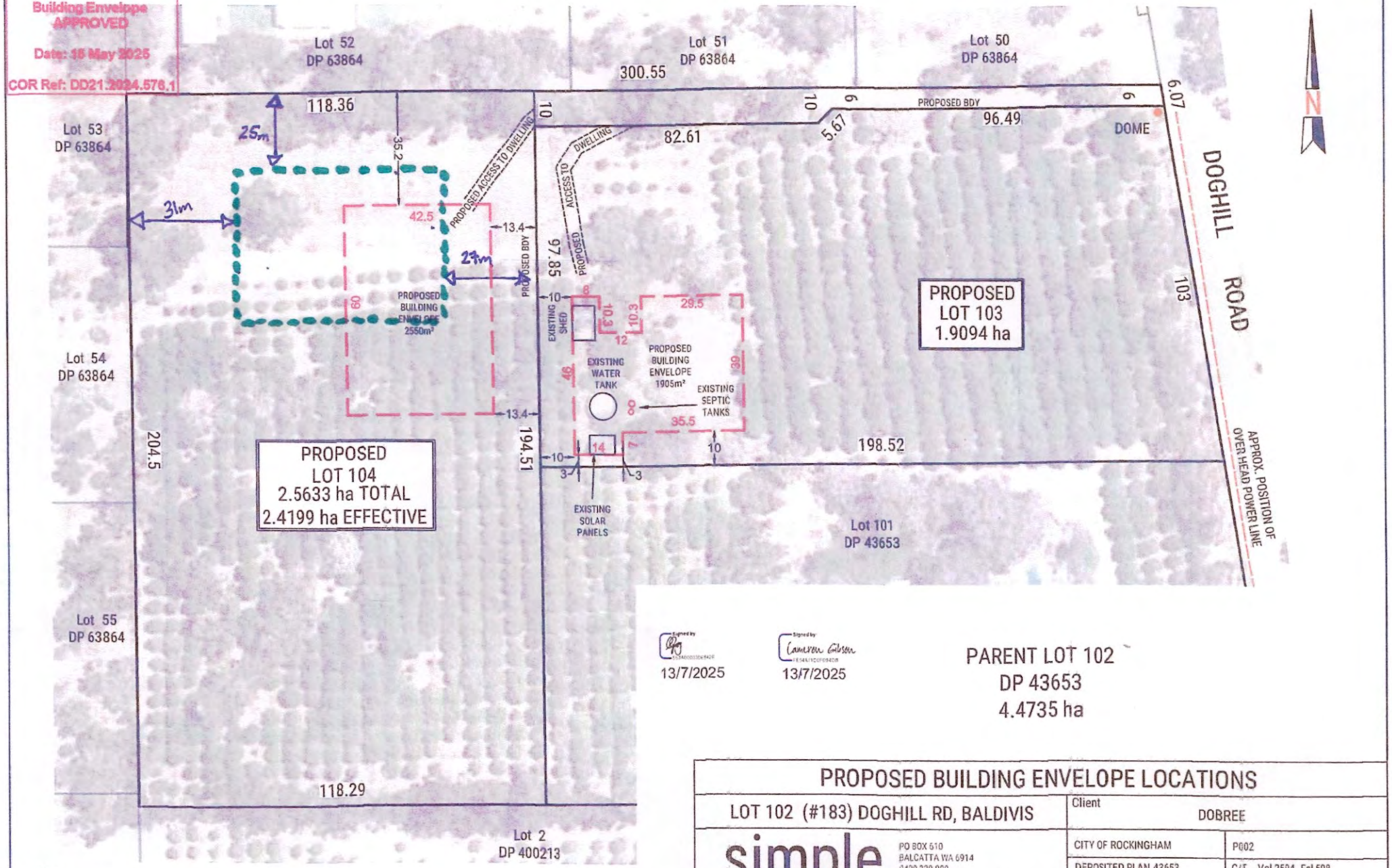
Docusign Envelope ID: C18A1329-C83B-437B-A3AA-A662C2264E13

CITY OF ROCKINGHAM
Building Envelope APPROVED
Date: 15 May 2025
COR Ref: DD21.2024.576.1



13/7/2025

13/7/2025

PARENT LOT 102
DP 43653
4.4735 ha

NOTES:
- THE ACCURACY OF THE AERIAL IMAGERY CAN NOT BE GUARANTEED

PROPOSED BUILDING ENVELOPE LOCATIONS

LOT 102 (#183) DOGHILL RD, BALDIVIS		Client: DOBREE	
simple LAND SOLUTIONS	PO BOX 510 BALCATTA WA 6914 0499 320 999 hello@simplelandsolutions.com.au	CITY OF ROCKINGHAM	P002
		DEPOSITED PLAN 43653	C/T Vol 2594 Fol 598
		SURVEY DATE N/A	DRAFTING DATE 10/12/24
Scale 1:1000@A3	10 0 10 20 30 40 50	Job ref SLS-240050	Rev J — Sheet 1 of 1

APPLICATION TO VARY THE LOCATION OF AN APPROVED BUILDING ENVELOPE

Written submission prepared under clause 5(b) of City of Rockingham
Planning Policy No. 3.3.17 – Variations to Building Envelopes

1. Application summary

Subject land	Lot 104 (No. 181) Doghill Road, Baldivis WA
Local government	City of Rockingham
Zoning	Special Rural (Town Planning Scheme No. 2)
Lot area	Approximately 2.5641 ha
Registered proprietors / applicants	Cameron and Christelle Gibson
Applicant contact	Cameron: 0424641561 / cjccjgibson@gmail.com
Existing approved building envelope	Approved by the City of Rockingham on 15 May 2025 (COR Ref DD21 2024.576.1); created through subdivision of parent Lot 102 (No. 183) Doghill Road (WAPC Ref 200578, approved 14 November 2024)
Nature of this application	Variation to the location of the approved building envelope. No increase in the size (area) of the envelope and no change to its regular, single-area shape.
Date of submission	30 July 2026

2. Purpose of this submission

Cameron and I are the registered owners of Lot 104 (No. 181) Doghill Road, Baldivis. We provide this written submission in support of our application to vary the location of the approved building envelope on our lot, in accordance with clause 5(b) of the City of Rockingham Planning Policy No. 3.3.17 *Variations to Building Envelopes* (the Policy). We have prepared it to describe the proposal and to explain, as best we can, how we believe the requirements of the Policy are met. We would welcome the City's guidance on anything further required from us to support the application.

In summary, we believe the proposed variation:

- avoids the removal of approximately 109 established macadamia trees that provide a seasonal food source for three threatened black cockatoo species, and so improves on the environmental outcome of the currently approved envelope;
- does not increase the bushfire risk, with the assessed Bushfire Attack Level (BAL) unchanged, and slightly increases the separation between the dwellings on Lots 103 and 104;
- does not, in our view, cause any unacceptable amenity impact to our neighbours, three adjoining owners provided written confirmation that they have no objection; and
- addresses each of the assessment criteria in clause 4.1.1 of the Policy.

3. Background

Lot 104 was created through the subdivision of the parent lot, Lot 102 (No. 183) Doghill Road (WAPC Ref 200578, approved 14 November 2024), which was carried out by the previous owner.

The building envelope currently approved on the lot was fixed as part of that subdivision and approved by the City on 15 May 2025 (COR Ref DD21 2024.576.1), before we purchased the land.

Lot 104 and the adjoining lots form part of an established macadamia orchard. Cameron and I intend to keep and continue caring for the orchard. We manage it as a rural lifestyle pursuit rather than as our principal source of income, which we earn from off-site employment, and we value it as much for its contribution to the rural landscape and as wildlife habitat as for any produce it provides.

We understand that Town Planning Scheme No. 2 defines a building envelope as the area within a lot within which *all buildings and effluent disposal facilities* must be contained. Our lot is not currently connected to water or sewer service, therefore the dwelling needs on-site rainwater storage and an on-site effluent disposal (septic) system, all of which must sit within the building envelope. For this reason the full footprint of the approved envelope would need to be cleared.

Building within the currently approved envelope would require the removal of approximately 109 established macadamia trees.

4. The proposed variation

We propose to vary the location of the approved building envelope by rotating it to an alternative position within our lot, as shown on the attached plans.

- **Same size and shape:** our proposed envelope is the same area and the same regular shape as the approved envelope, and remains a single, regular area. We are not seeking any increase in the size of the envelope.
- **Much less clearing:** the proposed location requires the removal of only about 6 immature, non-fruiting macadamia trees, and avoids the loss of approx. 109 established, fruit-bearing trees that would otherwise have to be cleared.
- **Bushfire assessment unchanged:** we obtained a revised Bushfire Management Plan for the proposed envelope (Bushfire Logic, BMP/2026-27 Version 1.1, 16 June 2026). The dwelling achieves BAL-12.5 and the envelope sits within an area of BAL-29 or below. The BAL rating has not increased as a result of the relocation.

