relevant);*

The above has been assessed in conjunction with developing short term accommodation concepts identified within 'Minninup Pool Tourist Accommodation'. It is of the understanding that the two concepts will be the current representation of the potential projects, however, may be subject to future design changes.

The proposal provides two very different concepts and designs that when taken into consideration of 'State Planning Policy 3.7' and 'Tourism Land Use Position Statement' and subsequent 'lessee', may have different levels of perceived 'tolerable risk' towards the potential structures. Identified within the subject matter below are options that can be weighed up as to the level of risk the decision maker may consider reasonable for the proposal.

2) Background:

Simon McArthur created the report “Economic Development Task Force Report and a Tourism Opportunities” this project was initiated to plan and develop a nature-based tourism hub at Minninup Pool, supporting this idea with uniting “Munda Biddi Trail” and “Bibbulmun Track” for Collie’s new title Trails Town, with Collie river providing freshwater leisure activities, featuring short term accommodation and adventure options.

Subsequent to commencement of the Minninup Pool Tourism Precinct project in 2018 a significant amount of planning and community consultation has been carried out. The following provides a breakdown of the work accomplished to date:

- Reconnaissance and Targeted Flora and Vegetation Survey (EcoEdge) – November 2018
- Targeted Fauna Assessment (EcoEdge) - January 2019
- Noongar Visioning Report – (Dr Myles Mitchell & Rosie Halsmith) February 2019
- Noongar Heritage Report – (Dr Myles Mitchell & Rosie Halsmith) February 2019
- Site Analysis & Context Plans – (Planned Focus) - March 2019
- Demand and Prefeasibility Study (Brighthouse Consulting) – December 2019
- Geotechnical Investigation (Local Geotechnics) – May 2020
- Minninup Pool Tourism Project – Servicing Report (River Engineering) – June 2020.
- Further investigation to identify and outline the conceptual design of services infrastructure – October 2020.
- Master Plan for the Redevelopment of Minninup Pool Day Use Areas (Vicki Winfield and Associates) - December 2020.
- Community consultation – broad and targeted has been undertaken as a necessary part of Noongar visioning, demand and prefeasibility and masterplan for redevelopment of the day use areas. This has included meetings, forums, workshops, surveys, and media communications.

An expression of Interest regarding an opportunity for leasing two areas within Minninup Pool for tourism accommodation development was advertised in late 2020 from the Shire of Collie. A preferred proponent for the development of the portion of site colloquially known as ‘Kings Park’ has been selected and a second proponent has also expressed interest in the site locally known as ‘the old hockey ground’.

The process to excise the two proposed accommodation sites into independent lots for the purpose of short-term tourist accommodation is underway with the Shire now getting preliminary planning assessments and associated reports for finalisation of the lease agreements.

In August 2021 Bushfire Prone Planning (BPP) conducted an onsite assessment of Minninup Pool, subsequently producing this document regarding the two proposed leased areas providing essential advice on planning requirements in bushfire prone areas. BPP are also providing a detailed Bushfire Management Plan for the “Day use area” development/upgrade within Minninup Pool.

3) Site Observations:

- a) The development area comprises of forest classified vegetation, based on the understory and extent of canopy coverage.
- b) Multiple informal off-road vehicle tracks.
- c) Extensive fire scorch marks on canopy vegetation (evidence of previous extreme bushfire behaviour) on a large portion of the assessment site area.
- d) Lack of signage to identify access or location.

4) Proposed design concepts:

4.1) Area 1: Old Hockey Ground

Defined as a staged project with potentially 40 villas, a caretakers stand-alone building, reception combined with a wellness and function centre is proposed. Luxury rammed earth and wood structures, each structure could consist of up to 3 bedrooms, a bathroom kitchen and a designated outdoor area. These structures are identified as permanent.

4.2) Area 2: Kings Park

Stage one outlines 14 Eco-tents with full occupancy being 60 people, stage two offers a wellness building, restaurant, and additional Eco-tents. A reception/staff lodge and toilet blocks are shown on the concept plan. Composition is understood to be semi-permanent structures, advertised to be glamping style short stay accommodation. It is assumed the structure configuration other than the accommodation would be permanent.

5) External factors:

Listed below are factors that currently add to the threat/risk of bushfire for many communities around the State, the suggestions within this report are not only to meet the requirements set in the scope of works, but contribute to providing an opportunity to communicate with the Shire of Collie community and all visitors of Minninup pool a remedy or response to the below.

