

Job Ref: 10080
2 September 2025

Shire of Murray
1915 Pinjarra Road
PINJARRA 6208

Attention: Planning Services

Dear Sir/Madam

**Application for Retrospective Development Approval
Lot 24 (No. 34) Kirkham Road, Meelon**

Rowe Group acts on behalf of Fruitico Investments Pty Ltd ('Client'), being the owner and proprietor of Lot 24 (No. 34) Kirkham Road, Meelon ('subject site'). We have been instructed by our Client to prepare and lodge an Application for retrospective Development Approval for a rural workers' accommodation at the subject site.

In support of this Application, please find enclosed the following documentation:

- A completed and signed Shire of Murray Application for Development Approval Form and Checklist and Peel Region Scheme Form 1;
- A copy of the current Certificate of Title;
- A copy of the Development Plans; and
- An accompanying Bushfire Management Plan.

SUBJECT SITE

The subject site is located within the municipality of the Shire of Murray ('Shire'), situated within the suburb of Meelon. The subject site is located approximately 11 kilometres south of the Pinjarra townsite and approximately 28 kilometres southeast of the Mandurah City Centre.

Refer **Figure 1 – Regional Location** and **Figure 2 – Local Location**.

The subject site is approximately 64.8 hectares in total size and is legally described as follows:

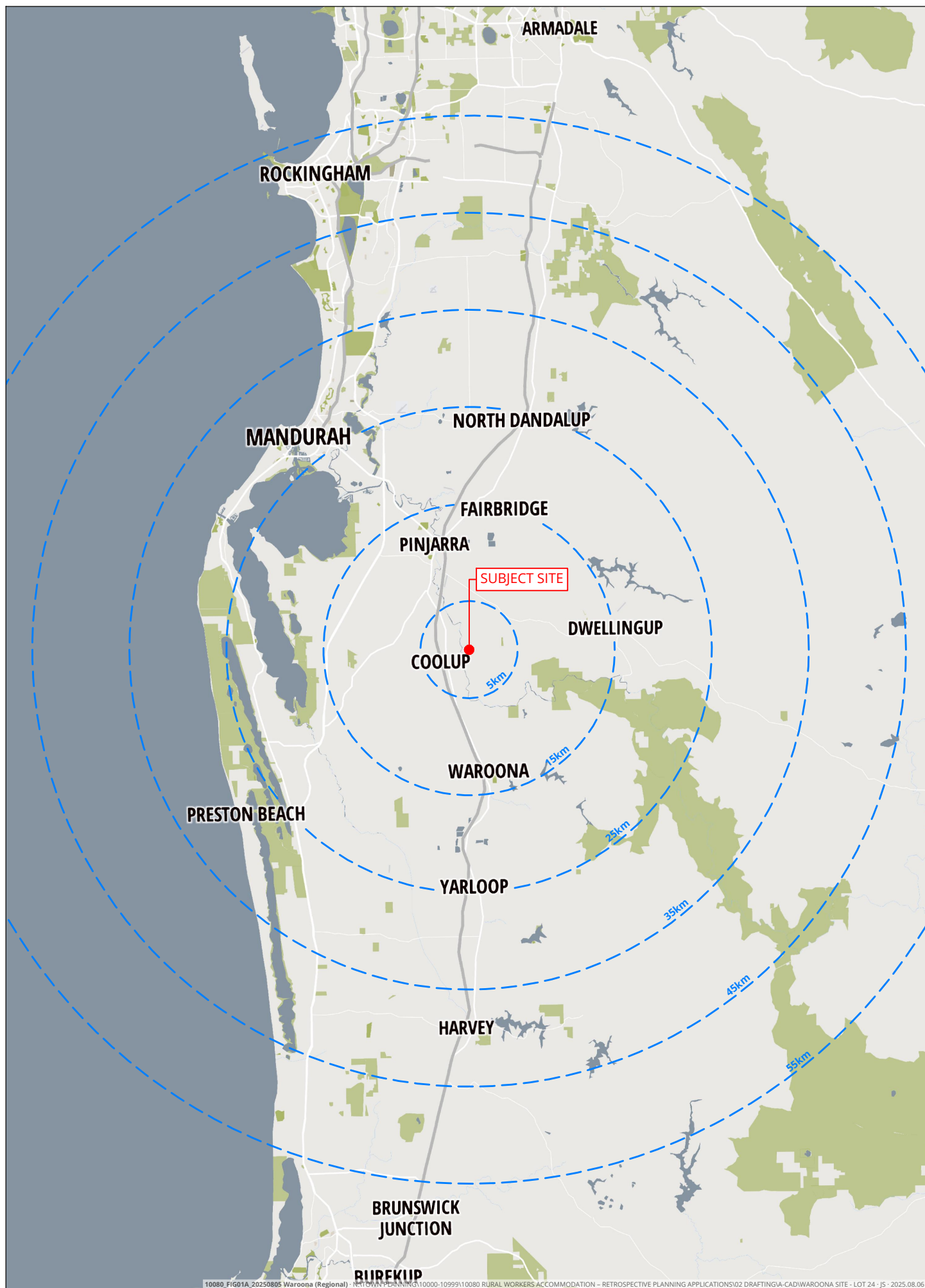
- Lot 24 on Deposited Plan 235002 Certificate of Title Volume 1203 Folio 508.

Refer **Figure 3 – Site Plan** and **Attachment 1 - Certificate of Title**.