5. Assessment against clause 4.1.1 of Planning Policy 3.3.17

We understand the City assesses a variation against the criteria in clause 4.1.1 of the Policy. We have attempted to address each of these below:

Policy criterion (clause 4.1.1)	How the proposal addresses the criterion
(a) Application complies with Town Planning Scheme No. 2	We understand the proposal is consistent with TPS No. 2. The land remains in Special Rural use and the proposed single house is an appropriate residential use in the zone. The Scheme allows the City to require building envelopes and to vary their location and size at its discretion. The variation does not change the intensity of development on the lot.
(b) and (c) No adverse environmental impact and the Council's objectives for the locality are realised	We believe the variation avoids environmental harm and improves on the approved outcome. It reduces clearing from approx 109 mature fruiting trees to about 6 immature trees and retains a food source used by black cockatoos, together with the orchard canopy. We are not aware of any native vegetation or matter of environmental significance being

Policy criterion (clause 4.1.1)	How the proposal addresses the criterion
	affected (see Section 6). We hope this is consistent with the City's objectives for the locality and with the Urban Forest Strategy 2025-2030.
(d) No unacceptable level of bushfire risk (WAPC Planning for Bushfire Protection Guidelines)	We obtained a revised Bushfire Management Plan for the proposed envelope adjustment, prepared under State Planning Policy 3.7 and the WAPC Planning for Bushfire Protection Guidelines. The dwelling achieves BAL-12.5 and the envelope sits within BAL-29 or below, with no increase in the BAL rating (see Section 8).
(e) No unacceptable amenity impacts to neighbours	The proposed envelope keeps substantial rural setbacks, retains screening orchard and other trees around the dwelling, involves a low-scale house with no unreasonable overlooking or overshadowing, contains all services on-site and does not change access. Three adjoining owners have returned the City's Adjoining Property Owner Comment Form advising they have no objection. We do not believe the proposal causes any unacceptable amenity impact (see Section 7).
(f) The variation results only in a minor increase in size (maximum 10% of the original area)	There is no increase in the size of the building envelope. The area is unchanged and only the location is varied.
(g) The building envelope is of a regular shape and comprises one single area	The proposed envelope remains a single, regular area of the same dimensions as the approved envelope.
(h) Golden Bay and Singleton rural attributes and appearance	We understand this criterion relates to the Golden Bay and Singleton areas and does not apply to our land, which is in Baldivis.

6. Environmental considerations

Criteria (b) and (c) of the Policy concern environmental impact, and this is the main reason for our request. The currently approved envelope would require us to clear a large part of an established orchard, whereas the proposed envelope avoids almost all of that clearing.

6.1 Avoiding unnecessary tree loss

We understand the City's planning framework encourages avoiding the removal of established vegetation where a reasonable alternative exists. Our proposal is such an alternative. It reduces the number of macadamia trees to be removed from approx. 109 mature macadamia trees to about 6, and the few trees to be removed are immature and not yet fruiting. The rest of the orchard and land bearing trees, and their canopy, would be retained, with further native tree planting planned.

6.2 Foraging habitat for three threatened black cockatoo species

The City kindly provided us with the Commonwealth *Referral guideline for 3 WA threatened black cockatoo species* (DAWE 2022). It covers Carnaby's Cockatoo (*Zanda latirostris*, Endangered), Baudin's Cockatoo (*Zanda baudinii*, Endangered) and the Forest Red-tailed Black-cockatoo (*Calyptorhynchus banksii naso*, Vulnerable), all listed under the *Environment Protection and Biodiversity Conservation Act 1999*, and it notes that the population of all three is declining.

Two points from that guideline are relevant to our orchard:

- **Macadamia is listed as a food source.** The guideline lists Macadamia (Macadamia spp.) among the foods of both Baudin's and Carnaby's Cockatoos - the orchard provides a foraging resource for these species.
- **Loss of this kind of foraging habitat is treated as a concern.** The guideline treats the loss of exotic foraging habitat used by black cockatoos as a threatening process and treats the loss of one hectare or more of such habitat as likely to require referral to the Commonwealth Minister. Keeping the orchard as intact as possible avoids that loss.

The bushfire assessment describes the surrounding vegetation as Class B Woodland (eucalypt and peppermint woodland), which is the kind of habitat these birds nest and roost in. The guideline explains that foraging resources are most valuable when they are close to breeding and roosting habitat and where habitat remains connected across the landscape. Keeping the orchard preserves a food source close to that surrounding woodland. As the orchard is not run as a commercial enterprise, we are content for it to be shared with local wildlife, including the black cockatoos, and have no wish to exclude them from it.

6.3 Keeping tree canopy in line with the City's urban forest direction

We understand the City's Urban Forest Strategy 2025-2030 sets out a framework for protecting and expanding tree canopy for its ecological, social and economic value, including food and shelter for wildlife, and that the City is considering a Tree Protection Policy. We also understand the City's planning controls already require approval to remove native vegetation, including individual trees within a building envelope, on Special Rural land. Although our macadamia trees are an exotic crop rather than native vegetation, we hope our proposal to keep them sits comfortably with the City's direction of retaining canopy and avoiding unnecessary tree loss.

6.4 No impact on matters of environmental significance

The environmental dataset review in our Bushfire Management Plan confirms that the lot does not contain or adjoin any mapped wetlands, Waterway Control Area, Commonwealth Threatened Ecological Community, EPBC-listed fauna habitat, Bush Forever site, DBCA-managed land or conservation covenant. The Bushfire Management Plan also confirms that the Asset Protection Zone can be provided with no impact on native vegetation. On this basis we are not aware of any adverse environmental impact, and we believe the variation results in an environmental improvement.

7. Amenity considerations

Criterion (e) asks whether there is any unacceptable amenity impact to neighbours. We have design the proposal to avoid this, for the following reasons:

- **Generous rural separation.** Our lot is a large Special Rural lot of about 2.56 ha, and dwellings in this zone are well separated. The proposed envelope keeps substantial setbacks from all lot boundaries.
- **Retained screening and rural character.** The mature orchard and other mature tree types kept around the dwelling screens and softens the built form and helps maintain the rural landscape character of the area, which we understand the Policy values.
- **Low-scale house.** The proposed dwelling is a single storey home. At rural separation distances, and with the screening orchard and trees retained, we do not believe it causes any unreasonable overlooking, loss of privacy, loss of outlook or overshadowing of a neighbouring property.

- **On-site services.** All water storage and effluent disposal will be contained within the building envelope and set back in line with the City's Health Services requirements, so there is no amenity or health impact on neighbours.
- **No change to access.** The dwelling continues to be served by the existing battleaxe driveway (shared with lot 103) from Doghill Road, so there is no change to access, traffic or associated noise.
- **Better separation from Lot 103.** The relocation increases the separation between our proposed dwelling and the approved envelope on adjoining Lot 103, which we hope reduces any sense of crowding between the two lots and assists in bushfire management.

Cameron and I have sought feedback from neighbours, and three adjoining owners have advised that they have no objection to the proposal. For the reasons above we do not believe the variation causes any unacceptable amenity impact.

8. Bushfire risk and building separation

Criterion (d) asks that the varied envelope not create an unacceptable level of bushfire risk. We obtained a revised Bushfire Management Plan for the proposed envelope adjustment (Bushfire Logic, BMP/2026-27 Version 1.1, 16 June 2026), which shows the following:

- The assessment was undertaken in accordance with State Planning Policy 3.7 and the WAPC Planning for Bushfire Protection Guidelines, and the proposal was assessed against, and meets, the applicable elements of Bushfire Protection Criteria 6 (Siting and Design, Vehicular Access and Water).
- The dwelling achieves BAL-12.5 and the building envelope sits within an area of BAL-29 or below. The BAL rating is not increased by the relocation.
- The required Asset Protection Zone can be provided within the lot with no impact on native vegetation. The existing battleaxe driveway (between 6 to 10 metres wide, with a turning area) provides emergency vehicle access.

As an incidental benefit, relocating the envelope increases the separation between our proposed dwelling and the approved envelope on adjoining Lot 103. In a designated Bush Fire Prone Area, greater separation between dwellings assists with dispersing built assets and can reduce radiant heat exposure between neighbouring homes.

10. Neighbour engagement and support

We have sought feedback from our neighbours about the proposal and invited their comment using the City's Adjoining Property Owner Comment Form. Adjoining owners have returned the form advising that they have no objection to the proposal. Their completed forms are attached (Attachment 4). The owners who have provided comment are:

- 183 Doghill Road, Baldivis
- 201 Doghill Road, Baldivis
- 1 Redrup Road, Baldivis

As noted above, the relocation also increases the separation between our proposed dwelling and the adjoining Lot 103 envelope (183 Doghill Road), which we hope is of benefit to both lots. Should any further feedback be provided to us, we will forward these to the City.

11. Conclusion

Our proposal moves the approved building envelope to a new position within our lot, without any increase in its size and without changing its regular, single-area shape, so that we can avoid clearing approx 109 established macadamia trees.