- a) Fire seasons are lasting longer each year due to climate change. Leading to extreme environment/vegetation dryness resulting in increased bushfire risk.
- b) Escalating complexities in risks to the conservation of natural values, including threatened species and ecological communities.
- c) Increasing residential and other developments close to bushland.
- d) Growing numbers of people and vehicles using forests, parks, and reserves (potential ignition sources).
- e) Increasing community expectations of landowners/managers to keep communities and infrastructure safe from bushfires.
- f) Heightened community expectations, and Local Government responsibilities, for the protection of natural values.
- g) Communities increasing their divergence of experiences and expectations about bushfires and fire management needs.
- h) Increased amount of illegal dumping in unmanaged/unpopular bushland increasing the risk of bushfire.

6) State Planning Policy 3.7: Planning in Bushfire Prone Areas

The policy intent is to implement effective, risk-based land use planning and development to preserve life and reduce the impact of bushfire on property and infrastructure. It is used to inform and guide decision-makers, referral agencies and landowners/proponents to help achieve acceptable bushfire protection outcomes. The policy contains objectives and policy measures, as well as reference to the bushfire protection criteria contained in the Guidelines.

Objectives:

- *Avoid any increase in the threat of bushfire to people, property, and infrastructure. The preservation of life and the management of bushfire impact are paramount.*
- *Reduce vulnerability to bushfire through the identification and consideration of bushfire risks in decision-making at all stages of the planning and development process.*
- *Ensure that higher order strategic planning documents, strategic planning proposals, subdivision and development applications take into account bushfire protection requirements and include specified bushfire protection measures.*
- *Achieve an appropriate balance between bushfire risk management measures and, biodiversity conservation values, environmental protection and biodiversity management and landscape amenity, with consideration of the potential impacts of climate change.*

Short stay accommodation (Tourist development) is defined within the guidelines as a vulnerable land use. SPP 3.7 - 6.6 'Vulnerable or high-risk land uses' require both a Bushfire Management Plan and an Emergency Evacuation Plan to accompany any development application.

Unavoidable development is defined as: in the opinion of the decision maker, exceptional circumstances where full compliance with the policy would be unreasonable; no alternative location exists; not minor development; and is not contrary to public interest. The guidelines provide further definition, identifying relatable aspect aligning with this project - "preservation of history or cultural sites".

6.1) Compliance or Constraints:

- a) Both proposals will require a Bushfire Management Plan and Emergency Evacuation Plan to support the development in line with SPP 3.7. Due regard of the Guidelines for Planning in Bushfire Prone Areas are given, however due to the nature of the proposals (Tourism Land Use), the Acceptable Solutions within the Tourism Position Statement are required to be addressed within the Bushfire Management Plan.
- b) Optionally "unavoidable development" could be considered, highlighting the aboriginal historical and heritage factors, as the bushfire protection requirements within the guidelines would impose adverse impacts on the preservation of history or cultural sites.

7) Position Statement: Tourism Land Uses in Bushfire Prone Areas

Western Australian Planning Commission published a position statement to provide guidance for tourism land uses within bushfire prone areas. The position statement maintains primacy for the protection of life but also recognises that the protection of property or infrastructure may be secondary to the social and economic development of a region. If human safety can be satisfied, the asset may be considered 'replaceable', and its bushfire construction level determined to the degree necessary.

Objectives:

- *maintain primacy for the protection of life, but also recognise preservation of property or infrastructure may be secondary to the social and economic development of a region*
- *provide bushfire protection relevant to the characteristics of the tourism land use*
- *provide bushfire risk management measures that mitigate the identified risks*
- *achieve a balance between bushfire risk management measures, environmental protection, biodiversity management and landscape amenity*

The subject areas are being assessed against the following Performance Principle headings established within Table 1 'Caravan Park (Includes Camping Ground)' and/or 'Other (vulnerable) short-term accommodation – including motels, serviced apartments, tourist development, holiday accommodation':

- *Siting and Design*
- *Vehicular Access*
- *Provision of Water*

The Position Statement is effective immediately in the determination of planning applications until a revised policy as part of Stage 3 of the Bushfire Framework Review 2019 is gazetted.

