

Bushfire management plan /statement addressing the bushfire protection criteria coversheet

Site address: Yarrimbah Heights (Lot 9001 Stock Rd & Lot 9002 Yarrimbah Dr, Bullsbrook)

Site visit: Yes ☒ No ☐

Date of site visit (if applicable): Day 20 Month July Year 2021

Report author or reviewer: Zac Cockerill

WA BPAD accreditation level (please circle):

Not accredited ☐ Level 1 BAL assessor ☐ Level 2 practitioner ☒ Level 3 practitioner ☐

If accredited please provide the following.

BPAD accreditation number: 37803 Accreditation expiry: Month August Year 2025

Bushfire management plan version number: 68709 Rev 0

Bushfire management plan date: Day 14 Month April Year 2025

If one or more of the following are selected, then these should be automatically referred to DFES

	YES	NO
Strategic planning is required to address SPP 3.7 and the Guidelines	☐	☒
The application is a vulnerable land use	☐	☒

None of the Above ☒

If one or more of the following are selected, and the decision-maker requires input from DFES, then the application can be referred.

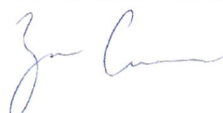
	YES	NO
The BAL rating has been calculated by a method other than Method 1 as prescribed by AS 3959	☐	☒
An outcomes-based approach has been submitted to demonstrate compliance with the bushfire protection criteria	☐	☒

None of the Above ☒

Note: If a subdivision or development application meets all the acceptable solutions and does not otherwise trigger a referral as listed above, seeking advice from DFES on SPP 3.7 or other matters is at the discretion of the decision-maker.

The information provided within this bushfire management plan to the best of my knowledge is true and correct:

Signature of report author or reviewer



Date 4/14/25

JBS&G 68709 | 166,751

68709 L01 Yarrimbah subdivision renewal BMP addendum (Rev 0)

14 April 2025

Matt Cousins
QUBE Property Group
Via email: Matt@qubeproperty.com.au

Yarrimbah Heights subdivision renewal: Bushfire Management Plan addendum

Dear Matt,

Strategen-JBS&G (now JBS&G) prepared a Bushfire Management Plan (BMP) in September 2021 to support proposed subdivision of the Yarrimbah Heights rural-residential development situated within Lot 301 Stock Road and Lot 302 Lage Road, Bullsbrook in the City of Swan. The subdivision was originally approved with conditions under WAPC Ref. 160314, issued on 5 October 2021, with revised conditions approved under WAPC reconsideration on 17 October 2022. Titles have been created for the first 18 lots within Stage 1, including construction of the near 4 km long rural link road between Lage Road and Clarkson Road. An additional 23 lots within Stages 2–4 are intended to be created under the current subdivision approval prior to expiry on 5 October 2025. However, subdivision renewal will be required for the remaining balance of development beyond Stage 4, which is not expected to be titled prior to expiry.

This letter has been prepared as an addendum to the original Strategen-JBS&G (2021) subdivision stage BMP to support proposed subdivision renewal for the balance undeveloped portion of Yarrimbah Heights (Lot 9001 Stock Road and Lot 9002 Yarrimbah Drive, Bullsbrook; hereon referred to as the project area). The proposed subdivision renewal comprises the following elements, as depicted in Figure 1:

- 132 proposed rural-residential lots
- proposed internal public road network
- balance Lot 9002, which includes Stages 2–4 (to be delivered under the current subdivision approval)
- exclusion of the 45 proposed lots within Lot 301 Stock Road to the south, which were previously approved under WAPC Ref. 160314
- exclusion of the 18 lots within Stage 1, which have already been titled.

Whilst some minor, justifiable subdivision design modifications are proposed, the subdivision renewal does not propose any significant changes to the lot and building envelope layout compared to that of the original subdivision approval under WAPC Ref. 160314.

Given the Area 2 bushfire prone status of the project area (see Plate 1), the proposed subdivision renewal is required to address Policy Measure 7.1 (General Measures) of 2024 *State Planning Policy 3.7 Bushfire* (SPP3.7) in accordance with 2024 *Planning for Bushfire Guidelines* (the Guidelines). This letter has been prepared to accompany proposed subdivision renewal for the project area and address bushfire planning requirements in accordance with SPP3.7 and the Guidelines. This letter provides the following information and should be read in conjunction with the original Strategen-JBS&G (2021) subdivision stage BMP and subsequent information provided to support WAPC reconsideration of conditions:

1. Reiteration of the bushfire assessments contained in the original Strategen-JBS&G (2021) subdivision stage BMP and subsequent information provided to support WAPC reconsideration of conditions (refer to separate bushfire information package) to avoid unnecessary repetition of information on the basis that:
 - a. proposed lot and building envelope layout has not significantly changed compared to that approved under WAPC Ref. 160314. Where minor changes have been proposed, these present similar or improved bushfire outcomes compared to those of the current subdivision approval (refer to Table 1 for a comparative bushfire analysis of the proposed subdivision renewal versus the existing subdivision approval)
 - b. aside from the improved bushfire outcomes resulting from Stages 1–4 clearing, earthworks and construction, on-ground site conditions have not materially changed from those assessed during the site inspections undertaken to support the original BMP/reconsideration information. On this basis, the BAL contour assessments undertaken to date (refer to separate bushfire information package) are still valid and provide an accurate representation of the post-development vegetation classifications, exclusions and effective slope within the project area and adjacent 150 m assessment area.
2. An outline of the key improvements in the bushfire risk profile for the project area proposed under the subdivision renewal, compared to those of the original subdivision approval.
3. Assessment against Bushfire Protection Criteria 5 of the Guidelines demonstrating bushfire compliance via acceptable solutions (Table 2).
4. A table of bushfire management actions and responsibilities for implementation specific to the proposed subdivision (Table 3) that can be appropriately conditioned as part of subdivision approval.

A significant package of bushfire information was prepared to support the original subdivision approval and reconsideration of conditions under WAPC Ref. 160314. This includes the following information, which is being reiterated as part of this BMP addendum as additional reference material and has been provided as a separate bushfire information package to support subdivision renewal:

- subdivision approval/reconsideration of conditions under WAPC Ref. 160314
- subdivision stage BMP (Strategen-JBS&G 2021)
- BAL contour reports for each proposed lot
- Two Level 3 bushfire practitioner peer review reports (Emerge Associates 2021 and Ecosystem Solutions 2022)
- slope analysis to justify provision and alignment of Fire Service Access Route/strategic firebreak
- indicative FSAR and strategic firebreak alignments.