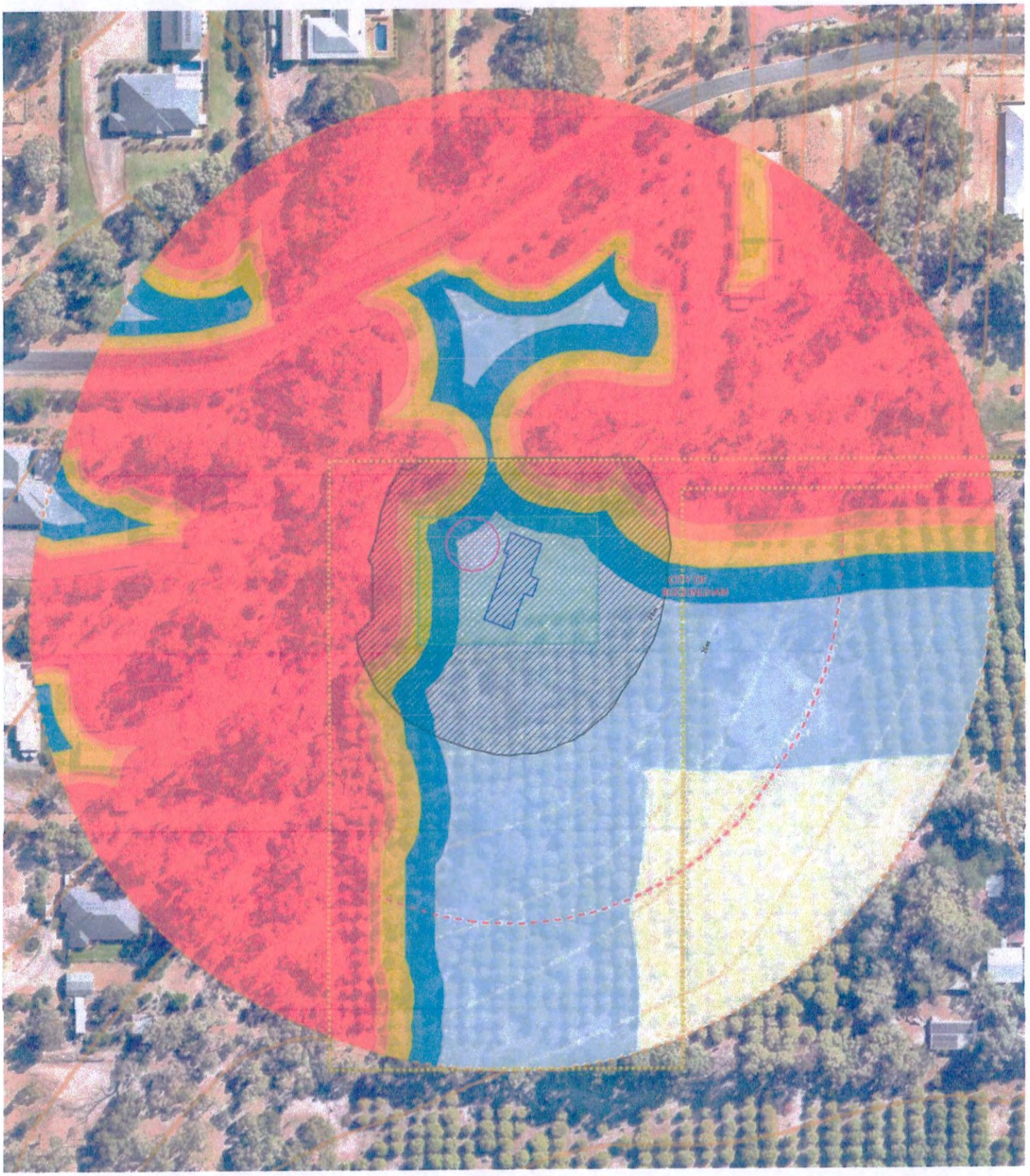
We have attempted to address each criterion in clause 4.1.1 of Planning Policy 3.3.17. We believe the proposal is consistent with Town Planning Scheme No. 2; that it avoids environmental harm and improves on the approved outcome by keeping a food source used by three threatened black cockatoo species and retaining tree canopy in line with the City's Urban Forest Strategy 2025-2030; that it maintains an acceptable level of bushfire risk with no increase in the assessed BAL; and that it causes no unacceptable amenity impact to our neighbours, whom have already advised they have no objection.

We would be very grateful if the City would approve the variation to the location of the building envelope on Lot 104 (No. 181) Doghill Road, Baldivis. We are happy to provide any further information the City needs and to meet with officers to discuss the proposal if required.

References

- City of Rockingham, Planning Policy No. 3.3.17 – Variations to Building Envelopes.
- City of Rockingham, Town Planning Scheme No. 2.
- City of Rockingham, Urban Forest Strategy 2025-2030.
- Department of Agriculture, Water and the Environment (2022), Referral guideline for 3 WA threatened black cockatoo species: Carnaby's Cockatoo, Baudin's Cockatoo and the Forest Red-tailed Black-cockatoo.
- Western Australian Planning Commission (2024), State Planning Policy 3.7 – Bushfire, and Planning for Bushfire Protection Guidelines.
- Environment Protection and Biodiversity Conservation Act 1999 (Cth).

FIGURE 4: BUSHFIRE ATTACK LEVEL CONTOUR MAP
LOT 104 (NO.181) DOGHILL ROAD, BALDIVIS



Legend

- Photopoint
- 100m Assessment Boundary
- 150m Assessment Boundary
- Lot Boundary
- Proposed Building Envelope
- Asset Protection Zone
- Driveway and Turning Area

Bushfire Attack Level Contour

- BAL-FZ
- BAL-40
- BAL-29
- BAL-19
- BAL-12.5

N

Bushfire Logic

16 June 2026

Bushfire Management Plan Coversheet

This Coversheet and accompanying Bushfire Management Plan has been prepared and issued by a person accredited by Fire Protection Association Australia under the Bushfire Planning and Design (BPAD) Accreditation Scheme.

Bushfire Management Plan and Site Details

Site address / Plan reference:	Lot 104 (No.181) Doghill Road				
Suburb:	Baldivis	State:	WA	Postcode:	N/A
Local government area:	City of Rockingham				
Description of the planning proposal:	Building Envelope Relocation and Single House				
BMP / Reference number:	BMP/2026-27	Version:	V1.1	Date of issue:	16/1/2026
Client / Business name:	Cameron And Christelle Gibson				

Reason for referral to DFES[1]	Yes	No
Has the BAL been calculated by a method other than Method 1 as outlined in AS3959? (Tick *No* if AS3959 Method 1 has been used to calculate the BAL)		✔
Have any of the bushfire protection criteria elements been addressed through the use of an outcomes-based approach?		✔
Strategic planning proposal (including rezoning applications)		✔
Local planning scheme amendment containing supplementary provisions, additional to the deemed provisions for bushfire risk management		✔
Where a bushfire local planning policy, or variation to the acceptable solutions or the APZ is proposed		✔
Where there is a conflict of opinion between the decision maker and proponent		✔
Expert technical advice on bushfire behaviour, emergency management, or other occasions where bushfire technical advice is required to support planning decision-making		✔
Expert technical advice on bushfire matters referred to State Administrative Tribunal (SAT) or Development Assessment Panel (DAP)		✔
Comments on future buildings' compliance with FES Commissioner's operational requirement guidelines		✔
Decision maker discretionary referral, (e.g. renewable energy, hazardous materials, vulnerable land use)		✔

If the development is a special development type as listed above, explain why the proposal is considered to be one of the above listed classifications (E.g. considered vulnerable land-use as the development is for accommodation of the elderly, etc.)?

N/A

Note: The decision maker (e.g. local government or the WAPC) should only refer the proposal to DFES for comment if one (or more) of the above answers are ticked "Yes".

BPAD Accredited Practitioner Details and Declaration

Name	Accreditation Level	Accreditation No.	Accreditation Expiry
Jemma Douglas	Level 2	38400	February 2027

Company	Contact No.
Bushfire Logic	0410621291

I declare that the information provided within this bushfire management plan is to the best of my knowledge true and correct.

Signature of Practitioner Date 16 June 2026

[1] For more information please refer to DFES Referral to DFES Checklist

Bushfire Management Plan

Lot 104 (No.181) Doghill Road, Baldivis

City of Rockingham

Date: 16 June 2026

Bushfire Logic

ABN: 926 121 79165

LIMITATIONS STATEMENT

This report has been prepared in accordance with the Agreement between Bushfire Logic and the Client. This Bushfire Management Plan has been prepared for the sole purpose of supporting an application for development approval as it applies Lot 104 (No.181) Doghill Road, Baldivis (the Site). This report is not personal to the current applicants/landowners.

In undertaking this work the author(s) have made every effort to ensure the accuracy of the information used. Unless otherwise stated in the report, Bushfire Logic has not independently verified such information and cannot guarantee its accuracy or completeness. Within the limitations imposed by the scope of work, preparation of this report has been undertaken and performed in a professional manner, in accordance with generally accepted practices and using a degree of skill and care ordinarily exercised by reputable bushfire consultants under similar circumstances. No other warranty, expressed or implied, is made.

The measures contained in this Bushfire Management Plan, are considered to be minimum requirements and they do not guarantee that a building will not be damaged in a bushfire, persons injured, or fatalities occur either on the subject site or off the site while evacuating. This is substantially due to the unpredictable nature and behaviour of fire and fire weather conditions. Additionally, the correct implementation of the required bushfire protection measures will depend upon, among other things, the ongoing actions of the landowners and/or operators over which Bushfire Logic has no control. The growth, planting or removal of vegetation, poor maintenance of any fire prevention/mitigation measures, addition of structures not included in this report, or other activity can and will change the bushfire threat to all properties detailed in this report.