7.1) Compliance or constraints:

- a) The assessment considers the requirement for Asset protection zones (APZ's) to be created to achieve 29kW/m² around infrastructure within the entire development site (see figures 4 & 8).
 - Due to several factors (significant flora, habitat trees, vegetation condition and aboriginal heritage) it may not be permitted or acceptable from an environmental, aboriginal heritage or social position. Within the BAL contour maps (see figures 4, and 8) it is identified what would be required to achieve 29kW/m² for APZ implementation. If appropriate APZ's are unable to be achieved, or where there are no bushfire construction standards, with the loss of the structures being identified as a tolerable risk (i.e eco tents), a Risk Assessment is required to be developed (Performance Solution).
- b) Two access routes are to be considered for the development sites.
 - At present the Minninup Road is non-compliant due to being a dead-end road longer than 200m. It is intended, through discussions with the Shire that Minninup Road be constructed through Mungulup Road, thus providing adequate access for the Hockey Ground Site. Compliance can be achieved by installing an emergency access way heading south of the proposed site to meet up with unsealed road connected to Mungulup Road. Kings Park Site would be able to achieve compliance with the provision of an emergency access way through the golf course onto Mungulup Road. Provision of this additional access will additionally improve the access for the Day Use area, achieving compliance for this site also.

- c) Non-gazetted roads will be required to meet the Technical Standards of the Guidelines including appropriate turnaround areas and passing bays.
- d) Provision for a minimum of 50,000 litres per 25 structures of firefighting water is required.
 - Lease areas could be compliant with a non-combustible water tank with appropriate connection fittings dedicated to firefighting purposes. Minninup Pool is located on Collie River it would also be able to prove an additional source of water as a drafting point for 4-wheel drive fire appliances.

8) Additional Considerations:

- a) *Caravan Parks and Camping Grounds (CPCG) regulations 1997* is responsible for providing the baseline requirements surrounding caravan/camping parks, there is references within regarding firefighting equipment.
- b) *Nature Based Parks: Licencing guidelines for developers and local government (DLGSCI)* provides better understanding of the requirements defined within the Caravan Parks and Camping Grounds regulations 1997, in addition it also provides local government with advice surrounding fire and emergency management.
- c) *Planning Bulletin 49/2014 (WAPC) – Caravan Parks* contributes guidance on the matters to be taken into consideration in planning for caravan parks, including the development of new or redevelopment of existing parks. There is definition and advice on environmental factors including bushfire prone areas
- d) *The following documents should also be reviewed when evolving the development requirements for Minninup Pool:*
 - *Tourism Planning Guidelines 2014 (WAPC)*
 - *Planning Bulletin 83/2013 (WAPC) – Planning for tourism)*

9) Additional Bushfire Mitigation Considerations:

- a) Where the Risk Assessment identifies that an onsite shelter is required, it is recommended that the Collie Golf Course Club House be assessed to determine whether it could be used as a Bushfire Shelter/Evacuation centre with the intention of following through to upgrading the club house. This would require sufficient separation distance from the predominant bushfire prone vegetation to avoid exposure to a radiant heat flux exceeding 10kW/m² and retro fitment to be in accordance with National Construction Code and the ABCB Community Shelter Handbook as applicable. Creation of the Golf Course Club House as a bushfire shelter would be benefit to not only the Minninup pool development but it would be supporting surrounding members of the community by providing an essential bushfire resource in the event of a bushfire emergency.
- b) Adopting pre-emptive evacuation procedures within the Bushfire season by closing during total fire BAN, Extreme and/or Catastrophic Fire Danger Rating days. Department of Parks and Wildlife (DPAW) have embraced this method for their Parks, Campgrounds and Trails.
- c) Landscape management plan – creating the ground works for management of vegetation, detailing the process from first implementation through to continual/ongoing maintenance required in the future.
- d) Bushfire sprinkler systems for the accommodation buildings and precincts.
- a) Identification/signage within Minninup Pool (sufficient lighting for night-time), the following are some examples: Access and egress of the park, emergency access ways, direction to onsite water locations (distance, direction, and what type of water source), any onsite firefighting equipment, evacuation/response plans, tracks unfit for 2WD vehicles, warning visitors of the bushfire risk when within the park.