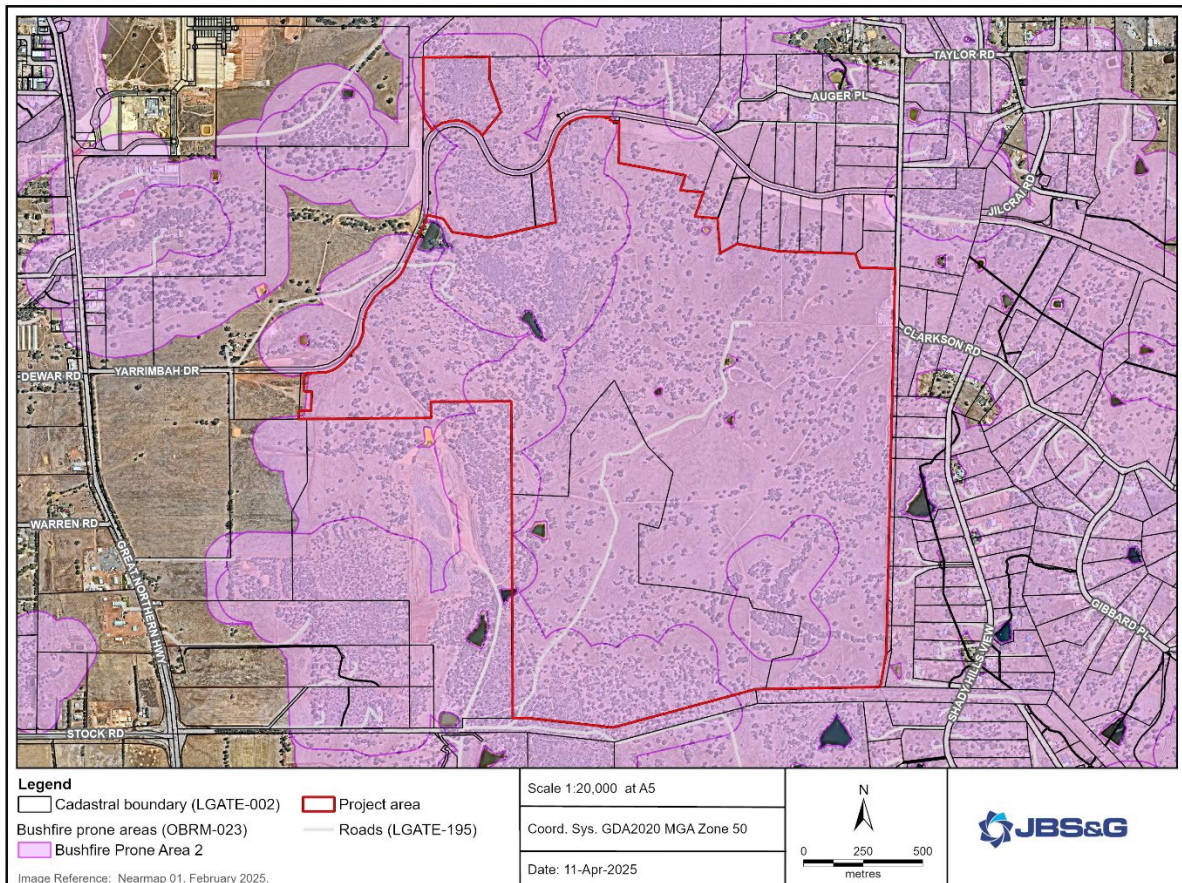


Plate 1: Designated bushfire prone status of the project area

Key improvements in bushfire risk profile

Key improvements have been made to the bushfire risk profile of the project area following completion of Stage 1 of the development and through proposed subdivision renewal, including:

1. Construction of the near 4 km long rural link road between Lage Road and Clarkson Road:
This significant financial investment from multiple stakeholders has resulted in the provision of two points of access for the project area, including Lage Road (and Great Northern Highway) to the west and Clarkson Road to the east. More importantly, this has delivered a significant community safety benefit for those existing residents east of the project area (e.g. in Shady Hills), who have been subject to a legacy non-compliant no-through road and risk of entrapment since establishment. This element was a key development commitment delivered as part of Stage 1 and significantly de-risks the bushfire risk profile for the locality and proposed subdivision renewal.
2. Exclusion of proposed development within Lot 301 Stock Road:
A total of 45 lots (approximately 20% of the original development proposal) were approved under WAPC Ref. 160314 within the Lot 301 Stock Road (southern) component of the original subdivision. This component of the subdivision directly abutted Walyunga National Park to the west and south and required careful design and mitigation to support approval, particularly with regards to the provision of strategic development setbacks, siting of building envelopes and perimeter fire access. This component of the development has been excluded from the proposed subdivision renewal, which removes a significant portion of the bushfire risk associated with the proposal. By not renewing these 45 lots, the project area no longer contains an interface with steep, forested areas of National Park. Instead, the project area will now be bound to the south by a public road interface (i.e. Stock Road) and adjacent Lot 301, which contains predominantly cleared grassland with isolated pockets of woodland. Removal of 20% of the original development proposal also significantly reduces the level of development intensification proposed in a designated bushfire prone area. This significantly de-risks the bushfire risk profile for the proposed subdivision renewal.
3. Relocation of Lot 16 boundary and building envelope
Lot 16 was arguably subject to the most bushfire risk of all the proposed lots approved under WAPC Ref. 160314, as evidenced by the 52 m wide APZ required to achieve BAL-29. This was due to being originally located on steep, forested areas of the scarp. The revised location of Lot 16 under the proposed subdivision renewal places the building envelope below the scarp, away from steep forested areas and results in a significant improvement in the local bushfire risk profile for this lot.
4. Proposed fire station:
Lot 8000, situated adjacent west of proposed Lot 1, has been created and ceded to the State of WA for the purposes of a future fire station, which was undertaken as part of WAPC Ref. 160314 during Stage 1 of development. Following construction, the proposed fire station will be available to service the locality and provide a direct bushfire emergency suppression response to Yarrimbah Heights. This was a commitment of the original planning approvals and will increase community resilience against bushfire risk for the locality.
5. Construction of Stages 1–4:
As previously stated, Stage 1 (18 lots) has been titled and sold, with construction of dwellings on individual lots now being progressed. Stages 2–4 (23 lots) are also intended to be delivered under the current subdivision approval prior to expiry. This will result in completion of approximately 25% of the modified development proposal (i.e. 41 lots of the total 173 lots now proposed). Delivery of 25% of the proposed development, much of which occurs on the more challenging portions of the site associated with the scarp sections in the northwest, will de-risk future stages of development by providing a greater level of land management than was otherwise in place over the vacant landholding prior to development. This will result in an improved bushfire risk profile for the project area and subdivision renewal.

Departures from existing subdivision approval

A comparative plan has been prepared to depict lot boundaries and building envelope locations of the existing subdivision approval under WAPC Ref. 160314 compared to the proposed subdivision renewal (Figure 2). Where changes have occurred that result in a modified bushfire impact, the lots in question have been included in Table 1, along with justification for the proposed departure from the approved subdivision and commentary in relation to the modified bushfire impact.

In summary, of the 132 lots proposed under the subdivision renewal, only 11 lots contain proposed changes to lot boundaries and/or building envelope locations that result in modified bushfire impacts compared to those previously assessed. As a result of these changes, nine of the 11 lots will achieve improved bushfire outcomes, whilst two will result in no material change to the bushfire outcome.