Should changes be made to the Site, a new Bushfire Management Plan will be required. 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 Logic at the time. All maps included herein are indicative in nature and are not to be used for accurate calculations. Notwithstanding anything contained therein, Bushfire Logic accepts no Liability, including Liability for Loss in connection with:

- A Claim, damage, or injury to property, or persons caused by fire;
- Further growth, planting or removal of vegetation on the Site;
- Poor maintenance of any fire protection measures;
- Additional structures not included in this assessment; or
- Any other activity that may change the bushfire threat level.

The Client and owner of the site acknowledge that they have been made aware of the exclusions above and that such exclusion of Liability is reasonable in all the circumstances.

This report is valid for a period of two years only from the date of its issue. All BAL ratings identified within this report are indicative only and are required to be verified at the time of construction of individual buildings to ensure appropriate setbacks have been achieve.

Document Control: Report Details		
Report version	Report Date	Version Details
V1.1	16 June 2026	Original
BPAD Practitioner	Jemma Douglas (Level 2)	BPAD-38400

TABLE OF CONTENTS

1. INTRODUCTION 1

1.1 LOCATION 1

1.2 DEVELOPMENT PROPOSAL 2

1.3 STATUTORY FRAMEWORK 3

2. ENVIRONMENTAL CONSIDERATIONS 4

2.1 NATIVE VEGETATION –MODIFICATION AND/OR CLEARING 4

2.2 REVIEW OF THE ENVIRONMENTAL DATA SETS 4

3. BUSHFIRE ASSESSMENT RESULTS 5

3.1 ASSESSMENT INPUTS 5

3.2 ASSESSMENT OUTPUT 6

4. IDENTIFICATION OF BUSHFIRE HAZARD ISSUES 11

4.1 BUSHFIRE CONTEXT AND LANDSCAPE FIRE RISK 11

5. ASSESSMENT AGAINST THE BUSHFIRE PROTECTION CRITERIA 13

5.1 COMPLIANCE TABLE 13

6. RESPONSIBILITIES FOR IMPLEMENTATION AND MANAGEMENT OF BUSHFIRE MEASURES 18

6.1 DEVELOPER/LANDOWNER RESPONSIBILITIES 18

7. CERTIFICATION 19

8. REFERENCES 20

LIST OF TABLES

Table 1: Environmental Dataset Review 4

Table 2: Vegetation Classification Table (as per AS3959:2018) 5

Table 3: AS3959:2018 BAL Rating for Proposed Single House 6

Table 4: Bushfire Protection Criteria Applicable to Subject Site 14

LIST OF FIGURES

Figure 1: Location Map for Subject Site 2

Figure 2: Map of Bushfire Prone Areas and relevance to subject site (OBRM, 2024) 3

Figure 3: Vegetation Assessment and Photo Points Map .....

Figure 4: Bushfire Attack Level Contour Map .....

Figure 5: Wind Rose Diagrams .....

LIST OF APPENDICES

Appendix 1: Vegetation Assessment and Classification

Appendix 2: Development Plans

1. INTRODUCTION

Bushfire Logic has been engaged on behalf of the landowners to prepare a Bushfire Management Plan (BMP) to support a development application for a building envelope relocation to facilitate the construction of a new single house at Lot 104 (No.181) Doghill Road, Baldivis within the City of Rockingham, who is the determining authority.

The site is within a declared Bush Fire Prone Area 2 (BFP2) and the proposed subdivision is required to be assessed for its compliance with State Planning Policy 3.7 – Bushfire (SPP 3.7) (WAPC, 2024) and the bushfire protection criteria contained within the Planning for Bushfire Guidelines (September 2024) (the Guidelines).

The intent of SPP 3.7 is: "to preserve life and reduce the impact of bushfire on property and infrastructure". This report will undertake an assessment using AS3959:2018 and against the applicable Elements set out within the Guidelines.

1.1 LOCATION

The subject lot is 2.5641ha in area and is zoned 'Special Rural' under City of Rockingham's Local Planning Scheme No.2 (LPS 2). The subject site is approximately 2.2km east of the Kwinana Freeway and the Baldivis residential zone.

<table>
<tr><td rowspan="2">Address Details</td><td>Street no.
181</td><td>Lot no.
104</td><td>Street name
Doghill Road</td></tr>
<tr><td colspan="3">Suburb & State

Baldivis, Western Australia</td></tr>
<tr><td>Local government area</td><td colspan="3">City of Rockingham</td></tr>
<tr><td>Site Area</td><td colspan="3">2.5641ha</td></tr>
<tr><td>Main BCA class of the building</td><td>1A</td><td>Use(s) of the existing building</td><td>Vacant Land</td></tr>
<tr><td>Description of the building or works</td><td colspan="3">Building Envelope Relocation and Single House</td></tr>
</table>

Figure 1: Location Map for Subject Site

1.2 DEVELOPMENT PROPOSAL

The proposal is for approval of the relocation of the building envelope and construction of a new single house on the subject lot (Appendix 2: Development Plans). The subject lot was created as part of a recent subdivision approval (WAPC Reference 200578) which was approved on 14 November 2024. The site and those adjoining contain an existing macadamia nut orchard which the current landowners are seeking to retain as part of the request to relocate the building envelope.

Existing land use	Vacant Land
Proposed land use:	Single House
Region Planning Scheme	Rural
Local Planning Scheme Zoning	Special Rural
Local Structure Plan:	N/A
Local Planning Policies:	N/A
State Planning Policy 3.7	Section 7(ii) – General Measures Bushfire Protection Criteria 6: Development – Residential

The 2023-2024 review of the Bushfire Prone Area Mapping introduced two distinct bush fire contexts. Area 1 comprises selected suburbs located on the Swan Coastal Plain within the Perth, Peel and Greater Bunbury Region Schemes. These are areas where the intensity of development and non-contiguous nature of vegetation reduces the risk of landscape scale bush fire. Area 2 comprises the remainder of the Western Australia. The publicly released Bushfire Prone Area Mapping (OBRM-023) shows that the site is located within Bush Fire Prone Area 2 and as such is subject to a planning assessment of the bushfire risks. The Bushfire Prone Area Mapping is shown in Figure 2.

Figure 2: Map of Bushfire Prone Areas and relevance to subject site (OBRM, 2024)

1.3 STATUTORY FRAMEWORK

This document and the recommendations contained within are aligned to the following policy and guidelines:

- *Planning and Development Act 2005;*
- *Planning and Development (Local Planning Scheme) Regulations 2015*;
- State Planning Policy (SPP) 3.7 – Bushfire (2024)
- Planning for Bushfire Guidelines (2024)
- *Building Act 2011*;
- *Building Regulations 2012*;
- Building code of Australia (National Construction Code);
- *Fire and Emergency Services Act 1998;*
- AS3959-2018 "Construction of buildings in bushfire-prone areas"; and
- *Bushfires Act 1954.*

2. ENVIRONMENTAL CONSIDERATIONS

2.1 NATIVE VEGETATION –MODIFICATION AND/OR CLEARING

A review of the environmental data sets as identified in the Department of Planning Lands and Heritage (DPLH) BMP Template has been undertaken and has not identified any regulated (restricted) vegetation that may be affected by the proposal, see Table 1 Environment Dataset Review.

2.2 REVIEW OF THE ENVIRONMENTAL DATA SETS

Table 1: Environmental Dataset Review

Vegetation Modification and/or Clearing Assessment		
Is modification and/or management of vegetation within the subject lot required?		Some clearing of vegetation will be required to implement the Asset Protection Zone (APZ) around the proposed dwelling.
Environmental Value	**Mapped as occurring within or adjacent to the project area**	**Description**
Wetlands	No	The subject lot is not listed as containing any mapped wetlands.
Waterway Control Area	No	The site is not located within the Swan-Canning Water Catchment Area.
Commonwealth Threatened Ecological Communities (TEC) listed under the *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act)	No	The site is not listed as containing any TEC.
Fauna habitat listed under the EPBC Act	No	The site is not listed as containing and protected fauna habitat.
Bush Forever Site	No	The site is not listed as containing or adjoining any Bush Forever Sites.
DBCA managed lands and waters	No	The site is not impacted by DBCA managed land or waters.
Conservation covenants	No	There are no existing conservation covenants in place for the subject lot.

3. BUSHFIRE ASSESSMENT RESULTS

The bushfire assessment for this site has followed the Bushfire Attack Level (BAL) Assessment and WAPC Planning in Bushfire Prone Areas Guidelines Version 1.4.

3.1 ASSESSMENT INPUTS

Bushfire Assessment inputs for the proposed development have been calculated using the Method 1 BAL Assessment procedures as outlined in AS3959:2018. This incorporates the following factors:

- WA adopted Fire Danger Index (FDI), being FDI 80;
- Vegetation Classes;
- Effective Slope under classified vegetation; and
- Distance between proposed development site and classified vegetation

3.1.1 Relevant Fire Danger Index (FDI)

The fire danger index for this site has been determined in accordance with Table 2.1 or otherwise determined in accordance with a jurisdictional variation applicable to the site.