Level 3
369 Newcastle Street
Northbridge 6003
Western Australia

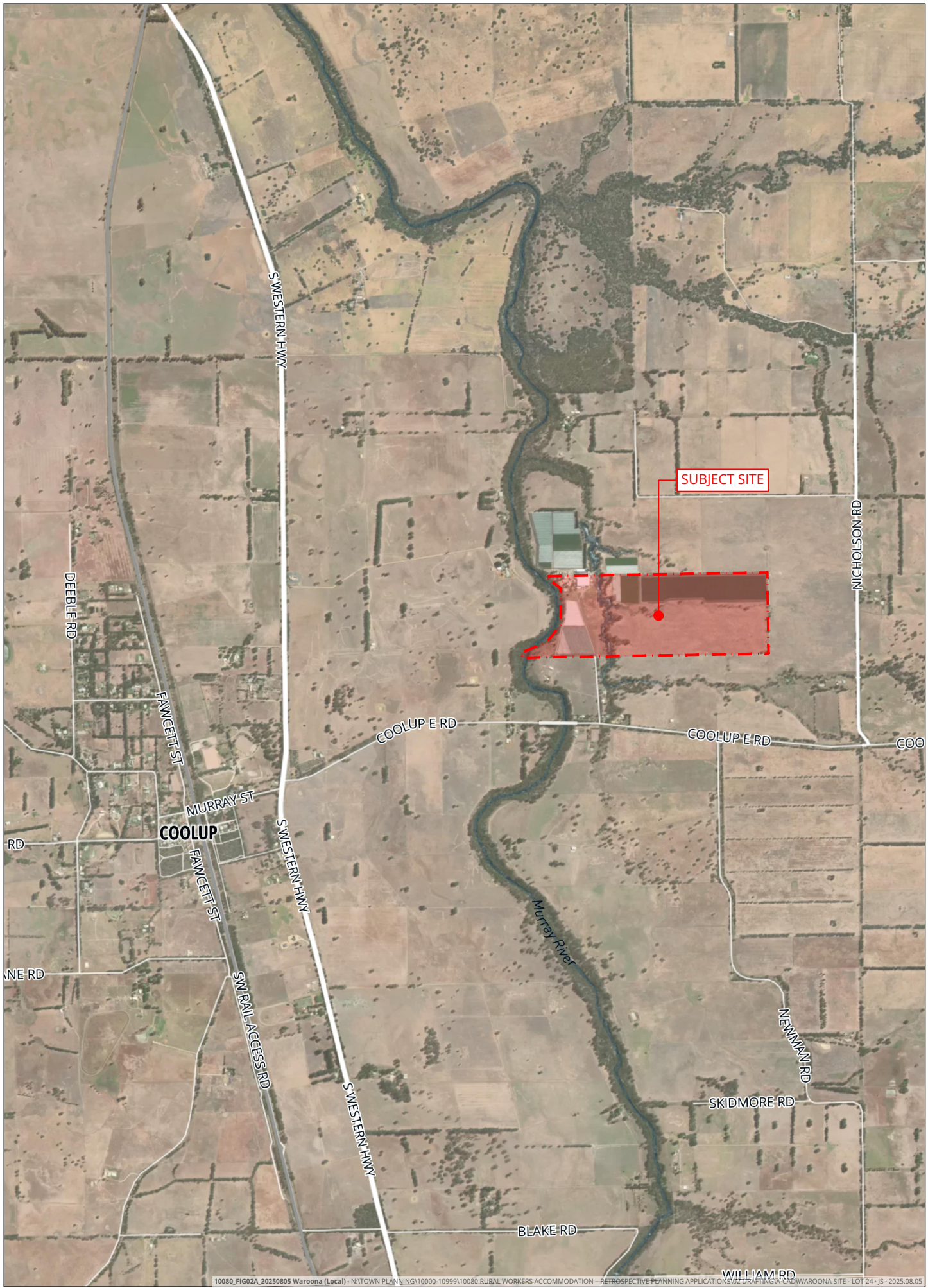
p: 08 9221 1991
f: 08 9221 1919
info@rowegroup.com.au
rowegroup.com.au



0 12,500 m
SCALE @ A4: 1:500,000



FIGURE 1
REGIONAL LOCATION



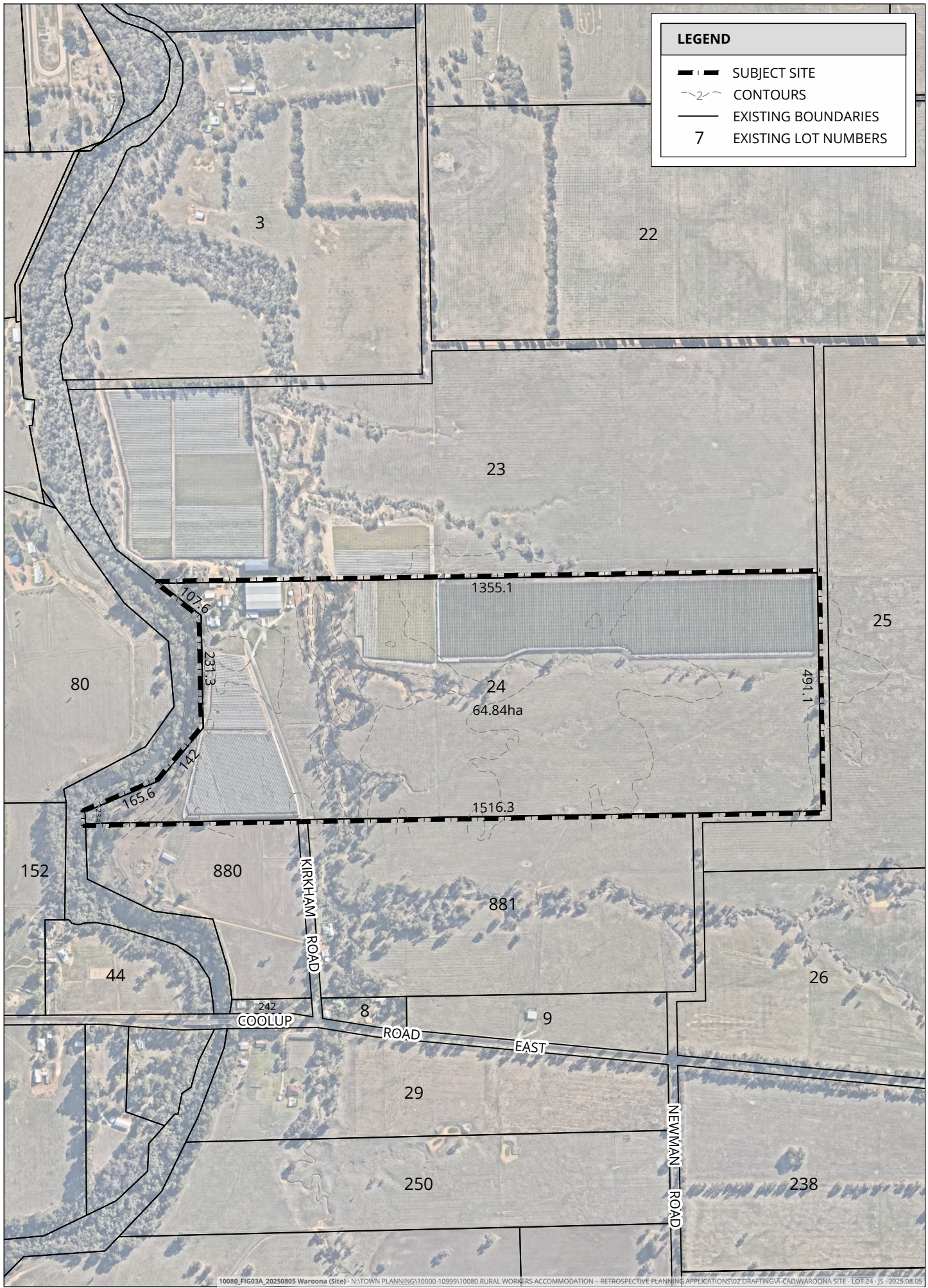
10080_FIG02A_20250805 Waroona (Local) - N: TOWN PLANNING\10000-10999\10080 RURAL WORKERS ACCOMMODATION - RETROSPECTIVE PLANNING APPLICATIONS\22 DRAFTING\CAO\WAROONA SITE - LOT 24 - JS - 2025.08.05



0 750 m
SCALE @ A4: 1:30,000



FIGURE 2
LOCAL CONTEXT



10080_FIG03A_20250805 Waroona (Site) - N:1TOWN PLANNING\10000-10999\10080 RURAL WORKERS ACCOMMODATION - RETROSPECTIVE PLANNING APPLICATIONS\02 DRAFTING\A-CAD\WAROONA SITE - LOT 24 - JS - 2025.08.05



0 250 m
SCALE @ A4: 1:10,000



FIGURE 3
SITE PLAN

PROPOSED DEVELOPMENT

This Application seeks retrospective Development Approval for a rural workers' accommodation located in the northwest corner of the subject site. This Application proposes two (2) workers' accommodation dwellings in the form of three (3) 'donga' style residential buildings. 'Donga 1 and 2' features eight (8) rooms, measuring approximately 9m² in size, that are separated by an enclosed kitchen dining and living area. The rooms of Donga 1 and 2 are separated by shared bathrooms.

