



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Department of Planning, Lands and Heritage,  
bushfirereview@dplh.wa.gov.au

14 July 2023

To whom it may concern,

### **Re: Draft SPP 3.7 and Planning of Bushfire Guidelines**

Thank you for the opportunity to comment on draft State Planning Policy 3.7: Bushfire and Planning for Bushfire Guidelines. The Wildflower Society of Western Australia appreciates the Department's acknowledgements of our environmental values and the importance and legal obligations to protect them in these draft documents. We have provided specific commentary in the attached versions of the draft documents.

To further protect our remnant native vegetation and ecological values, we have the following recommendations:

Consideration should be given to encouraging the retention of vegetation within road reserves, including significant trees. Some pinch points, where horizontal clearance is not met, could be allowed for the preservation of these important environmental values, without significantly increasing the bushfire risk of an area. This could also apply to the horizontal clearance of other access ways, including private driveways and emergency access ways.

Construction of habitable buildings within existing lots to BAL-40 or BAL-FZ to protect environmental values should also be allowable, even if the lot was created post 2015. There are many circumstances where the level of clearing required to achieve a BAL-29 rating would be much greater now than what was considered at the time of subdivision approval, including changes to AS3959 and the level of detail that is now expected in Bushfire Management Plans and BAL Assessments.



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The ability for the Asset Protection Zone standards of the local governments Firebreak Notice to be adopted in place of the standards detailed in the Guidelines is applauded. It is suggested that the standards in the firebreak notice at the date of approval are 'locked in', to ensure that any future changes to the firebreak notice do not change the ecological or bushfire risk outcomes for the site.

The retention of native vegetation and planting of locally indigenous flora species within Asset Protection Zones should be encourage, including retaining large trees that provide habitat for some of our threatened fauna species, including Black Cockatoos and Western Ringtail Possums.

Thank you again for the opportunity to provide feedback on the draft documents. If you have any questions about our comments please contact the Society using the details below.



<http://www.wildflowersocietywa.org.au/>

Reference