Fire Danger Index			
FDI 40 ☐	FDI 50 ☐	FDI 80 ☒	FDI 100 ☐
Table 2.7	*Table 2.6*	*Table 2.5*	*Table 2.4*

3.1.2 Vegetation Classification

Two separate site assessments have been undertaken in December 2025 and June 2026. All vegetation within 150m of the proposed building has been classified in accordance with Clause 2.2.3 of AS 3959-2018. Each distinguishable vegetation plot with the potential to determine the Bushfire Attack Level is identified in the following pages and shown on Figure 3: *Vegetation Assessment and Photo Points Map* on the following page.

A summary of the plot data assessed as per Clause 2.2.3 of AS 3959-2018 is provided below in Table 2 below, detailed plot data is provided in Appendix 2.

Table 2: Vegetation Classification Table (as per AS3959:2018)

Plot	Vegetation Classification	Effective Slope
1	Class B Woodland	All upslopes and flat land (0 degrees)
2	Class B Woodland	Downslope >0-5 degrees
3	Class B Woodland	Downslope >5-10 degrees
4	Excluded 2.2.3.2 (e) & (f)	N/A

3.2 ASSESSMENT OUTPUT

3.2.1 Bushfire Attack Level Results

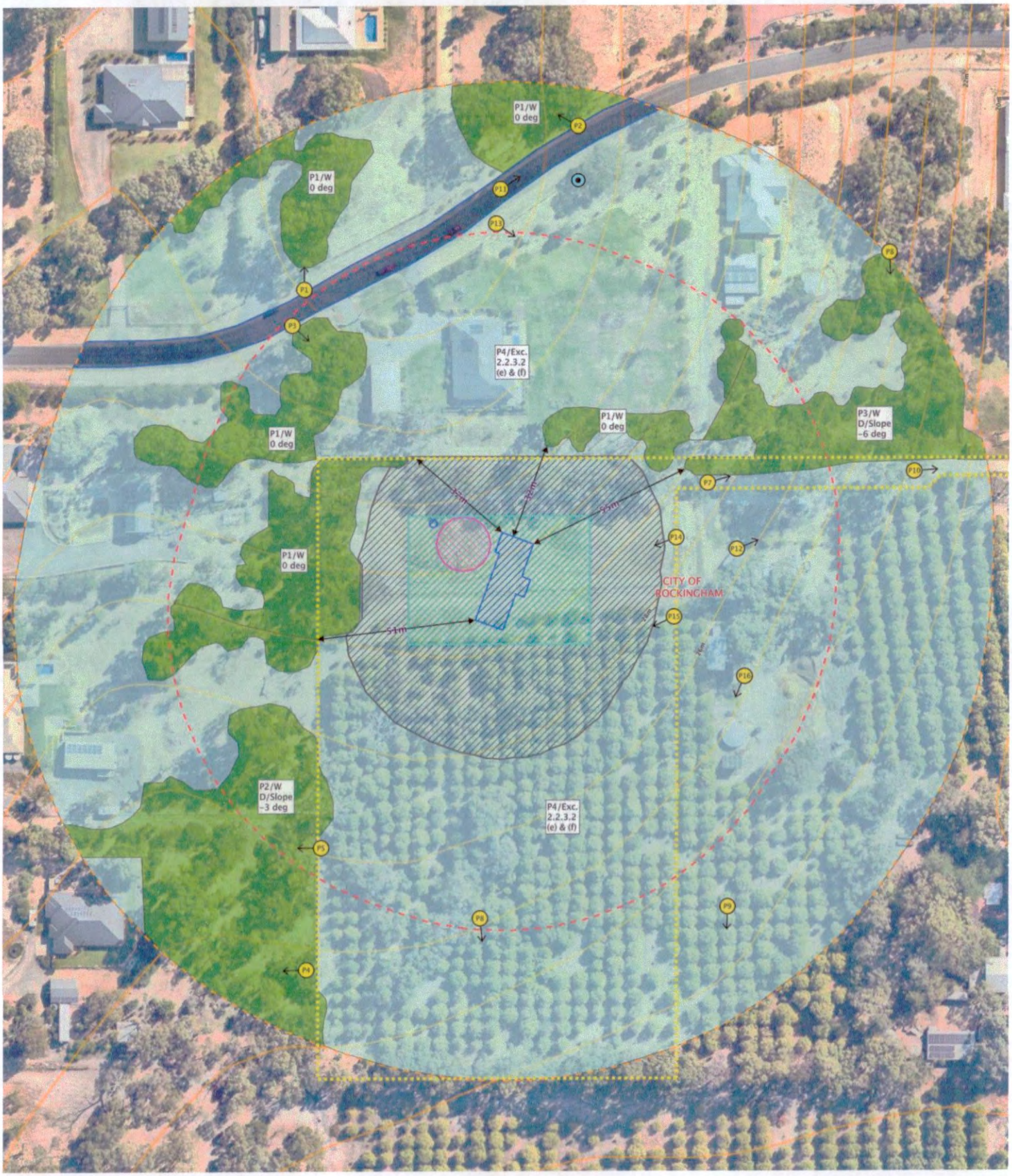
In accordance with SPP 3.7 and the Guidelines, Figure 4: *Bushfire Attack Level Contour Map* has been prepared to illustrate the radiant heat impacts from vegetation being retained within the assessment area for the proposed dwelling once completed. The vegetation assessment and BAL contour map have been completed in accordance with the Method 1 methodology of AS3959-2018.

Table 3 below provides an assessment of the BAL rating in accordance with the requirements of the SPP 3.7 and the Guidelines. The indicative BAL rating gives an indication of the level of bushfire attack (i.e. the radiant heat flux) that may be received by the proposed building. The assessed indicative BAL ratings are depicted as follows:

Table 3: AS3959:2018 BAL Rating for Proposed Single House

Plot No.	Vegetation Classification	Effective Slope	Dwelling Separation (m)	Indicative Dwelling Method 1 BAL Rating
1	Class B Woodland	All upslopes and flat land (0 degrees)	32m	BAL-12.5
2	Class B Woodland	Downslope >0-5 degrees	51m	BAL-12.5
3	Class B Woodland	Downslope >5-10 degrees	55m	BAL-12.5
4	Excluded 2.2.3.2 (e) & (f)	N/A	N/A	BAL-LOW

FIGURE 3: VEGETATION ASSESSMENT AND PHOTOPOINTS MAP
LOT 104 (NO.181) DOGHILL ROAD, BALDIVIS



Legend

- Photopoint
- 100m Assessment Boundary
- 150m Assessment Boundary
- Lot Boundary
- Proposed Building Envelope
- Approximate Building Outline
- Asset Protection Zone
- Driveway and Turning Area

Vegetation Classification

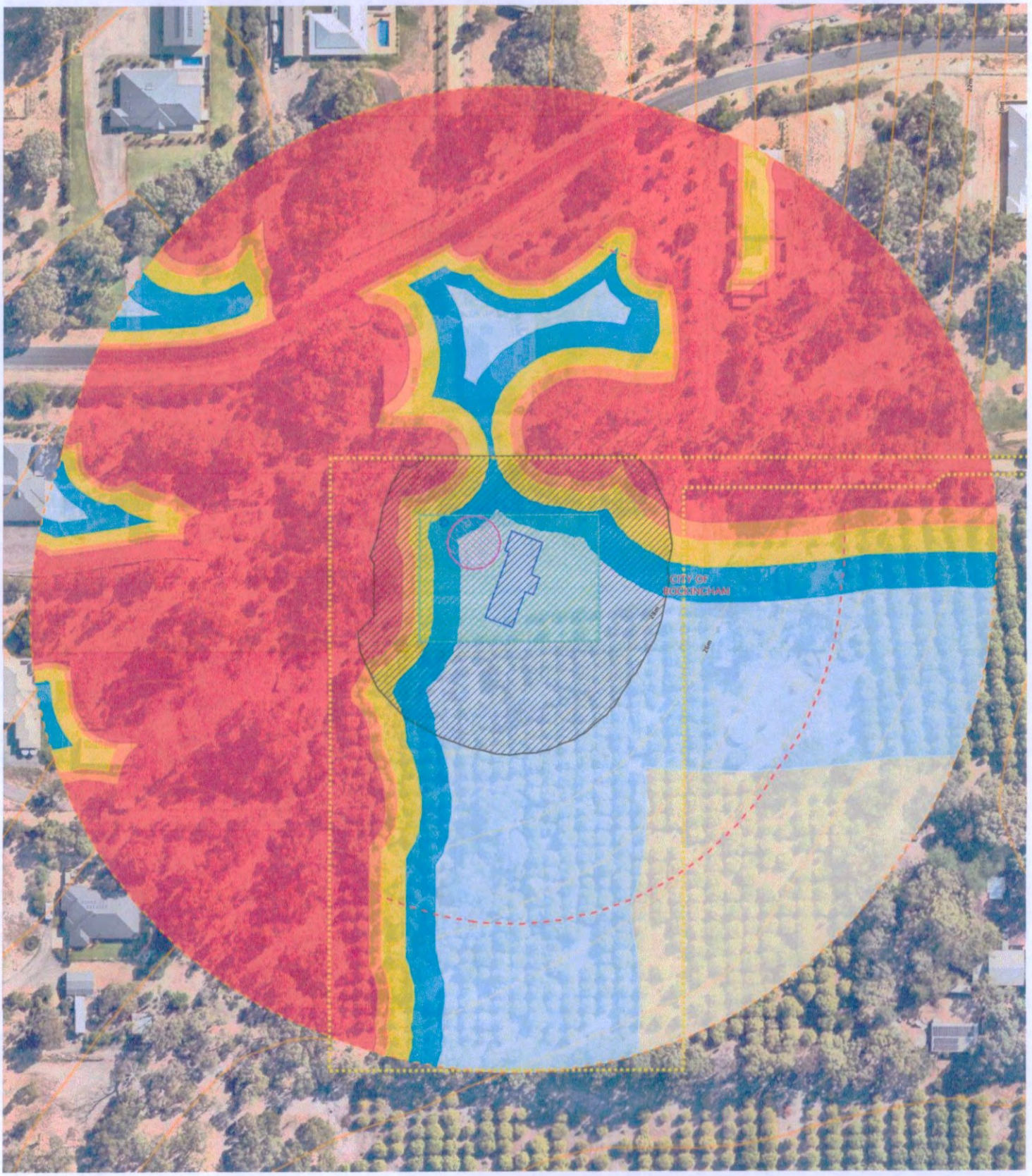
- Excluded 2.2.3.2 (e)
- Excluded 2.2.3.2 (f)
- Class B Woodland