'Donga 3' features four (4) rooms that are approximately 10.8m² in size and all include a bathroom. Donga 3 features a covered patio area that connects to Donga 1 and 2 and is approximately 21.2m² in size. Overall, the entire development is approximately 245.4m² in size with a height of 3.1m.

The proposed development is intended to accommodate workers during the grape growing season for specific activities at the subject site.

Refer **Attachment 2 – Development Plans.**

TOWN PLANNING CONSIDERATIONS

Peel Region Scheme

Under the provisions of the *Peel Region Scheme* ('PRS'), the subject site is zoned 'Rural'.

Refer **Figure 4 – Peel Region Scheme Zoning.**

Shire of Murray Local Planning Scheme No. 4

The subject site is zoned 'Rural' under the provisions of the *Shire of Murray Local Planning Scheme No. 4* ('LPS4').

Refer **Figure 5 – Local Planning Scheme No. 4 Zoning.**

Land Use Permissibility

The existing rural workers' accommodation is consistent with the 'Rural Worker's Dwelling' land use classification under LPS4. Appendix 1 of LPS4 defines the Rural Worker's Dwelling as follows:

Rural Worker's Dwelling – means a dwelling which is located upon land on which there is already erected a single house, where:

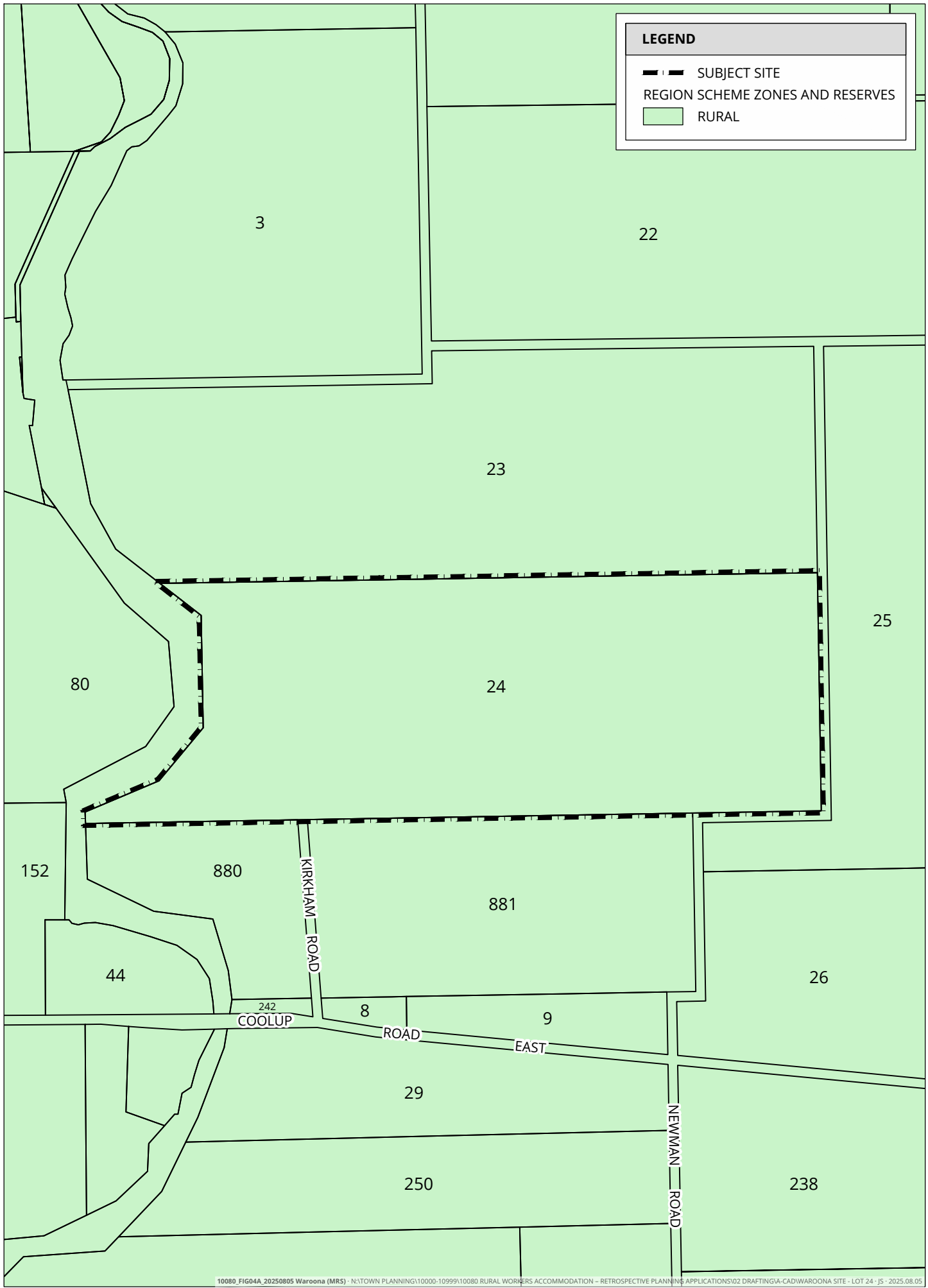
- a) *The dwelling is occupied by persons engaged in intensive agriculture, rural industry, rural pursuit, stables or winery on the same land;*
- b) *Only one such dwelling is located on a lot, and all applications for additional dwellings are dealt with on an individual basis via a report to Committee and Council; and*



- c) *All such dwellings are located within close proximity to the existing single house and share services where practical.*

The Zoning Table of LPS4 stipulates the Rural Worker's Dwelling land use class as an 'AA' (Advertisement) use within the Rural zone, meaning the use is capable of approval. Clause 5.2.2 of LPS4 defines an 'AA' use as follows:

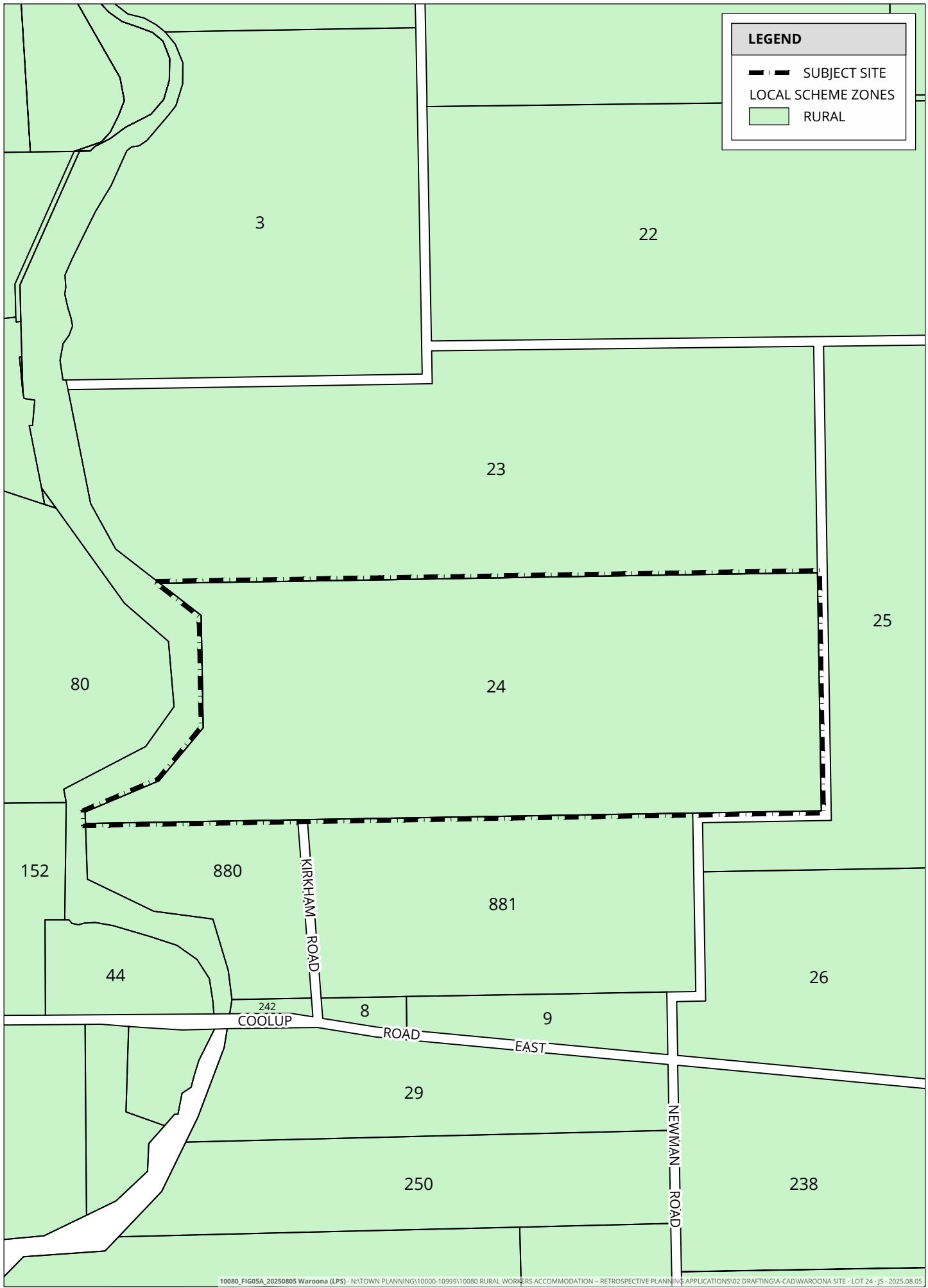
"AA – Uses which the Council may at its discretion permit provided it is satisfied that such use would not be contrary to the orderly and proper planning of the area."



0 250 m
SCALE @ A4: 1:10,000



FIGURE 4
PEEL REGION SCHEME ZONING



0 250 m
SCALE @ A4: 1:10,000



FIGURE 5
SHIRE OF MURRAY TOWN PLANNING SCHEME No.4 ZONING

DEVELOPMENT STANDARDS

Local Planning Policy – Rural Workers’ Dwellings

The Shire of Murray *Local Planning Policy – Rural Workers’ Dwellings* (‘LPPRWD’) has been adopted with the purpose of providing provisions for the development of Rural Workers’ Dwellings within the Shire. The objectives of the LPPRWD are stipulated below:

1. *“Make provision for genuine Rural Workers Dwellings in circumstances where it can be demonstrated that it is necessary or desirable to the carrying out of a rural enterprise to have employees living onsite;*
2. *Ensure that the development of Rural Workers Dwellings do not encourage the future subdivision of land;*
3. *Ensure that Rural Workers Dwellings do not prejudice the agricultural use of land or result in land use conflicts; and*
4. *Ensure that Rural Workers Dwellings are sited, designed and scaled in a manner that respects the rural landscape character of the area and does not have a detrimental impact upon the environmental attributes and amenity of the area.”*

The table below provides an assessment of the development against the provisions of the LPPRWD:

PROVISION / REQUIREMENT	COMMENT
<i>A single house must have already been established on the land or be intended to be established on the land at the same time as the Rural Workers Dwelling.</i>	There is an existing single house at the subject site.
<i>The Rural Workers Dwelling must only be occupied by a person or persons employed or otherwise engaged in activities associated with an intensive agriculture, rural industry, rural pursuit, stables or winery on the land</i>	The occupants of the rural workers’ dwelling are employed for the agricultural activities at the subject site.
<i>Only one Rural Workers Dwelling may be located on a lot, or up to two such dwellings where the lot has an area of at least 75 hectares.</i>	<p>The subject site has an area of approximately 64 hectares. Therefore, only one rural workers dwelling is permitted. Notwithstanding, the Fruitico business operations on both Lots 24 and 23 Kirkham Road. This means the actual farm area associated with the subject dwellings is 128ha.</p> <p>Additionally, and despite the proposed development consisting of two (2) dwellings, the covered patio area connects both dwellings together effectively forming a single dwelling equivalent. This construction</p>

	<p>methodology ensures there is no encouragement of subdivision; the number of individual units is commensurate with the number of workers required on site to undertake the agricultural activities; and clearly does not impact on the predominant agricultural use of the land.</p> <p>In any event, the LPP provides for a level of discretion where additional dwelling units can be permitted at discretion. Pursuant to the above justification, we submit that the existing workers dwellings meet the policy objectives and is consistent with the LPP.</p>
<i>The Rural Workers Dwelling should be sited to minimise impact on the landscape and environment and wherever possible form part of an existing group of buildings to which it relates. Either isolated or visually prominent locations should be avoided. Special consideration should be given for the relationship between the new dwelling and existing rural buildings, trees and other landscape features</i>	The rural workers dwelling is located appropriately, forming a part of the existing group of buildings (single house, barn, shed and other associated outbuildings).
<i>The Rural Workers Dwelling should share the same road access and power services, unless it can be demonstrated that this is impractical or undesirable in a particular instance</i>	The rural workers dwelling is accessed via the main entrance to the subject site.
<i>The Rural Workers Dwellings should also be sited in a manner that minimises the impact on the suitability of the land to be used for rural purposes, is separated from potentially conflicting land uses, such as stables, intensive livestock operations or livestock yards, on either the subject land or adjacent land</i>	The operations undertaken within the buildings situated close to the rural workers dwelling do not cause any adverse impacts on the development, in regard to noise and odour issues.

Table 1: Assessment Against Local Planning Policy – Rural Workers’ Dwelling

Based on the above, the existing rural workers’ accommodation is adherent to the provisions of the LPPRWD and therefore is capable of approval.



Local Planning Policy – Relocated Dwellings

The Shire of Murray *Local Planning Policy - Relocated Dwellings* ('LPPRD') has been adopted with the purpose of encouraging the establishment of relocated dwellings in a design that is compatible with the character and amenity of the surrounding area whilst ensuring a high standard of design.

The table below provides an assessment of the proposed development against the provisions of LPPRD.