Table 1: Comparative bushfire analysis

Lot No.	Change to lot boundary/building envelope	Justification and bushfire impact
9	Adjusted lot boundary and building envelope location in response to on-site dam location/ subdivision condition	Required to address condition of WAPC reconsideration (A 1f) to avoid the water body straddling proposed Lots 9 and 10. The new building envelope location will require a BAL and APZ response to Class D scrub and Class B woodland vegetation instead of the Class A forest and Class G grassland vegetation assessed under the original building envelope location and BAL assessment, so the resulting bushfire impact will not materially change.
14	Adjusted lot boundary and building envelope location to cater for Lot 16 modifications and in response to subdivision condition	Required to enable revised location of Lot 16 directly south and to address condition of WAPC reconsideration (D11) to locate the building envelope as close as possible to the street boundary. The slight shift in building envelope to the west will provide additional separation to the adjacent east forest vegetation, resulting in a marginally improved bushfire outcome.
16	Adjusted lot boundary and building envelope location in response to site constraints	Required to relocate building envelope and driveway below the scarp away from steep forested terrain. The relocated building envelope achieves a favourable engineering and bushfire outcome by avoiding siting of development on steep forested terrain, which would have required a substantial APZ (up to 52 m wide) to achieve BAL-29 for the proposed dwelling. With the new building envelope sited below the steep forested areas of the scarp, the future dwelling will achieve BAL-29 or lower with a significantly reduced APZ (21 m wide). The reduced APZ will result in a significant reduction in vegetation modification/ongoing maintenance burden for the future landowner. In addition, steep driveway requirements will be avoided for the new building envelope location, with street frontage occurring below the scarp on a relatively flat grade, instead of the significant grade to Yarrimbah Drive partway up the scarp. The bushfire risk profile for the relocated lot and building envelope is significantly reduced compared to its originally approved location under WAPC Ref. 160314.
56	Adjusted building envelope location in response to subdivision condition	Required to address condition of WAPC reconsideration (D11) to locate the building envelope as close as possible to the street boundary. The slight shift in building envelope to the east will provide additional separation to the adjacent west forest and scrub vegetation, resulting in a marginally improved bushfire outcome.
57	Adjusted building envelope location in response to subdivision condition	Required to address condition of WAPC reconsideration (D11) to locate the building envelope as close as possible to the street boundary. The slight shift in building envelope to the east will provide additional separation to the adjacent west forest and shrubland vegetation, resulting in a marginally improved bushfire outcome.

Lot No.	Change to lot boundary/building envelope	Justification and bushfire impact
59	Adjusted building envelope location in response to subdivision condition	Required to address condition of WAPC reconsideration (D11) to locate the building envelope as close as possible to the street boundary. The slight shift in building envelope to the east will provide additional separation to the adjacent west forest and shrubland vegetation, resulting in a marginally improved bushfire outcome.
61	Adjusted building envelope location in response to subdivision condition	Required to address condition of WAPC reconsideration (D11) to locate the building envelope as close as possible to the street boundary. The slight shift in building envelope to the east will provide additional separation to the adjacent west forest vegetation, resulting in a marginally improved bushfire outcome.
63	Adjusted building envelope location in response to subdivision condition	Required to address condition of WAPC reconsideration (D11) to locate the building envelope as close as possible to the street boundary. The slight shift in building envelope to the east will provide additional separation to the adjacent west forest vegetation, resulting in a marginally improved bushfire outcome.
65	Adjusted building envelope location in response to subdivision condition	Required to address condition of WAPC reconsideration (D11) to locate the building envelope as close as possible to the street boundary. The slight shift in building envelope to the east will provide additional separation to the adjacent west forest and grassland vegetation, resulting in a marginally improved bushfire outcome.
117	Adjusted building envelope location in response to revised quarry buffer	Required to deliver a building envelope outside of the revised quarry buffer. This will result in no material change to the bushfire outcome.
120	Adjusted building envelope location in response to revised quarry buffer	Required to deliver a building envelope outside of the revised quarry buffer. The slight shift in building envelope to the east will provide additional separation to the adjacent west woodland vegetation, resulting in a marginally improved bushfire outcome.

Compliance with Element 1: Location of SPP3.7 (2024)

Element 1 Location was previously assessed and approved for the project area under SPP3.7 (2015) and accompanying Guidelines (2017) as part of the Strategen-JBS&G (2021) subdivision stage BMP. On this basis, the location of the project in relation to the surrounding bushfire risk context has already been accepted and approved as part of previous planning stages, as evidenced by delivery of the rural link road, creation of title for Stage 1 lots and intended creation of title for Stages 2–4 under the current subdivision approval (WAPC Ref. 160314). Therefore, demonstration of compliance with the new Broader Landscape Assessment methodology for Element 1: Location is not required for this subdivision renewal process as per provisions under Section 1.3.1 of the Guidelines, which states:

*Where a strategic planning proposal, subdivision or development application was assessed against SPP 3.7 (2015) and the Guidelines, the subsequent stage(s) of the planning process, or modification or addition to the development approval, should demonstrate compliance with SPP 3.7 (2024) and these Guidelines, **with the exception of the new methodology for Element 1: Location (if required).***

BAL contour assessments

BAL contour assessments were undertaken for all proposed lots approved under WAPC Ref. 160314 as part of the subdivision stage BMP (Strategen-JBS&G 2021) and subsequent information provided to support WAPC reconsideration of conditions. This covers all 132 lots of the proposed subdivision renewal.

A separate bushfire information package has been provided that includes these assessments to avoid unnecessary repetition of information on the basis that:

1. Proposed lot and building envelope layout has not significantly changed compared to that approved under WAPC Ref. 160314. Where minor changes have been proposed, these present either similar or improved BAL and APZ outcomes compared to those of the current subdivision approval (refer to Table 1 for a comparative bushfire analysis of the proposed subdivision renewal versus the existing subdivision approval).
2. Aside from the improved bushfire outcomes resulting from Stages 1–4 clearing, earthworks and construction, on-ground site conditions have not materially changed from those assessed during the site inspections undertaken to support the original BMP/reconsideration information. On this basis, the BAL contour assessments undertaken to date (refer to separate bushfire information package) are still valid and provide an accurate representation of the post-development vegetation classifications, exclusions and effective slope within the project area and adjacent 150 m assessment area.

Level 3 peer reviews

Level 3 bushfire practitioners Anothony Rowe (BPAD36690) and Gary McMahon (BPAD35078) completed peer reviews of the original subdivision stage BMP and reconsideration information. The resulting reports (Emerge Associates 2021 and Ecosystem Solutions 2022 respectively) and recommendations contained within have been provided in the separate bushfire information package. Both Level 3 peer reviews supported subdivision approval and the relevant recommendations/actions were conditioned to be implemented as part of staged subdivision clearances. These recommendations/actions have been reiterated for implementation in Table 3.