N

Bushfire Logic

16 June 2026

FIGURE 4: BUSHFIRE ATTACK LEVEL CONTOUR MAP
LOT 104 (NO.181) DOGHILL ROAD, BALDIVIS



Legend

- Photopoint
- 100m Assessment Boundary
- 150m Assessment Boundary
- Lot Boundary
- Proposed Building Envelope
- Asset Protection Zone
- Driveway and Turning Area

Bushfire Attack Level Contour

- BAL-FZ
- BAL-40
- BAL-29
- BAL-19
- BAL-12.5

N

Bushfire Logic

16 June 2026

4. IDENTIFICATION OF BUSHFIRE HAZARD ISSUES

The purpose of this section is to identify any bushfire hazard issues through an examination of environmental considerations in addition to the bushfire risk assessment. Considerations can include vehicle access constraints both within and adjacent to the site, the location of significant bushfire hazards such as regional reserves or national parks and other relevant bushfire hazards. This is particularly relevant to strategic proposals where consideration of these sorts of factors can assist in determining the suitability of area for development and subdivision or identifying issues that may need to be considered in further detail as part of subsequent planning stages.

4.1 BUSHFIRE CONTEXT AND LANDSCAPE FIRE RISK

Bushfire behaviour is influenced by climate (including temperature, humidity and wind), topography, and the type and quantity of available fuel (vegetation). In this case, the primary bushfire risk to the subject site arises from vegetation within the surrounding Special Rural and Rural lots. Vegetation in the locality is generally consistent with Class B Woodland, with typical fuel loads ranging between 15 and 25 tonnes per hectare.

Wind direction and speed are key drivers of bushfire behaviour, influencing both the rate of spread and fire intensity. As wind speeds increase, greater oxygen supply can intensify fire behaviour. In the southwest of Western Australia, severe bushfire conditions most commonly occur between January and March, with extreme and catastrophic conditions typically developing during the afternoon. Accordingly, it is important to consider the prevailing summer wind conditions affecting the site. Wind rose data recorded by the Bureau of Meteorology (BoM) provides an indication of average wind speed and direction; in this instance, the Karnup weather station represents the closest and most relevant dataset for the subject site.

Wind rose data presented in Figure 5 indicates that, during the summer months (January to March), the prevailing winds and strongest gusts affecting the subject site are predominantly from the south-west. Strong south-easterly winds also occur, albeit less frequently, with occasional easterly influences in February and March. The highest average gusts were recorded in January, with an average 3pm wind speed of 14.4 km/h. Average maximum temperatures were consistent across January and February at 29.1°C.

Having regard to the prevailing wind conditions, the surrounding topography, and the availability of vegetation as a fuel source, there is a reasonable likelihood of bushfire impacting the subject site. While the proposed development has limited capacity to influence bushfire risk at a broader, landscape scale, this context is important in informing landowners' understanding of potential bushfire exposure and the need for appropriate mitigation measures.

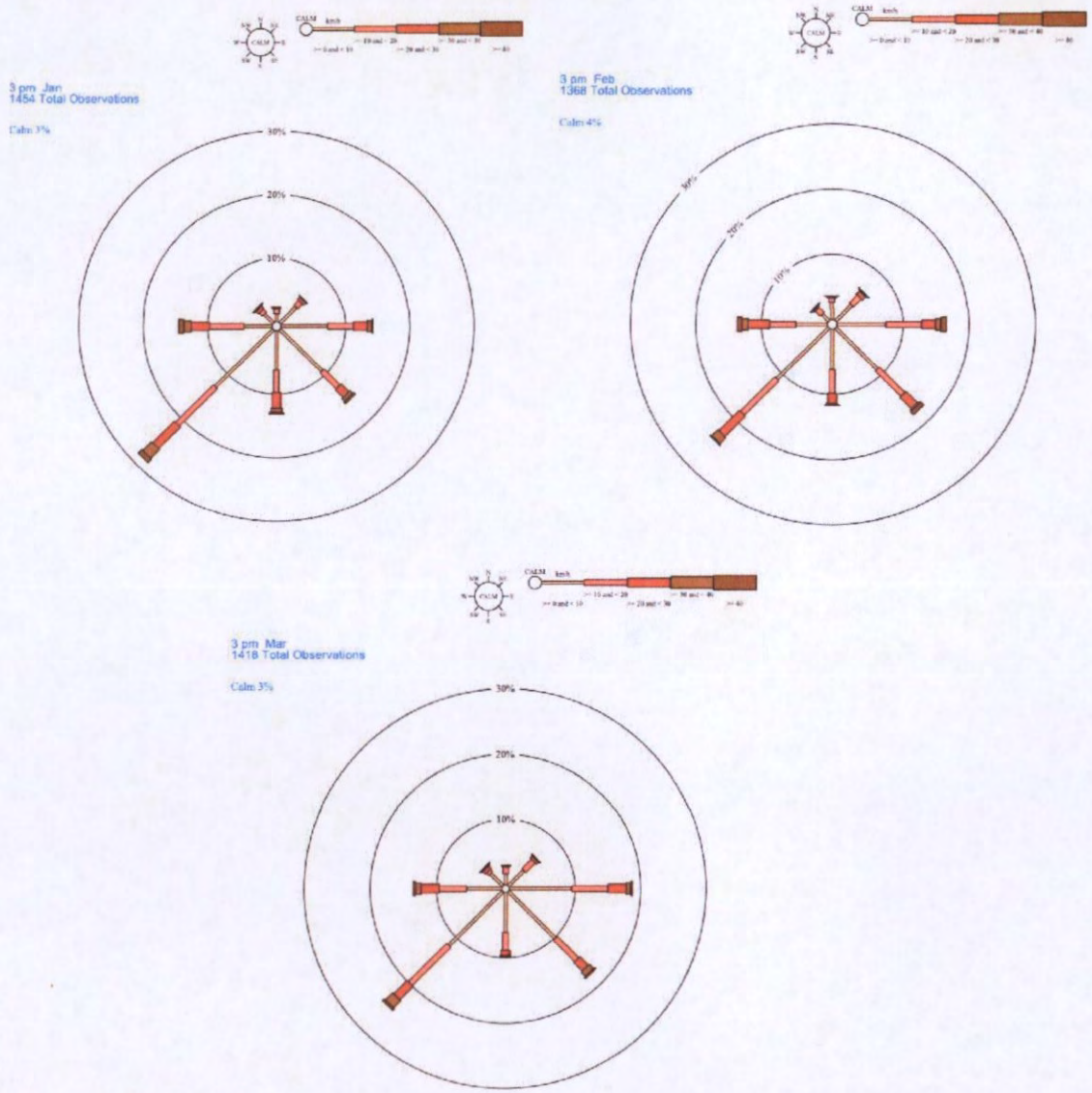


Figure 5: Wind Rose Diagrams

5. ASSESSMENT AGAINST THE BUSHFIRE PROTECTION CRITERIA

5.1 COMPLIANCE TABLE

The Guidelines outline different bushfire protection criteria for which strategic planning proposals, structure plans, subdivision and development proposals are to be assessed against for compliance. Development applications such as that proposed are required to be assessed in accordance with Bushfire Protection Criteria 6: Development - Residential (BPC 6). BPC 6 details acceptable solutions in accordance with the following three elements:

- Element 2 – Siting and Design;
- Element 3 – Vehicular Access; and
- Element 4 – Water.