STANDARD / REQUIREMENT	COMMENT
<i>The style, construction and design of relocated dwellings are to be compatible with the character of the surrounding area. There is a presumption in favour of establishing relocated dwellings within rural areas or well established urban areas which have existing dwelling stock in a similar style and character to the proposed relocated dwelling. There is a presumption against the establishment of relocated dwellings in modern residential estates, unless it can be demonstrated that the design and condition of the relocated dwelling will not adversely impact on the character and amenity of the area.</i>	<p>The proposed development has been designed to be compatible with the existing rural nature of the site.</p> <p>The site is zoned 'Rural' and is therefore a suitable location for such a development.</p>
<i>In rural areas the relocated dwelling is to be sited to minimise impact on the landscape, environment and streetscape. Visually prominent locations should be avoided. Special consideration should be given for the relationship between the relocated dwelling and any existing buildings, trees and other landscape features.</i>	<p>The proposed development is incidentally positioned to the rural buildings at the site and therefore compliant.</p>
<i>Where a building envelope exists for a property, the relocated dwelling is to be located entirely within the building envelope. If no building envelope exists, the setbacks stipulated in the Shire's Town Planning Scheme or relevant local planning policy for the particular area are to be met.</i>	
<i>In the 'Rural' zone, the relocated dwelling is to be sited in a manner that minimises the impact on the use of the land for rural purposes and so that it is separated from any potentially conflicting land uses, such as stables, intensive livestock operations or livestock yards, either on the subject land or adjacent land.</i>	<p>As previously mentioned, the location of the proposed development is positioned incidentally to the existing buildings present on site. The location of the accommodation does not create any land use conflicts with the existing buildings.</p>
<i>Prefabricated transportable dwellings in a style similar to dwellings commonly used on mining camps are not to be used as dwellings within urban areas of the Shire.</i>	<p>Compliant.</p>

<p><i>To enhance the standard of the relocated dwelling or its compatibility with the surrounding area the Shire may require:</i></p> <p><i>a) alterations to the roof or the addition of verandas, window awnings or other design features to the relocated dwelling.</i></p> <p><i>b) the external walls of the relocated dwelling to be painted, reclad or otherwise upgraded.</i></p> <p><i>c) the planting and ongoing maintenance of suitable vegetation on the property.</i></p>	Noted.
<p><i>The relocated dwelling is to be upgraded if necessary to ensure it meets a high functional standard. In particular electrical wiring, plumbing, gutters and down pipes, flooring, doors and windows are to be functioning in the correct manner.</i></p>	The proposed development is of high functionality in regard to the identified elements.
<p><i>The relocated dwelling is to meet the 'Class 1' building and energy efficiency requirements of the Building Code of Australia.</i></p>	This is to be assessed at the Certificate of Design Compliance stage
<p><i>The relocated dwelling is to be structurally sufficient for transportation and reestablishment on the new site.</i></p>	Compliant.
<p><i>The relocated dwelling is to be connected to a reticulated sewerage system if available, otherwise to an appropriate onsite effluent disposal system.</i></p>	The proposed development is connected to the existing effluent disposal system located on-site.
<p><i>The relocated dwelling must be connected to a reticulated water system if available, otherwise provision must be for a supply of potable water from either an underground bore or a rainwater storage system with a minimum capacity of 90,000 litres, or a combination of these methods.</i></p>	The proposed development is connected to the rainwater storage system located on-site.

Table 2: Assessment Against Local Planning Policy – Relocated Dwellings.

STATE PLANNING POLICIES

State Planning Policy 3.7 – Bushfire

In accordance with the *Department of Fire and Emergency Services* ('DFES') Map of Bushfire Prone Areas, the western portion of the subject site is identified as 'Bushfire Prone'. This means a Bushfire Management Plan (BMP) is required in order to satisfy the provisions outlined with *State Planning Policy 3.7 – Bushfire* ('SPP3.7'). In this instance a BMP has been prepared for the subject development, which concludes the accommodation meets a BAL 12.5 rating. The BMP is attached in full at **Attachment 3**.

Draft State Planning Policy 2.9 – Planning for Water

The *Western Australian Planning Commission* ('WAPC') is currently preparing *Draft State Planning Policy 2.9 – Planning for Water* ('Draft LPP2.9') and the associated guidelines with the intention of streamlining WA's current water-related policy framework. This aims to ensure that planning and development considers appropriate water management measures to achieve optimal water resource outcomes. Based on the draft guidelines, the subject site is identified to be located within the 'Estuary Catchment on the Swan Coastal Plain' and 'within 1 kilometre of a significant wetland'.

Notwithstanding, the subject site is not identified as sewerage sensitive. We understand the accommodation is connected to the existing approved septic system, located in proximity to the existing home.

The enclosed kitchen dining area associated with the accommodation is also connected to the existing approved septic system. The proponent of the agricultural business at the subject site has advised that the septic system has never failed due to overloading and therefore this Application is submitted on the basis that the existing conditions are satisfactory to the standards and requirements of Draft SPP2.9.

CONCLUSION

In summary, this application seeks retrospective Development Approval for a rural workers' accommodation at the subject site. The development is adherent to the applicable provisions of the Shire of Murray Local Planning Scheme No. 4 and the Shire's Local Planning Policy framework, in particular 'Rural Workers' Dwellings' and 'Relocated Dwellings'. The development is consistent with the Shire's local planning framework and due to its siting with an established vineyard, does not adversely impact the surrounding area.

On this basis, it is requested that the Shire grants retrospective Development Approval for the Rural Workers' Accommodation at the subject site, pursuant to the attached development plans. Should you require any further information or clarification in relation to this matter, please contact Peter Stuart on 9221 1991.

Yours faithfully,



Peter Stuart

Rowe Group



Attachment One

Certificate of Title

WESTERN



AUSTRALIA

TITLE NUMBER

Volume

Folio

1203

508

RECORD OF CERTIFICATE OF TITLE UNDER THE TRANSFER OF LAND ACT 1893

The person described in the first schedule is the registered proprietor of an estate in fee simple in the land described below subject to the reservations, conditions and depth limit contained in the original grant (if a grant issued) and to the limitations, interests, encumbrances and notifications shown in the second schedule.

BGRoberts
REGISTRAR OF TITLES



LAND DESCRIPTION:

LOT 24 ON DEPOSITED PLAN 235002

REGISTERED PROPRIETOR: (FIRST SCHEDULE)

FRESH PRODUCE GROUP WESTERN AUSTRALIA PTY LIMITED OF LEVEL 2 20 BOND STREET SYDNEY NSW
2000

(T Q252793) REGISTERED 24/2/2025

LIMITATIONS, INTERESTS, ENCUMBRANCES AND NOTIFICATIONS: (SECOND SCHEDULE)

1. Q287307 MORTGAGE TO NATIONAL AUSTRALIA BANK LIMITED OF LEVEL 3 2 CARRINGTON STREET
SYDNEY NSW 2000 REGISTERED 20/1/2025.

Warning: A current search of the sketch of the land should be obtained where detail of position, dimensions or area of the lot is required.
Lot as described in the land description may be a lot or location.

-----END OF CERTIFICATE OF TITLE-----

STATEMENTS:

The statements set out below are not intended to be nor should they be relied on as substitutes for inspection of the land
and the relevant documents or for local government, legal, surveying or other professional advice.