Detailed Bushfire Design Guides

Individual lot Detailed Bushfire Design Guides have been prepared to date for Stages 1 and 2 as part of the site's subdivision clearance requirements (i.e. prior to lot title) to assist future landowners in mitigating bushfire risk to people, property and the environment. The guides capture bushfire management requirements specific to each lot and are to be implemented by the future landowner to comply with legal bushfire management obligations in accordance with the approved subdivision stage Bushfire Management Plan (BMP) and City of Swan Fire Hazard Reduction Notice. The guides include:

- results of a Bushfire Attack Level (BAL) contour assessment to demonstrate the indicative BAL impacts across the lot to inform future Development Application (DA) and building stage requirements
- indicative Asset Protection Zone (APZ) location to inform future DA stage and building requirements
- bushfire management obligations of the City of Swan Fire Hazard Reduction Notice specific to the lot, including firebreak and fuel management requirements
- requirements for private driveways
- requirements for fire-fighting water supply
- general bushfire safety information.

It is intended that the preparation of Detailed Bushfire Design Guides will be continued for all proposed lots within the project area, as stated in Table 3.

Assessment against Bushfire Protection Criteria 5

Compliance with Elements 1–4 of Bushfire Protection Criteria 5 of the Guidelines (relevant to Structure Plans and subdivision applications) is demonstrated by meeting the acceptable solutions, as detailed in Table 2.

Table 2 Compliance with BPC 5: Structure Plans and subdivision applications

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
Element 1: Location				
O1 – Avoid broader landscapes that present an unacceptable bushfire risk to life, property and infrastructure.	A1.1a Broader Landscape Type A The subject site is located in an area that is a Broader Landscape Type A. This location satisfies the policy outcome for Element 1: Location and no additional consideration is required.	N/A	Not applicable to this subdivision application. According to Section 1.3.1 of the Guidelines, demonstration of compliance with the new Broader Landscape Assessment methodology for Element 1 Location is not required as the project area has already been previously assessed and approved under SPP 3.7 (2015) and the Guidelines (2017) as part of the Strategen-JBS&G (2021) subdivision stage BMP, as approved under WAPC Ref. 160314. For this reason, compliance with Element 1 Location has been previously demonstrated and accepted for the project area, consistent with provisions of Section 1.3.1 of the Guidelines.	N/A
	A1.1b Broader Landscape Type B The subject site is located in an area that is a Broader Landscape Type B which presents an unacceptable bushfire risk of a landscape-scale bushfire resulting in impacts to people, property and infrastructure. This location does not satisfy the acceptable solution for Element 1: Location. Where the practitioner considers that further analysis could demonstrate to the decision-maker that the risks can be appropriately managed, and/or mitigated,	N/A	Not applicable to this subdivision application. Refer to justification provided above.	N/A

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
	an outcomes-based approach should be prepared, in accordance with policy measure 7.5 of SPP 3.7. Further explanatory notes are provided in Appendix B.1 of the Guidelines.			
Element 2: Siting and design				
O2 – Ensure siting and design solutions: - manage or mitigate the bushfire risk to people, property and infrastructure; and - avoid, or where unavoidable, minimises the clearing of native vegetation.	A2.1 Siting and design Ensure that each proposed and existing lot(s) contains a sufficient development site(s) that can achieve a radiant heat impact not exceeding 29 kW/m ² (BAL-29).	Acceptable solution	The individual lot BAL contour assessments undertaken as part of the subdivision stage BMP (Strategen-JBS&G 2021) and subsequent information provided to support WAPC reconsideration of conditions (refer to separate bushfire information package) indicates that all future habitable development within each proposed lot can be sited within areas of BAL-29 or lower subject to establishment of the nominated APZs.	✓
	A2.2 Asset Protection Zone (APZ) Where a development site cannot be wholly located within an area with a radiant heat impact not exceeding 29 kW/m ² (BAL-29) in its pre-development state, an indicative APZ is to be provided and meet the following requirements: Width – the APZ is to be measured from the development site, and of sufficient size to ensure the radiant heat impact of a bushfire does not exceed 29 kW/m² (BAL-29) in all circumstances.	Acceptable solution	The individual lot BAL contour assessments undertaken as part of the subdivision stage BMP (Strategen-JBS&G 2021) and subsequent information provided to support WAPC reconsideration of conditions (refer to separate bushfire information package) defines minimum 20 m wide APZs for all proposed lots sufficient to achieve BAL-29 or lower for all habitable development, with all proposed APZs to be contained within lot	✓

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
	- Location – the APZ is to be contained solely within the boundaries of the lot, except in instances where: - the vegetation on the adjoining lot(s) is, and will continue to be, low threat as per Clause 2.2.3.2 of AS 3959 or the requirements of Appendix B.2, Table 9 – APZ technical requirements, or an alternative standard in a local planning scheme, on an ongoing basis in perpetuity as agreed upon via a substantiated management agreement between the applicable landowners and the local government; or - the adjoining land is, and will remain in perpetuity, non-vegetated such as a sealed or unsealed road, or a water body. - Management – the APZ is managed in accordance with the requirements of Appendix B.2, Table 9 – APZ technical requirements, or an alternative standard in a gazetted local planning scheme.		boundaries (including lot boundary firebreaks of adjacent lots if needed). All land proposed to be modified to a non-vegetated/low threat managed state as part of proposed development (i.e. building envelopes, APZs if required, roads, firebreaks, FSARs, firebreak notice provisions, etc) is to be established and maintained in accordance with APZ technical requirements outlined in Appendix B2 of the Guidelines.	
	A2.3 Clearing of native vegetation The structure plan or subdivision avoids, or where unavoidable, minimises the clearing of native vegetation.	Acceptable solution	Environmental approvals have been sought for the proposed development through standard state and federal processes. Siting of building envelopes, APZs and firebreaks has occurred within cleared areas of the site to minimise clearing where possible.	✓

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
Element 3: Vehicular access				
O3 – Ensure the design and capacity of vehicular access and egress provide: - for efficient and effective evacuation to a suitable destination(s) and/or - as a contingency measure for vulnerable land uses, an on-site shelter, where demonstrated appropriate, as a last resort option.	A3.1 Public roads Public roads are to meet the technical requirements in Appendix B.3, Table 10.	Acceptable solution	All public roads will be constructed to the relevant technical requirements of the Guidelines.	✓
	A3.2 Access routes Area 1 (Urban): Public road access is to be provided to at least one suitable destination. Area 2: Public road access should be provided in two different directions to two different suitable destinations, with an all-weather surface.	Acceptable solution	A combination of the existing surrounding road network and the proposed internal vehicle access network will provide all occupants with the option of travelling to at least two different suitable destinations as follows: - connection to Yarrimbah Drive, Lage Road and Great Northern Highway to the west, which provides access north to urban areas of Bullsbrook and south to urban areas of Ellenbrook, The Vines and Upper Swan - connection to Yarrimbah Drive and Clarkson Road to the east, which provides access north and west to urban areas of Bullsbrook.	✓
	A3.3a No-through roads Area 1: No limitation on no-through road lengths. Area 2: If the public road access to the subject site is via a no-through road which cannot be avoided due to demonstrated site constraints, the public road access is	Acceptable solution	No permanent no-through roads are proposed. Two temporary compliant no-through roads are proposed to deliver future connections to the north onto adjacent land. Additional, temporary compliant no-through	✓