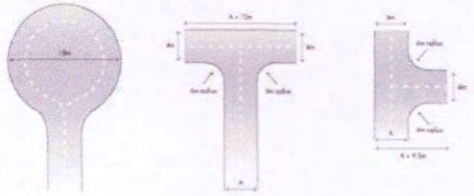
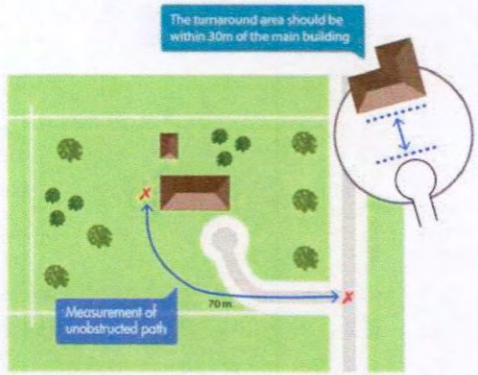
It is acknowledged that development applications have limited ability to alter the location in which they are proposed and therefore assessment under Element 1 – Location is not required.

The proposed development has been assessed against Elements 2 to 4 of the BPC 6 and found to be compliant, refer to Table 4.

Table 4: Bushfire Protection Criteria Applicable to Subject Site

ELEMENT	ACCEPTABLE SOLUTION	APPLICABLE YES/NO	PROPOSAL MEETS ACCEPTABLE SOLUTION
Element 1 - Location			
N/A	N/A	No	N/A Assessment under Element 1: Location is not required for a residential development application. Not required to be assessed to Element 1.
Element 2 – Siting and Design			
A2.1a Siting and Design OR A2.1b Siting in an area with a radiant heat impact exceeding 29kW/m2 (BAL-40 or BAL-FZ)	*Habitable building achieves radiant heat impact not exceeding 29kW/m2 (BAL-29)* *OR* *Siting of a residential habitable buildings, with a radiant heat impact exceeding 29 kW/m2 (BAL-40 or BAL-FZ). Should only be considered where:* • *Lot created prior to December 2015; and* • *There are demonstrated site characteristics and/or biodiversity or conservation values that prevent achieving BAL-29 or below; and* • *It is demonstrated that building reduction/redesign is not practical or appropriate.*	Yes	Compliant Figures 4 (Vegetation Assessment and Photo Points Map) and 5 (Bushfire Attack Level Contour Map) demonstrate that the proposed building envelope will be located within an area of BAL-29 or below while the proposed dwelling will be located within an area of BAL-12.5, consistent with the requirements of the Guidelines. An Asset Protection Zone (APZ) is not technically required to ensure the proposed building envelope and future dwelling achieve a BAL-29, however to ensure the rating does not increase over time, an APZ has been indicatively shown on Figures 4 and 5. Proposal meets Acceptable Solution A2.1a.

A2.2 Asset Protection Zone (APZ)	*Where a habitable building cannot be wholly within an area with a radiant heat impact not exceeding 29 kW/mÇ (BAL-29) in its predevelopment state, an APZ is to be provided.*	Yes	Compliant The proposed development does not require an APZ to be established to achieve a rating of BAL-29 or lower. Notwithstanding, to ensure that the BAL rating for the proposed building does not increase due to regeneration of vegetation within the subject land an APZ has been shown on Figures 4 and 5. The APZ width has been based on the construction BAL rating (BAL-12.5) that will apply to the proposed house. Vegetation within the APZ will be required to be maintained in accordance with the requirements of *Table 9 Asset Protection Zone (APZ) Technical Requirements* and an implementation requirement has been included within Table 6 of this report. It is anticipated that the Local Government will require the implementation of this BMP as a condition of development approval which will allow the ongoing enforcement of the BMP under both the *Planning and Development Act 2005* and the *Bushfire Act 1954*. Proposal meets Acceptable Solution A2.2.
A2.3 Clearing of native vegetation	*Development avoids, or where unavoidable, minimises the clearing of native vegetation*	Yes	Compliant The APZ can be implemented with no impact on native vegetation. Accordingly, vegetation modification is not required to ensure ongoing compliance with the requirements of the Guidelines. Proposal meets Acceptable Solution A2.3.
Element 3 – Vehicular Access			
A3.1 Private driveway	*The private driveway is to meet all of the following requirements:* • *requirements of Appendix B.3 Table 10, column 5; and* • *passing bays every 200 metres with a minimum length of 20 metres and a*	Yes	Compliant The design of the subject lot including the battleaxe driveway was assessed as part of the WAPC subdivision application and determined to be appropriate. The subject lot does not have a reticulated (mains) water connection and the driveway servicing the proposed dwelling is

	minimum additional carriageway width of 2 metres (i.e. the combined carriageway width of the passing bay and constructed private driveway is to be a minimum 6 metres); and • *turn-around area (Figure 30) and within 30 metres of the residential habitable building (Figure 38).* Figure 30: Design requirements for a turn-around area  Figure 38: Design requirements for a private driveway where required 		approximately 250 metres long. The driveway ranges from 6 metres to 10 metres in width and therefore complies with A3.1. An indicative turning space has been shown on Figures 3 and 4 to demonstrate that a fire appliance can enter and turn within the subject site in accordance with the requirements of the Guidelines, Figures 30 and 38. Proposal meets Acceptable Solution A3.1.
Element 4 – Water Supply			
A4.1 Water supply	*Where a reticulated water supply is existing or proposed, a hydrant connection(s) should*	Yes	Compliant

	be provided in accordance with the specifications of the relevant water supply authority. *Where these specifications cannot be met, a water tank(s) should be provided in accordance with the requirements of Appendix A.4, Table 11 – Water supply dedicated for bushfire firefighting.*		The subject site is not connected to the reticulated water service. A dedicated 10,000L firefighting water tank has been shown on Figures 3 and 4 and an implementation requirement has been included within Table 6 of this report. It is anticipated that the Local Government will require the implementation of this BMP as a condition of development approval which will allow the ongoing enforcement of the BMP under both the *Planning and Development*. Proposal can meet Acceptable Solution A4.2.

6. RESPONSIBILITIES FOR IMPLEMENTATION AND MANAGEMENT OF BUSHFIRE MEASURES

6.1 DEVELOPER/LANDOWNER RESPONSIBILITIES

NO.	IMPLEMENTATION ACTIONS	
1	Maintain all areas around the single house to the distances shown on Figures 4 and 5 of this Bushfire Management Plan in accordance with the standards outlined within Appendix B.2, Table 9: *Asset Protection Zone Technical Requirements* of the Guidelines.	Prior to application for building permit and thereafter maintained.
2	The driveway for the proposed dwelling is to be maintained in accordance with the requirements of Appendix B Table 10: *Vehicular Access Technical Requirements* of the Guidelines.	Ongoing.
3	A dedicated 10,000L firefighting water tank is to be installed and thereafter maintained in accordance with the requirements of this Bushfire Management Plan and Appendix B Table 11: *Water Supply Dedicated for Bushfire Firefighting Purposes* of the Guidelines.	Prior to occupancy and thereafter ongoing.

7. CERTIFICATION

I hereby certify that I have undertaken the assessment of the above site and determined the Bushfire Attack Level (s) stated in this document have been prepared in accordance with the requirements of AS3959:2018 and the Planning for Bushfire Guidelines.

SIGNED, ASSESSOR: .... DATE 16/6/2026

Jemma Douglas, Bushfire Logic

Accredited Level 2 Bushfire Practitioner (Accreditation No: 38400)

8. REFERENCES

AS3959-2018 Australian Standard, *Construction of buildings in bushfire-prone areas*, Building Code of Australia, Primary Referenced Standard, Australian Building Codes Board and Standards Australia.

Department of Fire and Emergency Services (DFES, 2023). Accessed at: DFES - Department of Fire and Emergency Services

Government of Western Australia (GoWA) (2015). *Planning and Development (Local Planning Scheme) Regulations 2015.*

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Government of Western Australia (GoWA) (1998). *Fire and Emergency Services Act 1998*.

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Office of Bushfire Risk management (OBRM) (2024). Map of Bushfire Prone Areas. Data retrieved from State Land Information Portal (SLIP) https://maps.slip.wa.gov.au/landgate/bushfireprone/

Western Australian Planning Commission (WAPC) (2024). *State Planning Policy 3.7: Bushfire*.

Western Australian Planning Commission (WAPC) (2024). *Planning for Bushfire.* Western Australian Planning Commission and Department of Planning, Lands and Heritage, Government of Western Australia.

APPENDIX 1: VEGETATION ASSESSMENT AND CLASSIFICATION

Site Details	
Address:	Lot 104 (No.181) Doghill Road
Suburb:	Baldivis
Local Government Area:	City of Rockingham
Description of works:	Single House

Report Details		
Report Version	**Assessment Date**	**Report Date**
1	December 2025 & June 2026	16 June 2026

Vegetation Classification

All vegetation within 150m of the site / proposed development was classified in accordance with Clause 2.2.3 of AS 3959-2018. Each distinguishable vegetation plot with the potential to determine the Bushfire Attack Level is identified below.

Vegetation Plot 1				
Classification	Class B Woodland			
Exclusion Clause (if applicable)	N/A			
Effective Slope	Measured	Upslope/Flat	Measured	All upslopes and flat land (0 degrees)
Description/Justification:	Plot 1 is characterised by eucalypt and peppermint tree woodland with a grass paddock understory. Foliage coverage is generally less than 30%.			
Post Development Assumptions:	Nil.			