- b) Where campfires (solid fuel fires) are being considered, creating a designated spot with suitable containment (e.g. fire pit) and signage identifying the permitted times of a year campfires can be lit, only within the designated containment area provided (at each designated spot).
- c) Onsite responsible managers or caretakers.
- d) Managers, general park staff and maintenance staff to undertake fundamental training for Bushfire Awareness including emergency procedures (This should also be considered for the contractors working within the facility during Bushfire season).
- e) PA system with visual strobes for site wide emergency evacuation.
- f) Dedicated built-in drafting points where vehicle access is possible.

10) Implementation:

Further reporting and documentation are required (*Bushfire Management Plan, Emergency Evacuation Plan, Risk Assessment and Bushfire Landscape Management Plan*) to facilitate development approvals for the sites.

Suggestions for future design and planning of the two proposed sites:

- Consideration of the value and condition of native vegetation within Minninup pools priority towards minimising excessive clearing.
- Any clearing or modification to onsite vegetation planned or approved to be undertaken the Shire of Collie or alternatively monitored and or audited to ensure the clearing is done in accordance with the approved conditions.
- Utilising the initial ground works as the standards for both sites, by implementing reporting that captures vegetation management requirements, (guidelines – this could be derived from potential “Bushfire Landscape Management Plan”), including mapping to identify the area overall, site compliance auditing intervals, non-conformance warnings and when the report will be reviewed/updated.

As the project develops and the suggested reports are commissioned additional advice, recommendations and requirements will be identified during which time the design/details can be better defined.

11) References:

The following documents have been taken into consideration when developing this report:

- *State Planning Policy 3.7 – Planning in Bushfire Prone Areas* (Western Australian Planning Commission)
- *Guidelines for Planning in Bushfire Prone Areas* (Western Australian Planning Commission)
- *Position Statement: Planning in Bushfire Prone Areas – Tourism land use in Bushfire Prone Areas* (Western Australian Planning Commission)
- *Tourism Planning Guidelines* (Western Australian Planning Commission)
- *Planning Bulletin 83/2013 – Planning for Tourism* (Western Australian Planning Commission)
- *Planning Bulletin 49/2014 – Caravan Parks* (Western Australian Planning Commission)
- *Nature Based Parks: Licencing guidelines for developers and local government* (Department of Local Government, Sport and cultural Industries)
- *Local Planning Manual* (Western Australian Planning Commission)
- *Shire of Collie Local Planning Strategy*
- *Caravan Parks and Camping Grounds Act 1995*
- *Caravan Parks and Camping Grounds Regulations 1997*
- *Shire of Collie Minninup Pool Tourist Accommodation*
- *Minninup Pool Demand and Pre-feasibility Study, Brighthouse – The Shire of Collie and the Southwest Development Commission* (2019)

12) Disclaimer:

Due to possible changes with the Bushfire Planning and Policy Review – A review into the Western Australian Framework for Planning and Development in Bushfire Prone Areas, any advice or recommendations based on the current tourism position statement may require re-visiting when the policy review has been implemented. Within the position statement 'Table 2' provides framework for risk assessment, at this time there is no guideline or criteria developed by Western Australian Planning Commission. Bushfire Prone Planning (BPP) have developed and currently prepare their own risk assessment documentation using the framework and experience within the industry.

All surveys, forecasts, projections and recommendations made in this report associated with the proposed development are made in good faith based on information available to Bushfire Prone Planning at the time. All maps included herein are indicative in nature and are not to be used for accurate calculations.

13) Summary:

Minninup Pool would greatly benefit from receiving an update and upgrade to the current facilities, complimenting that work with the proposed short-term accommodation. Although this site provides a wonderful area for travellers and visitors, it is predominantly a high risk when evaluating against potential bushfires. This feasibility report provides for considerations and options with regards to compliance requirements for bushfire management for the sites. Further assessments against detailed designs, including risk assessments (where required) will provide the foundation and merit to confirm ability of compliance/performance for future development of these sites.

If you wish to clarify items in letter, please do not hesitate to contact this office.