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
	to be a maximum of 200 metres from the proposed lot(s) boundary to an intersection where two-way access is provided. The no-through road may exceed 200 metres if it is demonstrated that an alternative access, including an emergency access way, cannot be provided due to site constraints and the following requirements are met: - the no-through road travels towards a suitable destination; and - the balance of the no-through road that is greater than 200 metres from the subject site is wholly within BAL-LOW, or is within a residential built-out area, or is within Area 1 (Figure 29).		roads may also be required as part of internal development staging (see A3.3b).	
	A3.3b No-through road requirements A no-through road is to meet all the following requirements: - requirements of a public road (Appendix B.3, Table 10, Column 2); and - turn-around area/head (Figure 30).	Acceptable solution	Any temporary no-through roads required as part of development staging will be constructed to the relevant technical requirements of the Guidelines.	✓
	A3.4 Emergency access way <i>Where it is demonstrated that A3.2 and A3.3 cannot be achieved due to site constraints or where an alternative design option does not exist, an emergency access way can be considered as an acceptable solution.</i>	Acceptable solution	No permanent EAWs will be required as part of proposed development. If temporary EAWs are required as part of internal development staging, they will be constructed to the relevant technical requirements of the Guidelines.	✓

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
	An emergency access way is to meet the following requirements: - the requirements of Appendix B.3, Table 10, Column 3; - provides a through connection to a public road; - is no more than 500 metres in length; - connects to a public road network (note: an emergency access way onto the State Road Network requires access approval from Main Roads WA); - the proponent obtaining consent from the local government, that it will accept care, control and management for the access way; and - is signposted and, if gated, gates must open for the whole carriageway width and remain unlocked.			
	A3.5a Perimeter roads A perimeter road is a public road and is to be provided for greenfield or infill development where 10 or more lots are proposed (including as part of a staged subdivision) with the aim of: - separating areas of permanent classified vegetation under AS 3959 which adjoin the subject site, from the proposed lot(s); and - removing the need for battle-axe lots that back onto areas of classified vegetation.	Acceptable solution	Perimeter public roads have been provided where possible for the project area, namely along the northwest interface (Yarrimbah Drive), the southern interface (Stock Road) and a portion of the eastern interface (Clarkson Road). Perimeter public roads have not been provided at the following interfaces: <u>interface with proposed Lot 9</u>: due to topographical site constraints, as demonstrated through supplementary information provided to support WAPC	✓

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
	A perimeter road is to meet the requirements contained in Appendix B.3, Table 10, Column 1. A perimeter road may not be required where: - the adjoining classified vegetation is Class G Grassland; - lots are zoned for rural living or equivalent; - it is demonstrated that it cannot be provided due to site constraints; or - all lots have frontage to an existing public road.		reconsideration of conditions (refer to separate bushfire information package), a 6 m wide strategic firebreak was deemed sufficient along the interface with Lot 9 to provide perimeter fire access closer to the building envelopes for Lots 55–57, 59, 61, 63, 65, 67, 69, 71 and 73–76, as required to address condition of WAPC reconsideration (D13) and depicted on Figure 1. <u>Interface with Lot 202 clay quarry</u>: due to topographical site constraints, as demonstrated through supplementary information provided to support WAPC reconsideration of conditions (refer to separate bushfire information package), a 6 m wide Fire Service Access route (FSAR) was deemed sufficient along this interface to provide perimeter fire access for Lots 117–125, as required to address condition of WAPC reconsideration (B31) and depicted on Figure 1. The FSAR will be widened to 10 m in accordance with current 2024 Guideline technical requirements. <u>Interface with existing rural-residential lots to the southeast and rural lots to the north</u>: it is noted that the predominant	

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
			interfacing vegetation is grassland, the lots are zoned for rural living (or equivalent) and topographical site constraints, as demonstrated through supplementary information provided to support WAPC reconsideration of conditions (refer to separate bushfire information package) prohibit the provision of perimeter public roads along these interfaces, consistent with provisions of acceptable solution A3.5a.	
	A3.5b Fire service access route <i>Where proposed lots adjoin classified vegetation under AS 3959 (excluding Class G Grassland), and a perimeter road is not required in accordance with A3.5a, a fire service access route is to be provided to provide firefighter access, where access is not available to the classified vegetation.</i> A fire service access route is to meet the following requirements: • requirements of Appendix B.3, Table 10, Column 4; • be through-routes with no dead-ends; • must be signposted; • no further than 500 metres from a public road;	Acceptable solution	As previously stated, an FSAR is proposed along the interface with the Lot 202 clay quarry to provide perimeter fire access for Lots 117–125 due to topographical site constraints, as demonstrated through supplementary information provided to support WAPC reconsideration of conditions (refer to separate bushfire information package) and as previously required to address condition of WAPC reconsideration (B31), as depicted in Figure 1. The FSAR was originally proposed to be 6 m wide in accordance with technical requirements under the 2017 Guidelines; however, the FSAR will be widened under the subdivision renewal to 10 m in accordance with current 2024 Guideline technical requirements.	✓

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
	- the proponent obtaining consent from the local government that it will accept care, control and management; and - if gated, gates must open the whole carriageway width and can be locked by the local government and/or the emergency services, if keys are provided for each gate.			
	A3.6 Battle-axe access legs <i>Where it is demonstrated that a battle-axe access leg cannot be avoided due to site or design constraints, it can be considered as an acceptable solution.</i> There are no battle-axe technical requirements where the point of the battle-axe access leg joins the effective area of the battle-axe lot, is less than 50 metres from a public road in a reticulated water area. In circumstances where the above acceptable solution is not met, or the battle-axe lot is in a non-reticulated water area, the battle-axe leg is to meet the following requirements: - requirements in Appendix B.3, Table 10, Column 5; - passing bays every 200 metres with a minimum length of 20 metres and a minimum additional carriageway width of two metres (i.e. the combined carriageway width of the passing bay and constructed private driveway to be a minimum six metres); and	N/A	Not applicable. No battle-axes are proposed as part of the subdivision and the project area is not serviced by an existing battle-axe.	N/A