SKETCH OF LAND: 1203-508 (24/DP235002)
PREVIOUS TITLE: 1034-791
PROPERTY STREET ADDRESS: 43 KIRKHAM RD, MEELON.
LOCAL GOVERNMENT AUTHORITY: SHIRE OF MURRAY

NOTE 1: O492384 DEPOSITED PLAN 419543 LODGED

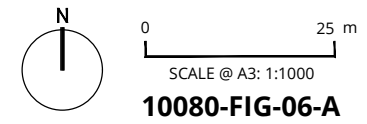


Attachment Two

Development Plans



SITE PLAN
LOT 24 (No.42) KIRKHAM ROAD
MEELON

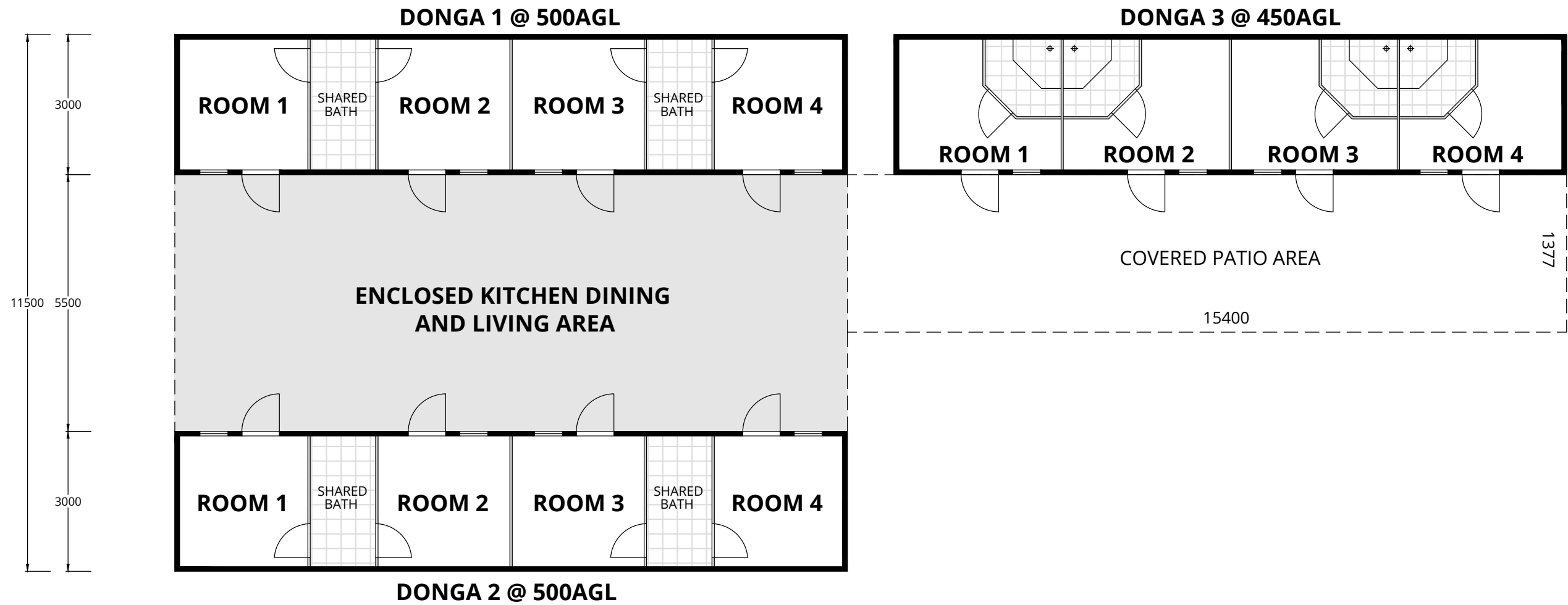
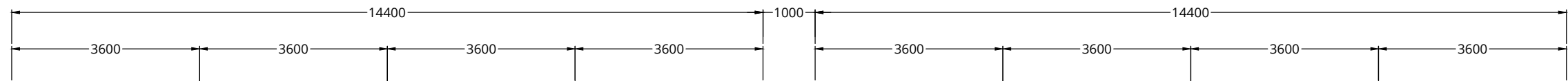


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CADASTRE: LANDGATE

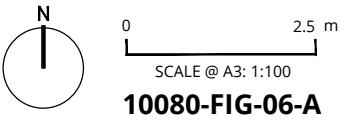
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2025.08.18
MGA50 GDA94
LANDGATE

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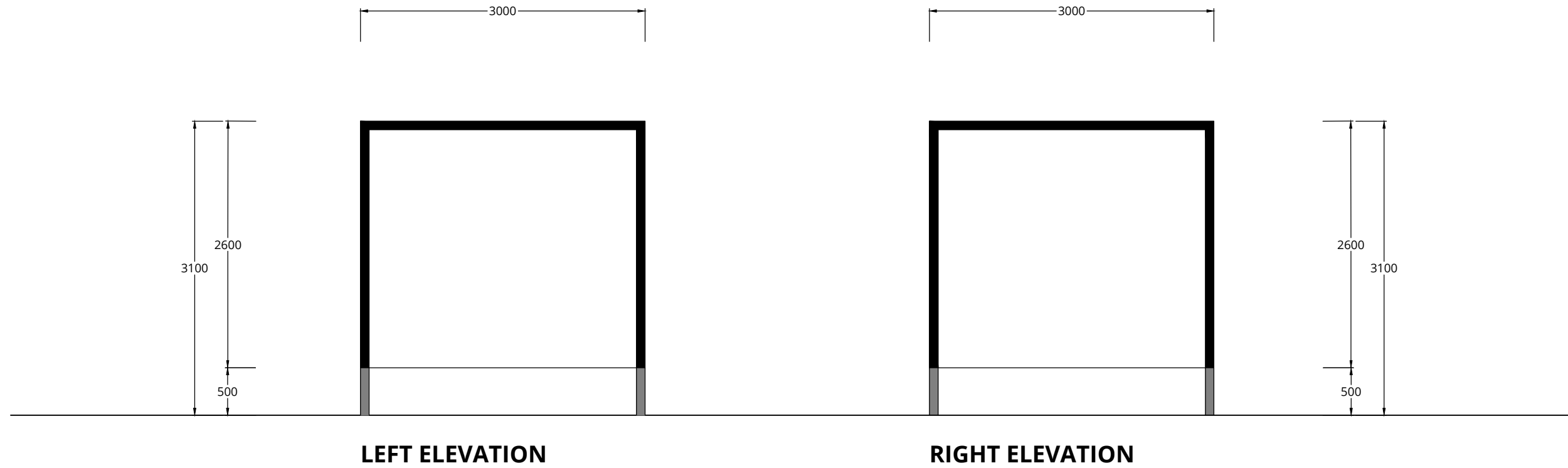
DONGA 1, 2 & 3 FLOOR PLAN
LOT 24 (No.43) KIRKHAM ROAD
MEELON



DRAWN: JS
DATE CREATED: 2025.08.19
PROJECTION: MGA50 GDA94
CADASTRE: LANDGATE

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N:\TOWN PLANNING\10000-10999\10080 RURAL WORKERS ACCOMMODATION - RETROSPECTIVE PLANNING APPLICATIONS\02 DRAFTING\A-CAD\MEELON SITE - LOT 24 - JS - 2025.08.18