Yours sincerely

Kathy Nastov



**Director
Bushfire Prone Planning**

AREA 1: “OLD HOCKEY GROUND”

Classified vegetation & BAL Contour Mapping

Figure 2 – Area 1 “Old Hockey Ground” existing BAL Contour Map

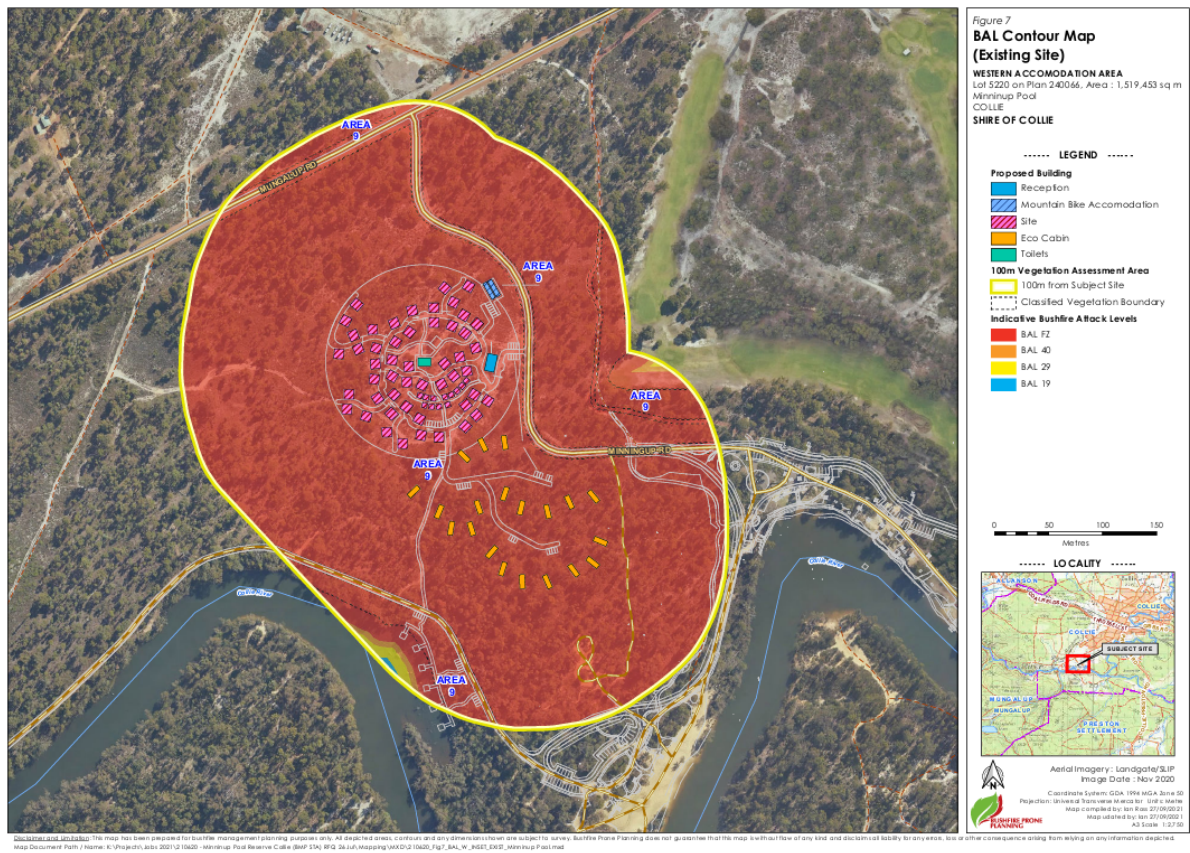


Figure 3 – Area 1 “Old Hockey Ground” potential post development topography and classified vegetation