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
	turn-around area/head (Figure 30).			
Element 4: Water supply				
4 – Ensure that sufficient water is available and accessible for emergency services, to enable people, property and infrastructure to be defended from bushfire.	A4.1 Water supply for structure plans Evidence that a reticulated or sufficient and sustainable non-reticulated water supply for bushfire firefighting can be provided at the subdivision and/or development application stage, in accordance with the specifications of the relevant water supply authority or the requirements in Appendix B.4: Water Supply dedicated for bushfire firefighting. Where the provision of a strategic water tank(s) is required, a suitable area should be identified as a Crown reserve on the structure plan, to the satisfaction of the WAPC on advice from the local government.	N/A	Not applicable to the subdivision planning stage.	N/A
	A4.2 Water supply for subdivision applications Where a reticulated water supply is existing or proposed, a hydrant connection(s) should be provided in accordance with the specifications of the relevant water supply authority. Where these specifications cannot be met, then the following applies: the provision of a water tank(s) in accordance with the requirements of Appendix B.4, Table 11 – Water supply dedicated for bushfire firefighting; and	Acceptable solution	One 100 kL water tank has been constructed in accordance with relevant bushfire technical requirements and City of Swan standards as part of Stage 1 of the development within the Yarrimbah Drive road reserve (see Figure 1). An additional three 100 kL water tanks are proposed to be constructed and located as depicted in the plan of subdivision to fulfill the water supply requirements of the Guidelines (i.e. 50 kL per 25 lots). Water tanks will be constructed in accordance with Guideline	✓

Outcomes	Acceptable solutions	Method of compliance	Statement of development compliance	Compliance achieved
	Where the provision of a strategic water tank(s) is applicable, then the following requirements apply: - land to be ceded free of cost to the Crown for the placement of the tank(s); - the proposed reserve where the tank is to be located is identified on the plan of subdivision; - tank capacity, construction and fittings, provided in accordance with the requirements of Appendix B.4; and - a strategic water tank is to be located no more than a 10-minute drive from the furthest development site (at legal road speeds).		technical requirements of Appendix B4, Table 11 of the Guidelines.	
	A4.3 Water supply for existing habitable building(s) Where subdivision includes an existing habitable building(s) that is to be retained, a hydrant connection(s) should 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 B.4, Table 5 – Water supply dedicated for bushfire firefighting.	N/A	Not applicable to this application. There are no existing habitable buildings that will be retained within the project area.	N/A

Responsibilities for implementation and management of the bushfire measures

Implementation of this BMP addendum applies to the developer and prospective landowners to ensure bushfire management measures are adopted and implemented on an ongoing basis. A bushfire responsibilities table is provided in Table 3 to drive implementation of all bushfire management works associated with this BMP addendum, with the developer commitments prior to issue of title to be conditioned as part of subdivision approval.

Table 3: Responsibilities for implementation and management of the bushfire measures

Implementation/management table	
No.	Implementation action
1 - Developer – prior to issue of titles	
1-1	Construct (or have works bonded) the public roads to the standards stated in this BMP addendum, including any temporary staged access requirements (e.g. temporary compliant no-through roads/EAWs).
1-2	Construct the FSARs at the relevant stages of development to the standards stated in this BMP addendum.
1-3	Construct (or have works bonded) the three remaining 100 kL water tanks at the relevant stages of development to the standards and locations specified in this BMP addendum.
1-4	Establish all non-vegetated and low threat managed areas (i.e. proposed building envelopes, APZs if required, roads, firebreaks, FSARs, firebreak notice provisions, etc) to the standards stated in this BMP addendum.
1-5	Undertake individual lot BAL contour assessment based on final detailed lot and building envelope design.
1-6	Prepare individual lot Detailed Bushfire Design Guides to inform future landowners of their individual lot bushfire management requirements to comply with their legal bushfire management obligations.
1-7	Add a restrictive covenant on the title for all proposed lots stating the following: • NOT TO allow vegetation and bushfire fuel loads to exceed Asset Protection Zone standards throughout the designated Asset Protection Zone, as per the Detailed Bushfire Design Guide • NOT TO allow vegetation and bushfire fuel loads to exceed requirements of the City of Swan annual firebreak notice for land outside of the designated Asset Protection Zone, as per the Detailed Bushfire Design Guide • NOT TO allow less than a 10 kilolitre reserve of water dedicated for firefighting purposes within domestic water supply tanks, to be provided within 3 metres of the driveway on the Lot, signposted and couplings to the City of Swan's specifications, as per the Detailed Bushfire Design Guide • NOT TO be non-compliant with all other provisions of the Detailed Bushfire Design Guide • NOT TO construct habitable buildings in areas subject to BAL-40 and BAL-Flame Zone.
1-8	Comply with relevant provisions of the City of Swan annual firebreak notice, as amended.
1-9	Comply with the recommended actions outlined in the Section 6 summary table of the Ecosystem Solutions (2022) Level 3 Peer Review.
1-10	Comply with the relevant review comments outlined in Table 2 of the Emerge (2021) Level 3 Peer Review.

Implementation/management table	
No.	Implementation action
1-11	Undertake a BMP compliance assessment on a staged basis to demonstrate that all relevant requirements of this BMP addendum have been implemented throughout the duration of subdivisional works.
2 - Developer – until sale/transfer of lots	
2-1	Maintain the public roads to the standards stated in this BMP addendum, including any temporary staged access requirements (e.g. temporary compliant no-through roads/EAWs).
2-2	Maintain the FSARs for the relevant stages of development to the standards stated in this BMP addendum.
2-3	Maintain the three remaining 100 kL water tanks to the standards and locations specified in this BMP addendum.
2-4	Maintain all non-vegetated and low threat managed areas (i.e. proposed building envelopes, APZs if required, roads, firebreaks, FSARs, firebreak notice provisions, etc) to the standards stated in this BMP addendum.
2-5	Comply with relevant provisions of the City of Swan annual firebreak notice, as amended.
3 - Landowner/occupier – prior to building construction and ongoing	
3-1	Establish/maintain vacant building envelopes and APZs in a low threat state to achieve exclusion Clause 2.2.3.2 (f) of AS3959, including slashing/mowing of grassland and weeds to height of less than 100 mm, until developed to a permanent low fuel state.
3-2	Adopt bushfire construction standards relevant to the final assessed BAL rating.
3-3	Comply with requirements outlined in the Detailed Bushfire Design Guides.
3-4	Comply with relevant provisions of the City of Swan annual firebreak notice, as amended.