Photo ID: **P1**

Photo ID: **P2**

Photo ID: **P3**

Vegetation Plot 2				
Classification	Class B Woodland			
Exclusion Clause (if applicable)	N/A			
Effective Slope	Measured	Downslope 3 degrees	Measured	Downslope >0-5 degrees
Description/Justification:	Plot 2 is characterised by eucalypt and peppermint tree woodland with a prominent grass understory. Foliage coverage is generally less than 30%.			
Post Development Assumptions:	Nil.			

Photo ID: **P4**

Photo ID: **P5**

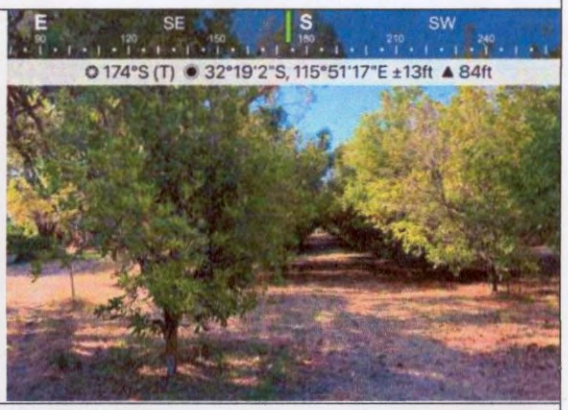
Vegetation Plot 3				
Classification	Class B Woodland			
Exclusion Clause (if applicable)	N/A			
Effective Slope	Measured	Downslope 6 degrees	Applied Range (Method 1)	Downslope >5-10 degrees
Description/Justification:	Plot 3 is characterised by isolated sections of eucalypt and peppermint tree woodland with a prominent grass understory. Foliage coverage is generally less than 30%.			
Post Development Assumptions:	Nil.			

Photo ID: **P6**

Photo ID: **P7**

Vegetation Plot 4				
Classification	N/A			
Exclusion Clause (if applicable)	2.2.3.2 (e) & (f) Non-vegetated areas and low threat vegetation – minimal fuel condition.			
Effective Slope	Measured	N/A	Applied Range (Method 1)	N/A
Description/Justification:	Plot 4 includes areas of low-threat vegetation maintained in perpetuity in accordance with the City's Firebreak Notice. The AS3959:2018 definition of low-threat vegetation includes orchards and the existing macadamia plantation has therefore been excluded. Plot 4 also includes areas permanently cleared of vegetation such as existing buildings, road reserves and driveways.			
Post Development Assumptions:	Nil.			

Photo ID: **P8**



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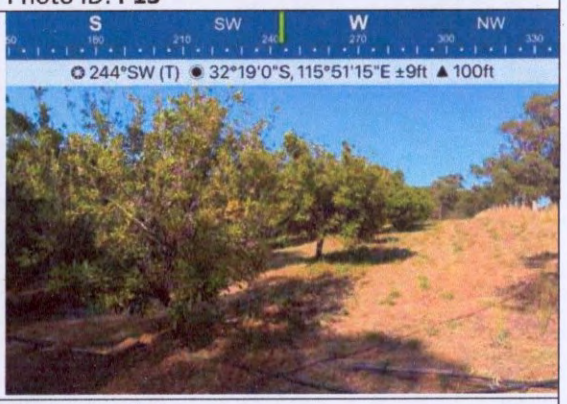

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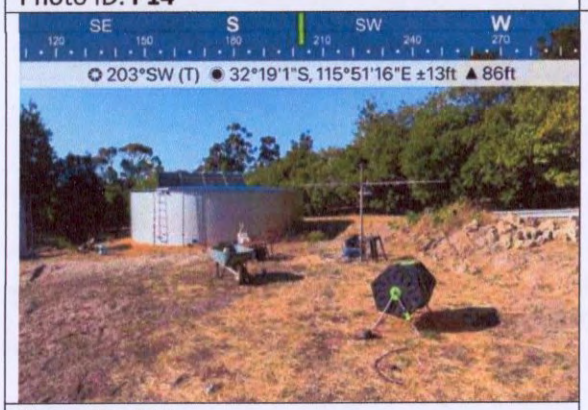

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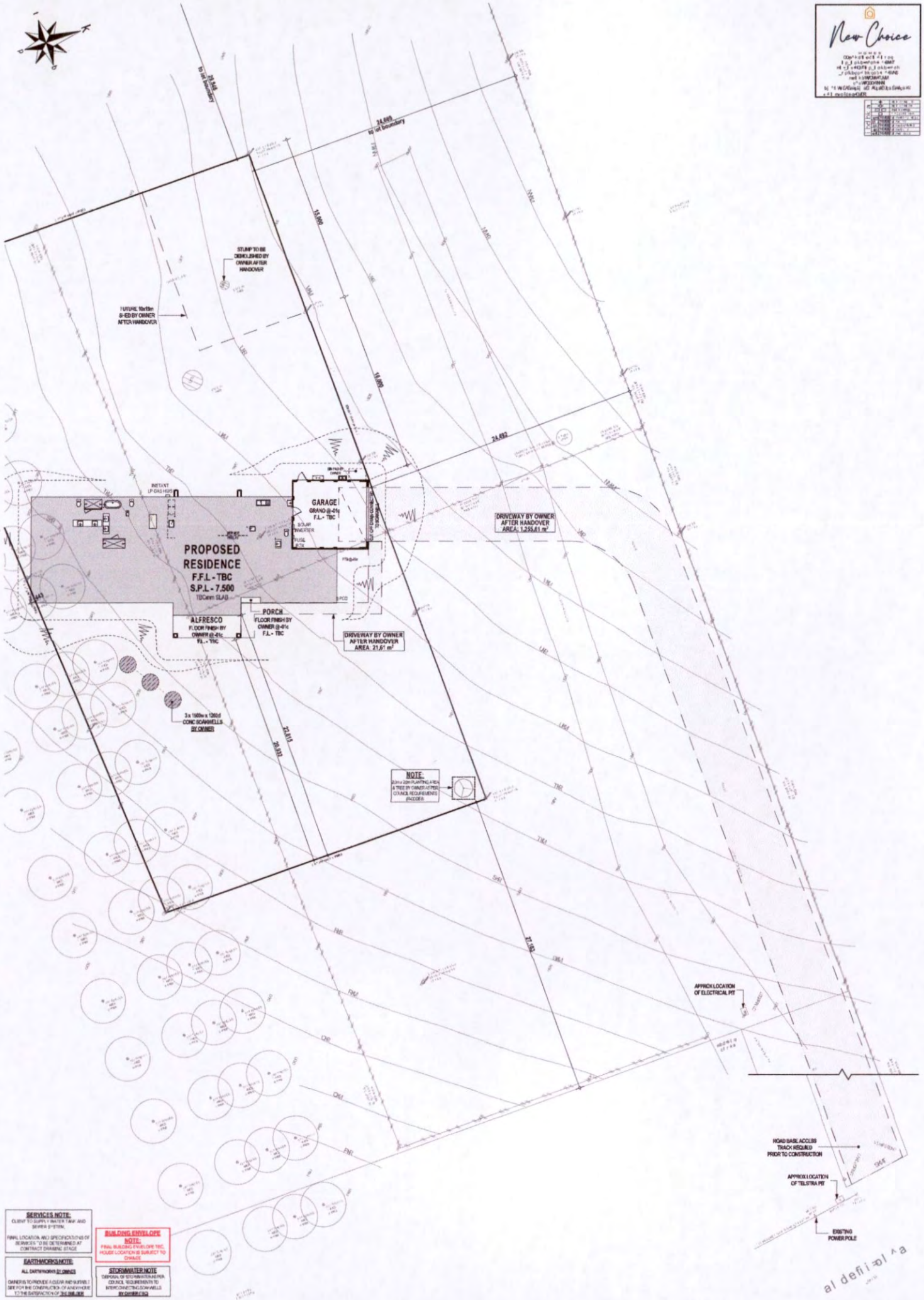
New Choice
STUMP TO BE DEMOLISHED BY OWNER AFTER HANDOVER
FUTURE 10x15m BY OWNER AFTER HANDOVER
INSTANT LP GAS HWC
GARAGE
GRAND @-0%
F.L.- TBC
PROPOSED RESIDENCE
F.F.L - TBC
S.P.L - 7.500
TBCmm SLAB
ALFRESCO
FLOOR FINISH BY OWNER @-0%
F.L. - TBC
PORCH
FLOOR FINISH BY OWNER @-0%
F.L. - TBC
DRIVEWAY BY OWNER AFTER HANDOVER AREA: 1,255.61 m²
DRIVEWAY BY OWNER AFTER HANDOVER AREA 21.61 m²
3 x 1500w x 1200d CONC SOAKWELLS BY OWNER
NOTE:
APPROX LOCATION OF ELECTRICAL PIT
ROAD BASE ACCESS TRACK REQUIRED PRIOR TO CONSTRUCTION
APPROX LOCATION OF TELSTRA PIT
EXISTING POWER POLE
SERVICES NOTE:
BUILDING ENVELOPE NOTE:
EARTHWORKS NOTE:
STORMWATER NOTE