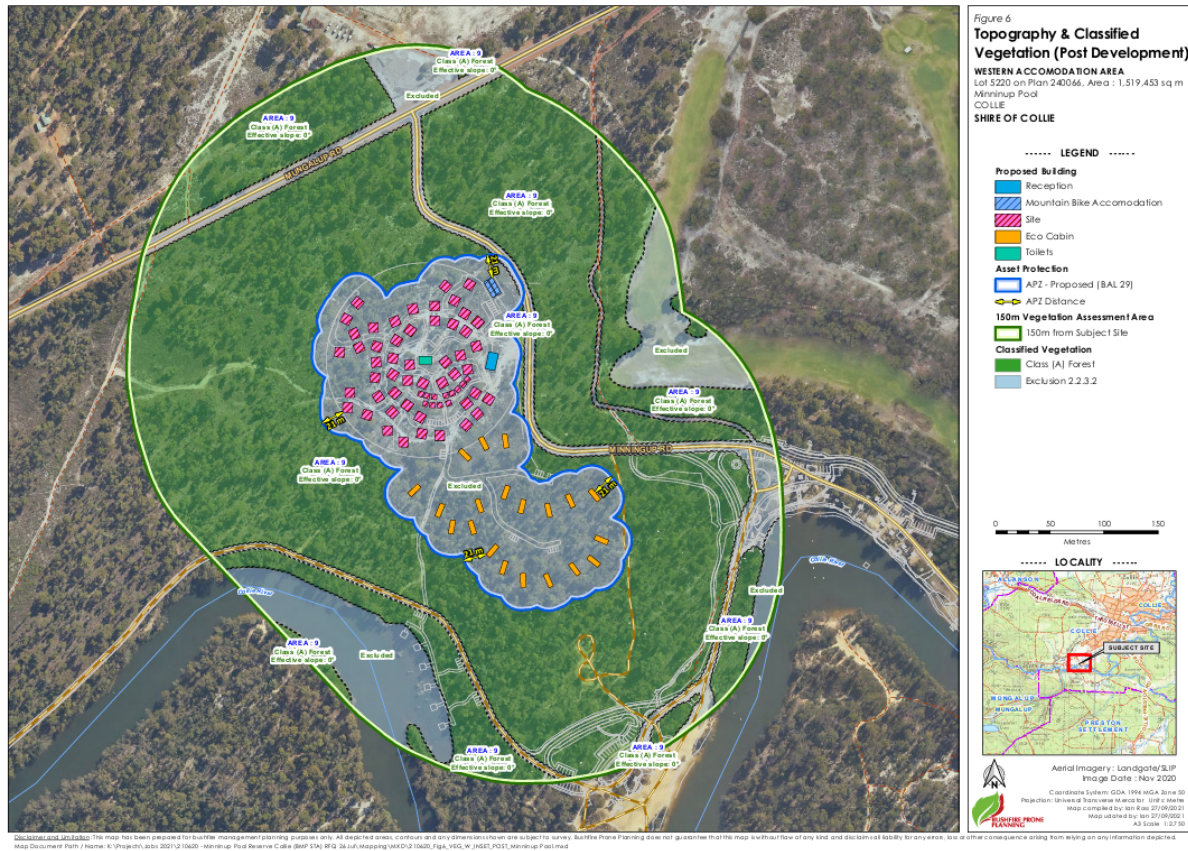
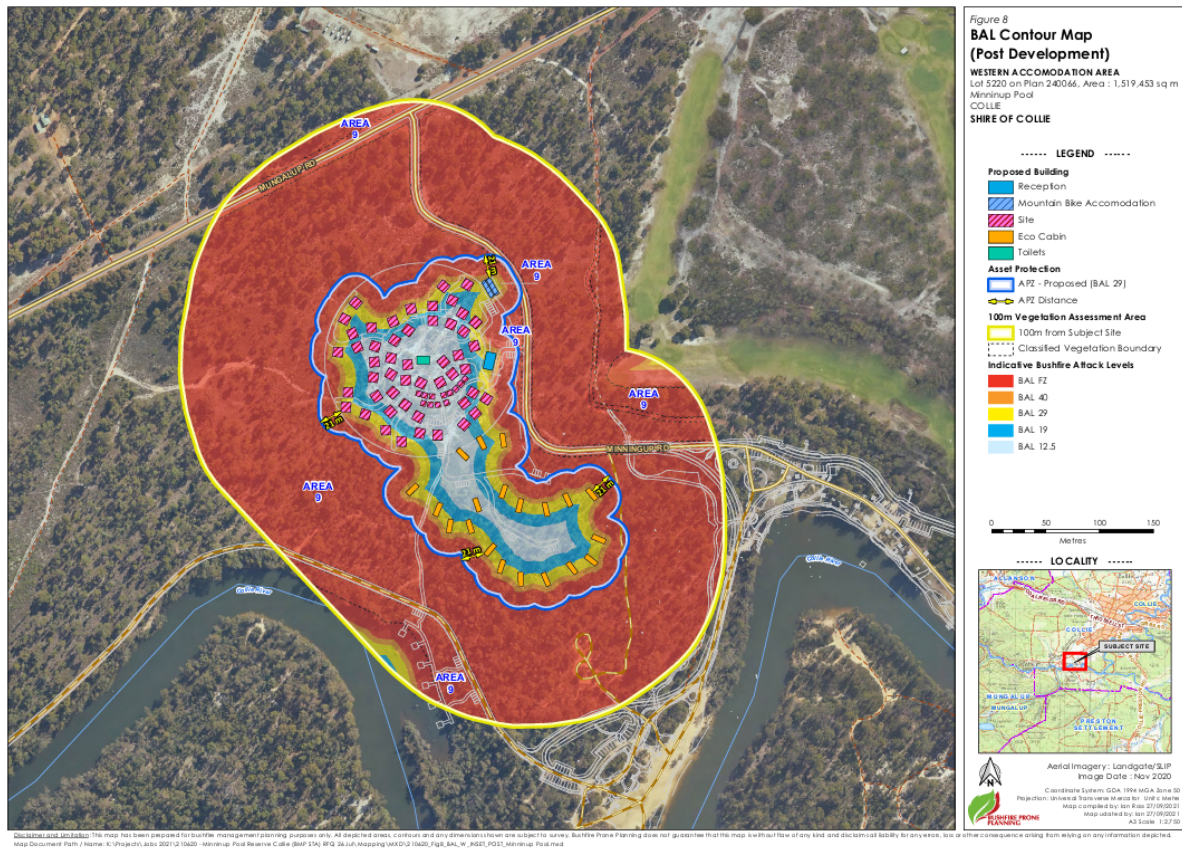