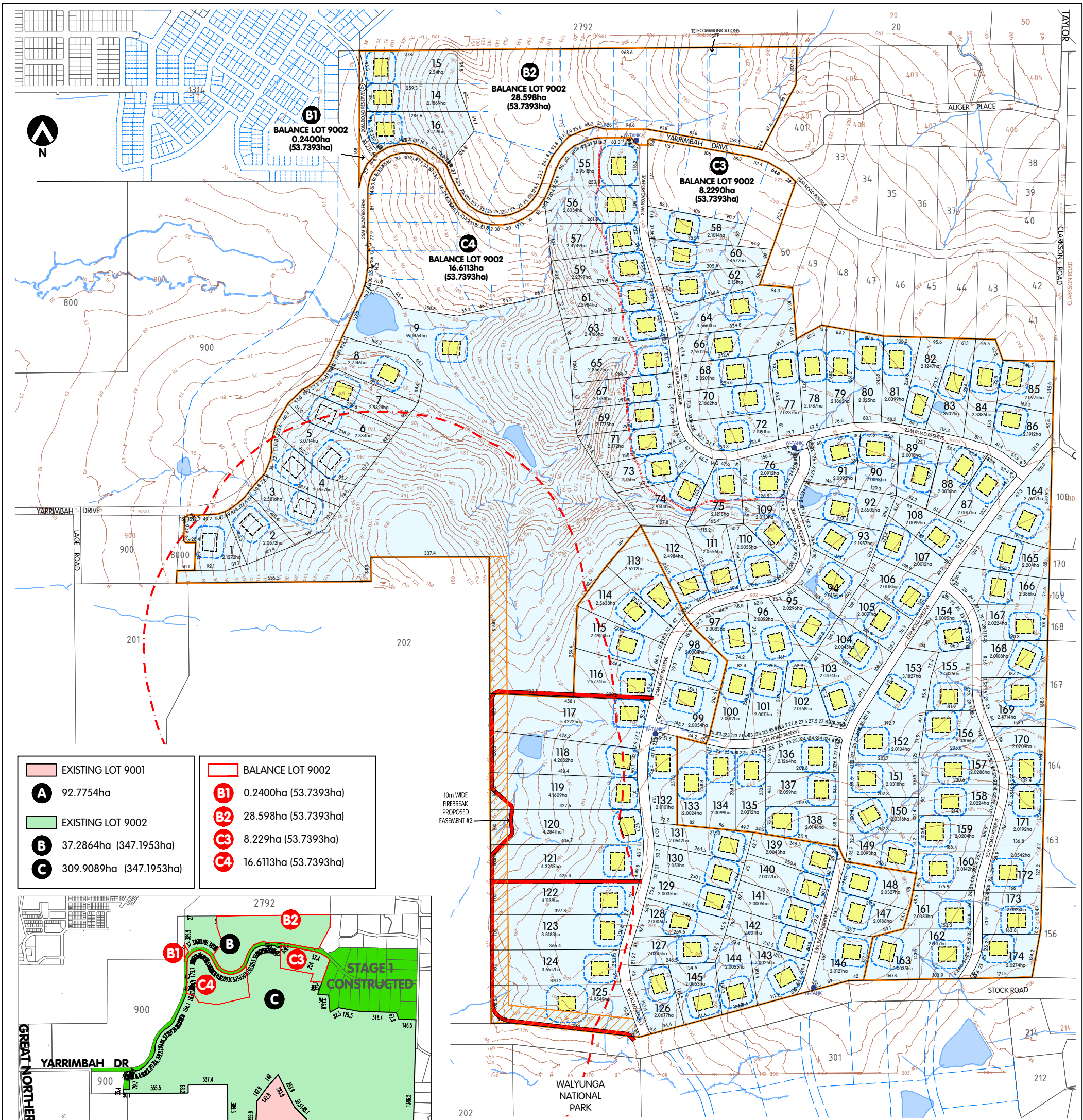
Should you require clarification, please contact the undersigned on 0400784860 or by email at zcockerill@jbsg.com.au.

Yours sincerely:

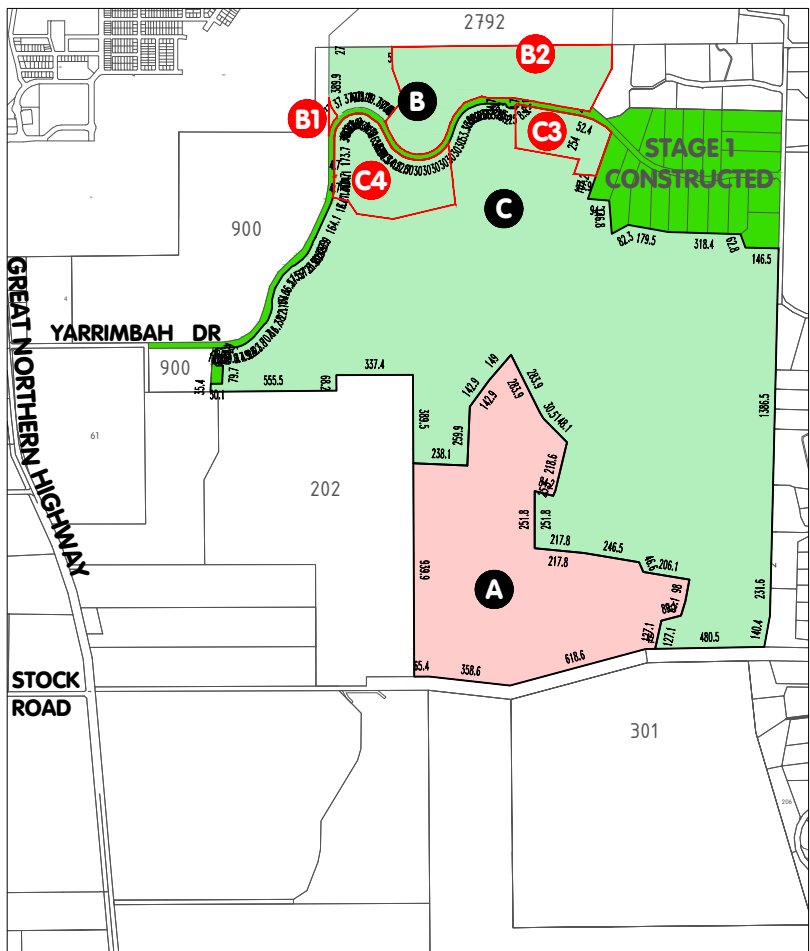
A handwritten signature in purple ink, appearing to read "Zac Cockerill".

Zac Cockerill
Senior Associate & Level 2 bushfire practitioner
(BPAD 37803)
JBS&G Australia Pty Ltd





EXISTING LOT 9001	BALANCE LOT 9002
A 92.7754ha	B1 0.2400ha (53.7393ha)
EXISTING LOT 9002	B2 28.598ha (53.7393ha)
B 37.2864ha (347.1953ha)	C3 8.229ha (53.7393ha)
C 309.9089ha (347.1953ha)	C4 16.6113ha (53.7393ha)



LOCATION PLAN - EXISTING LOTS

PROPOSED LAND USE/DEVELOPMENT			YIELD	
Zone	Lot Size	No. of Lots	Existing Lot	
Rural Residential	2HA - 5HA	130	Existing Lot	2
Rural Residential	5HA - 10HA	1	Proposed Lots	
Rural Residential	OVER 25HA	1	Balance Lot	1
Other [balance lot]	OVER 25HA	1	Rural Residential Lots	132
	TOTAL	133	Total	133