LEFT AND RIGHT DONGA ELEVATIONS

LOT 24 (No.43) KIRKHAM ROAD

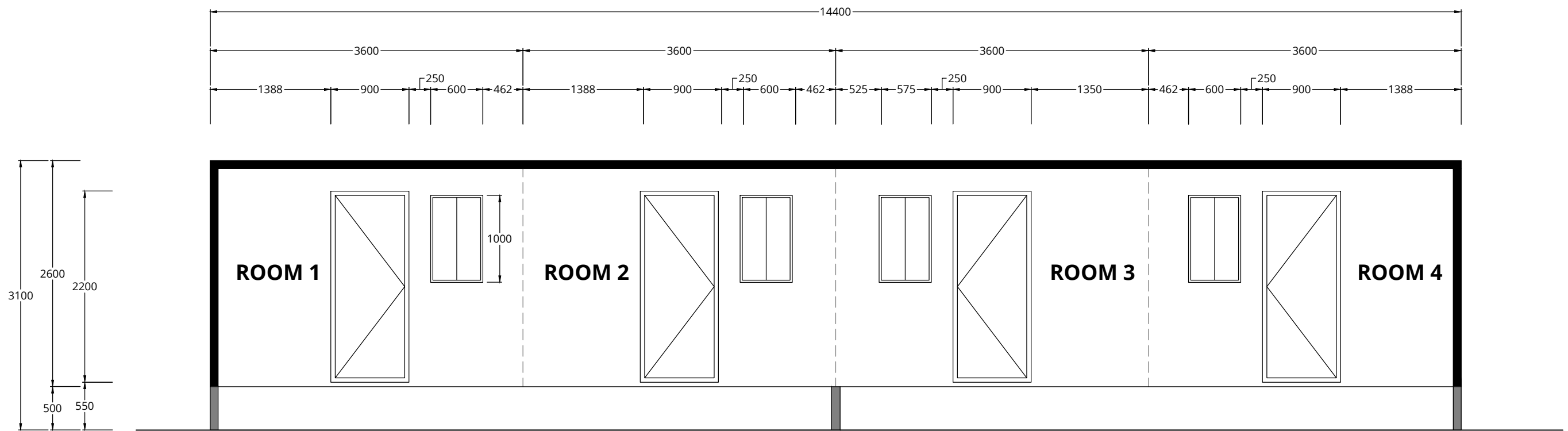
MEELON

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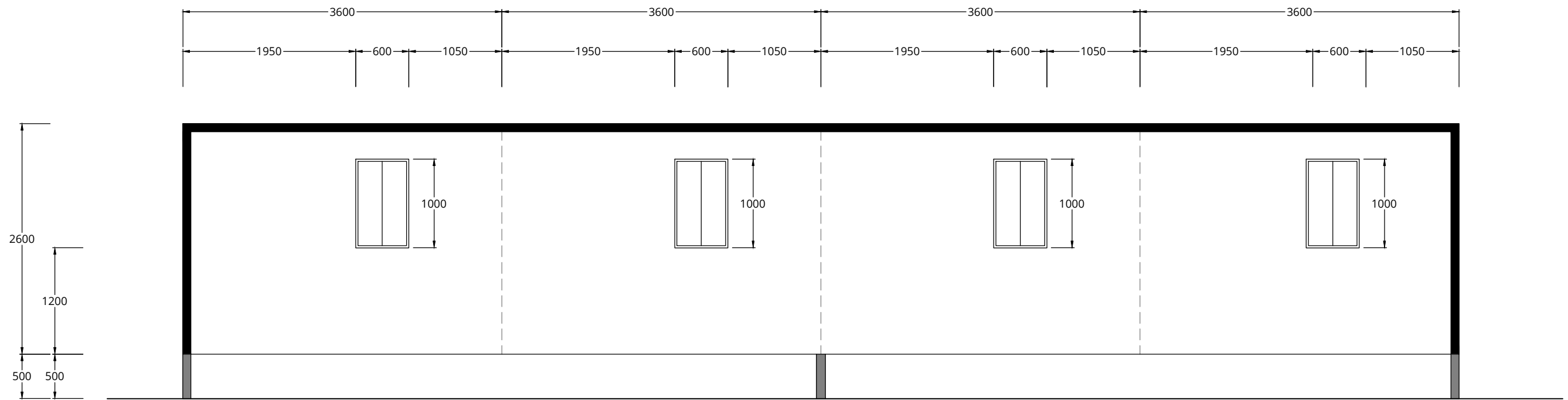
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ROWE
GROUP



FRONT ELEVATION



REAR ELEVATION



Attachment Three

Bushfire Management Plan

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:			
Suburb:	State:	Postcode:	
Local government area:			
Description of the planning proposal:			
BMP / Reference number:	Version:	Date of issue:	
Client / Business name:			

Reason for referral to DFES¹

	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.)?

--

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
Company		Contact No.	

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	
---------------------------	--	------	--

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

Bushfire Management Plan

Lot 24 (No.43) Kirkham Road, Meelon

Shire of Murray

Date: 1 September 2025

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 a development application for a new commercial development at Lot 24 (No.43) Kirkham Road, Meelon (the Site).

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 achieved.

Document Control: Report Details		
Report version	Report Date	Version Details
V1.1	1 September 2025	Original
BPAD Practitioner	Jemma Douglas (Level 2)	BPAD-38400

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Appendix 2: Development Plans

1. INTRODUCTION

Bushfire Logic has been engaged to prepare a Bushfire Management Plan (BMP) to support a development application for two (2) workers' accommodation dwellings at Lot 24 (No.43) Kirkham Road, Meelon.

The site is partially within a declared Bush Fire Prone Area 2 (BFP2) and the proposed development 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 is zoned ‘Rural’ under the Peel Region Scheme and ‘Rural’ under Shire of Murray Local Planning Scheme No.4 (LPS 4). The subject site contains a number of buildings including an existing single house and is used for commercial fruit production. The site takes direct access from Kirkham Road and adjoins the Murray River to the eastern boundary.

Address Details	Street no. 43	Lot no. 24	Street name Kirkham Road
	Suburb & State Meelon, Western Australia		
Local government area	Shire of Murray		
Main BCA class of the building	N/A	Use(s) of the existing building	Existing Commercial Fruit Production Site
Description of the building or works	Two (2) workers' accommodation dwellings		



Figure 1: Location Map for Subject Site

1.2 DEVELOPMENT PROPOSAL

The proposal is for the approval of a two (2) workers' accommodation dwellings.

Existing land use	Commercial Fruit Production Facility
Proposed land use:	Two (2) workers' accommodation dwellings
Region Planning Scheme:	Rural
Local Planning Scheme	Rural
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 portions of the site are 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.