Figure 4 – Area 1 “Old Hockey Ground” potential post development BAL Contour Map



AREA 2: “KINGS PARK”

Classified vegetation & BAL Contour Mapping

Figure 5 – Area 2 "Kings Park" existing topography and classified vegetation

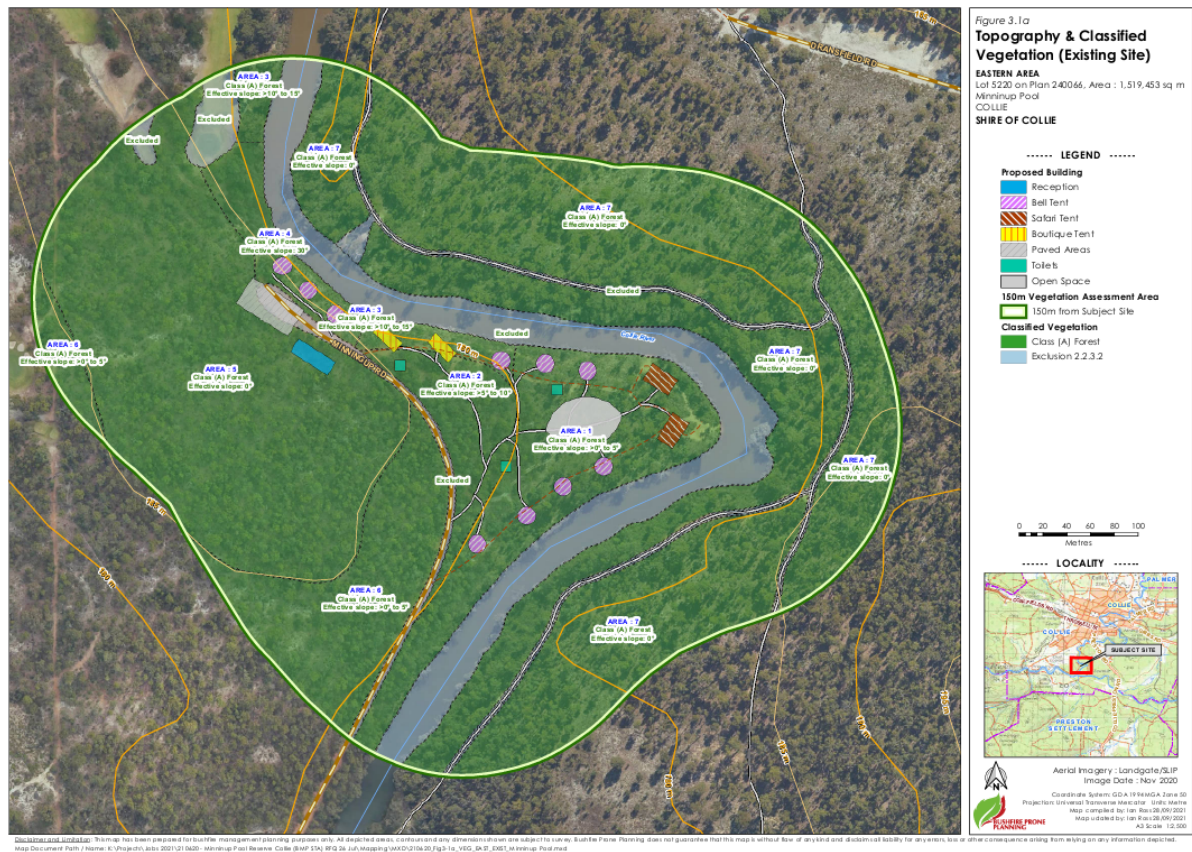