LEGEND

- EXISTING LOT BOUNDARY
- EXISTING LOT BOUNDARIES
- INDICATIVE BUILDING ENVELOPE
- INDICATIVE BUILDING PAD - APZ
- 199 PROPOSED LOT NUMBER
- PROPOSED SUBDIVISION AREA
- STRATEGIC DEVELOPMENT SETBACK PER BUSHFIRE MANAGEMENT PLAN (50m)
- EXISTING CONTOURS
- BUFFER TO CLAY QUARRY PER 2024 APPROVAL
- INDICATIVE 10m WIDE FIRE SERVICE ACCESS ROUTE (EASEMENT #2) - [maintenance responsibility of land owner]
- STRATEGIC FIREBREAKS - [maintenance responsibility of land owner]
- W-TANK INDICATIVE WATER TANK LOCATION
- TEMPORARY CULS-DE-SAC (per civil engineering requirements)

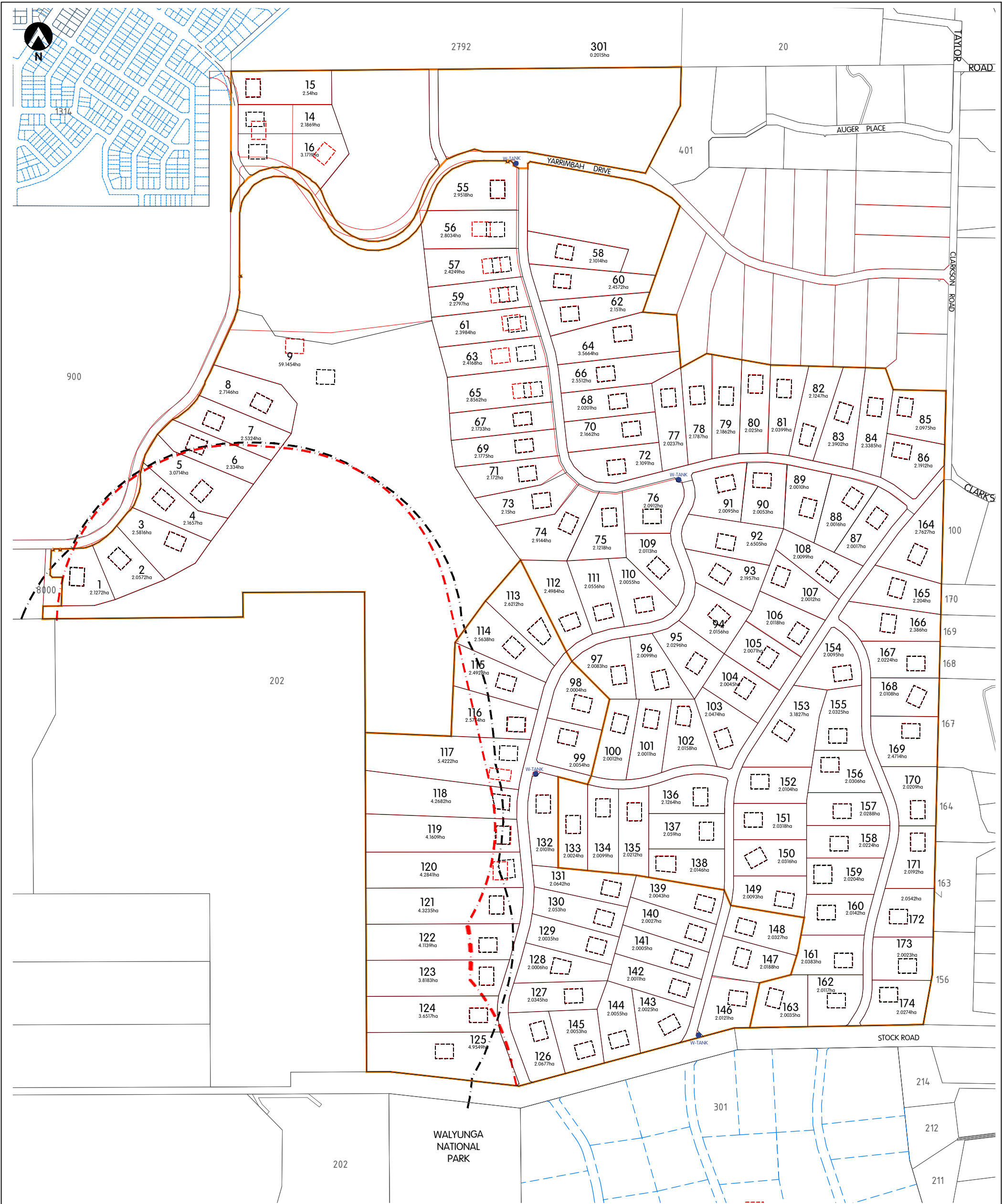
CADASTRAL INFORMATION
SOURCE: MNG
YYMMDD: -250224
DWG REF: -
105441lots-9999s-MGA94z50
PROJECTION: - MGA94z50

HATCH
AERIAL PHOTOGRAPHY
SOURCE: NEARMAP
YYMMDD: 241207
SIZE A3 1:11000

E 6M TO 10M WIDE - FSAR 250414 SB DP
D MOD LOT 14, 16 + BALANCE 250410 SB DP
C ADJUST LOT 120 PAD 250313 SB DP
B PER EMAIL 12.03.2025 250312 SB DP
A BASE PKF BUL RD1 232R 250310 SB DP
REV DESCRIPTION YYMMDD DRAWN APPR'D

Lot 9001 Stock Rd & 9002 Yarrimbah Dr, Bullsbrook
City of Swan

REF NO. PKF BUL
DRAW NO. RD1 240
REV. E



COMPARISON		PKF BUL RD1 240D (PROPOSED)	
PKF BUL RD1 235A (PREVIOUSLY APPROVED)		PKF BUL RD1 240D (PROPOSED)	
	LOT BOUNDARIES		LOT BOUNDARIES
	BUILDING ENVELOPE		BUILDING ENVELOPE
	500m BUFFER TO CLAY QUARRY		BUFFER TO CLAY QUARRY PER 2024 APPROVAL
	W-TANK INDICATIVE WATER TANK LOCATION		W-TANK INDICATIVE WATER TANK LOCATION

CADASTRAL INFORMATION
SOURCE: MNG
YYMMDD: -250224
DWG REF: -
105441lots-9999s-MGA94z50
PROJECTION: - MGA94z50

HATCH
AERIAL PHOTOGRAPHY
SOURCE: NEARMAP
YYMMDD: 241207
SIZE A3 1:10000

0 metres 100 200 300 400 500

SUBDIVISION COMPARATIVE PLAN
Lot 9001 Stock Rd & 9002 Yarrimbah Dr, Bullsbrook
City of Swan

A AMEND PROPOSED
A FIRST ISSUE
REV DESCRIPTION

250410
250328
YYMMDD

SB
SB
DRAWN

DP
DP
APPR'D

REF NO.
PKF BUL

DRAW NO. REV.
RD1 241 B

DISCLAIMER: ISSUED FOR DESIGN INTENT ONLY. ALL AREAS AND DIMENSIONS ARE SUBJECT TO DETAIL DESIGN AND SURVEY