Figure 6 – Area 2 "Kings Park" existing BAL Contour Map

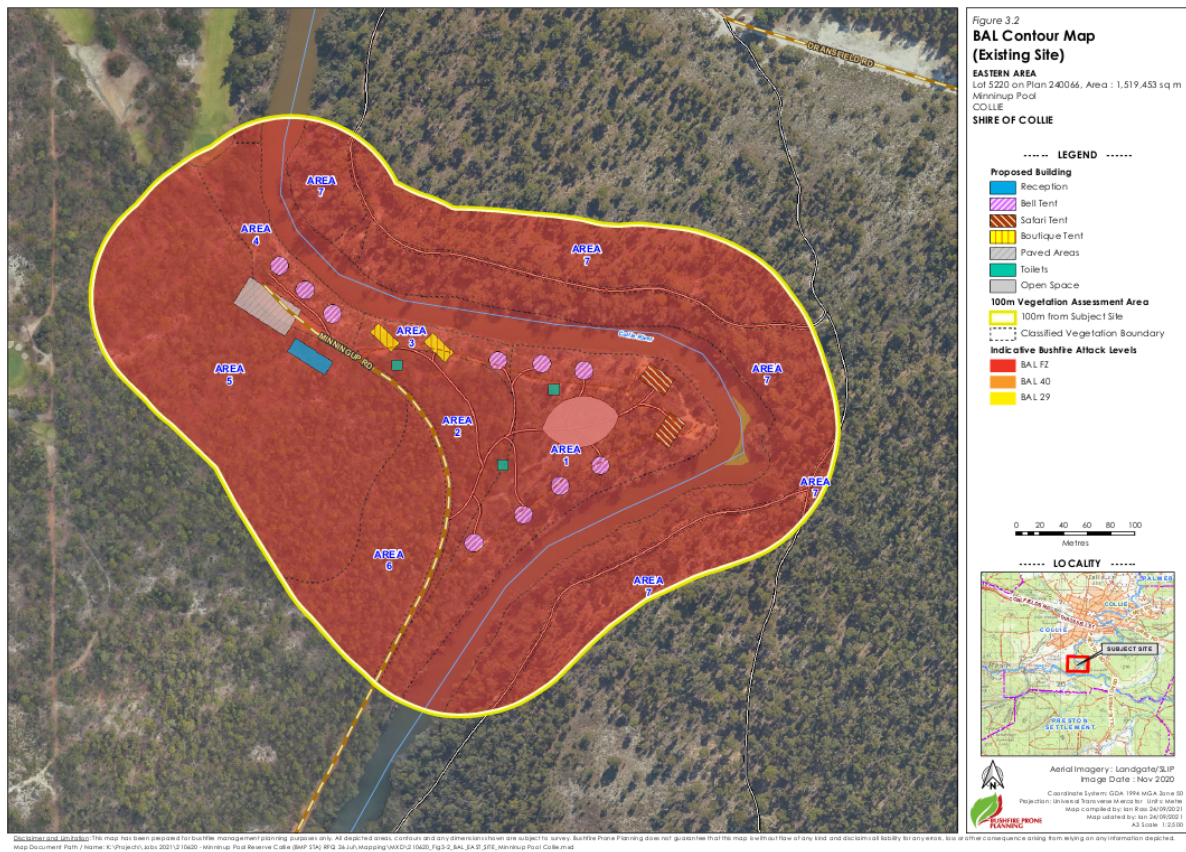


Figure 7 – Area 2 “Kings Park” potential post development topography and classified vegetation



Figure 8 – Area 2 "Kings Park" potential post development BAL Contour Map