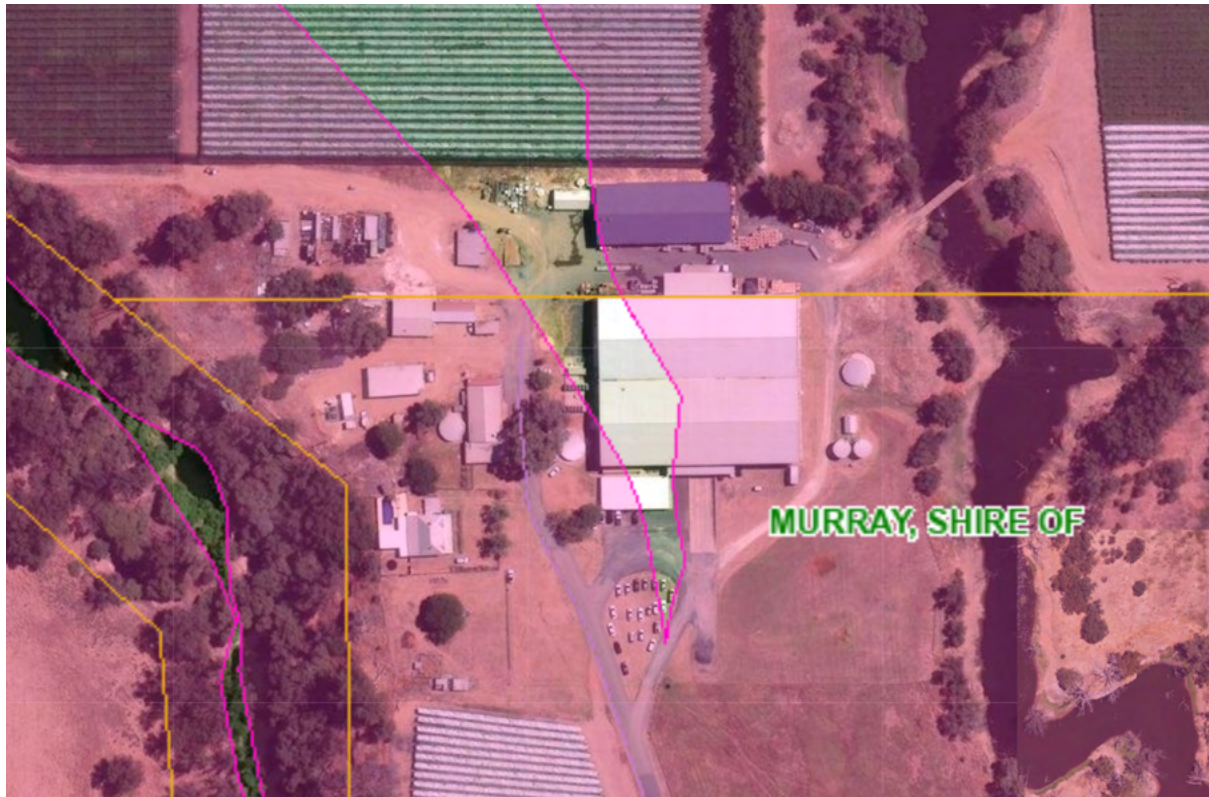


Figure 2: Map of Bushfire Prone Areas and relevance to subject site (OBRM, 2024)

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 Planning in Bushfire Prone Areas 2015
- Guidelines for Planning in Bushfire Prone Areas (1.4)
- *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

The proposed development does not require the clearing of vegetation. A review into 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 or attributes 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?	No. The application does not propose any vegetation modification or clearing works.	
Environmental Value	Mapped as occurring within or adjacent to the project area	Description
Wetlands	Yes	The subject land is adjacent to (but not within) the Murray River which is listed as a conservation category wetland. The proposed development does not impact the river.
Waterway Control Area	No	The development site is not located within the Swan-Canning Water Catchment Area.
Commonwealth Threatened Ecological Communities listed under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (the EPBC Act)	No	The subject land is not listed as containing any threatened ecological communities or listed fauna or flora species.
Fauna habitat listed under the EPBC Act	Yes	The subject land contains land that is listed as requiring investigation for feeding habitat for the Black Cockatoo species. The proposed development does not impact on this vegetation.
Bush Forever Site	No	The development site is not adjacent to 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 development site.

2.3 REVEGETATION/LANDSCAPE PLANS

It is not expected that additional landscaping will be required around the proposed accommodation units. Notwithstanding, if a landscaping plan is required as a condition of development approval, it will be the subject of review by the local government at which point consideration can be given to planting species and densities proposed. This will ensure that landscaping does not result in changes to the bushfire attack level ratings.

3. BUSHFIRE ASSESSMENT RESULTS

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

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 ☐

Table 2.7

FDI 50 ☐

Table 2.6

FDI 80 ☒

Table 2.5

FDI 100 ☐

Table 2.4

3.1.2 Vegetation Classification

A site assessment was undertaken on 21 August 2025. All vegetation within 150m of the subject site was classified in accordance with Clause 2.2.3 of AS 3959-2018. Each 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 with detailed plot data provided in Appendix 1.

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

Plot	Vegetation Classification	Effective Slope	Comment
1	Class G Grassland	Downslope 6 degrees	Plot 1 is characterised by areas tall grassland surrounding vineyards and adjoining the woodland along the banks of the Murray River. Not proposed to be altered through development.
2	Class B Woodland	Downslope 8 degrees	Plot 2 is characterised by eucalyptus trees along the banks of the Murray River with tall prominent grasses as the understory. Not proposed to be altered through development.

3	Class B Woodland	Flat/Upslope	Plot 3 is characterised by eucalyptus trees along the banks of the Murray River with tall prominent grasses as the understory. Not proposed to be altered through development.
4	Class D Scrub	Flat/Upslope	Plot 3 is characterised by dense trees and shrubs. Not proposed to be altered through development.
5	Excluded 2.2.3.2(e) & (f) – Non-vegetated areas and low threat vegetation	N/A	Plot 5 includes areas permanently cleared of vegetation including existing buildings, outbuildings driveways and carparking area. Plot 5 also includes areas of vegetation maintained in to a low threat fuel state in perpetuity including lawns, gardens and vineyards.

3.2 ASSESSMENT OUTPUT

3.2.1 Bushfire Attack Level Results

The vegetation assessment completed above allows for consideration of the radiant heat flux that the proposed development will be exposed to from a bushfire. Table 3 below provides an indication of the separation distance that will be required between the proposed development and each of the vegetation plots within the assessment area to achieve the corresponding BAL rating.

Table 3: AS3959:2018 Vegetation Separation Distances to Corresponding Radiant Heat Impact

Plot	Vegetation Classification	Effective Slope	Separation distances required (m)				
			BAL-FZ	BAL-40	BAL-29	BAL-19	BAL-12.5
1	Class G Grassland	Downslope 6 degrees	<8	8-<10	10-<16	16-<23	23-<50
2	Class B Woodland	Downslope 8 degrees	<16	16-<22	22-<31	31-<43	43-<100
3	Class B Woodland	Flat/Upslope	<10	10-<14	14-<20	20-<29	29-<100
4	Class D Scrub	Flat/Upslope	<10	10-<13	13-<19	19-<27	27-<100
5	Excluded 2.2.3.2(e) & (f) – Non-vegetated areas and low threat vegetation	N/A	N/A No separation requirements				

Figure 4: *Bushfire Attack Level Contour Map* and Table 4 below provide the indicative BAL rating(s) for the proposed development. The BAL rating gives an indication of the level of bushfire attack (i.e. the radiant heat flux) that may be received by the proposed development. The assessment and BAL contour map have been completed in accordance with the SPP3.7, the Guidelines and Method 1 methodology of AS3959-2018.

Table 4: AS3959:2018 Indicative BAL Rating for Proposed Development

Plot No.	Vegetation Classification	Effective Slope	Separation (m)	Indicative Method 1 BAL Rating
1	Class G Grassland	Downslope 6 degrees	36m	BAL-12.5
2	Class B Woodland	Downslope 8 degrees	49m	BAL-12.5
3	Class B Woodland	Flat/Upslope	89m	BAL-12.5
4	Class D Scrub	Flat/Upslope	>100m	BAL-LOW
5	Excluded 2.2.3.2(e) & (f) – Non-vegetated areas and low threat vegetation	N/A	N/A	BAL-LOW

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

The subject site is part an established rural zone and agricultural precinct with land to the north, south and east partially outside of the bushfire prone area mapping. While there remains a risk of bushfire to the site from vegetation along the Murray River, the proposed development is surrounded by established buildings, established asset protection zones and managed low threat vegetation therefore minimising the risk of bushfire to the subject site.

FIGURE 3: VEGETATION ASSESSMENT AND PHOTO POINTS
LOT 24 (NO.43) KIRKHAM ROAD, MEELON



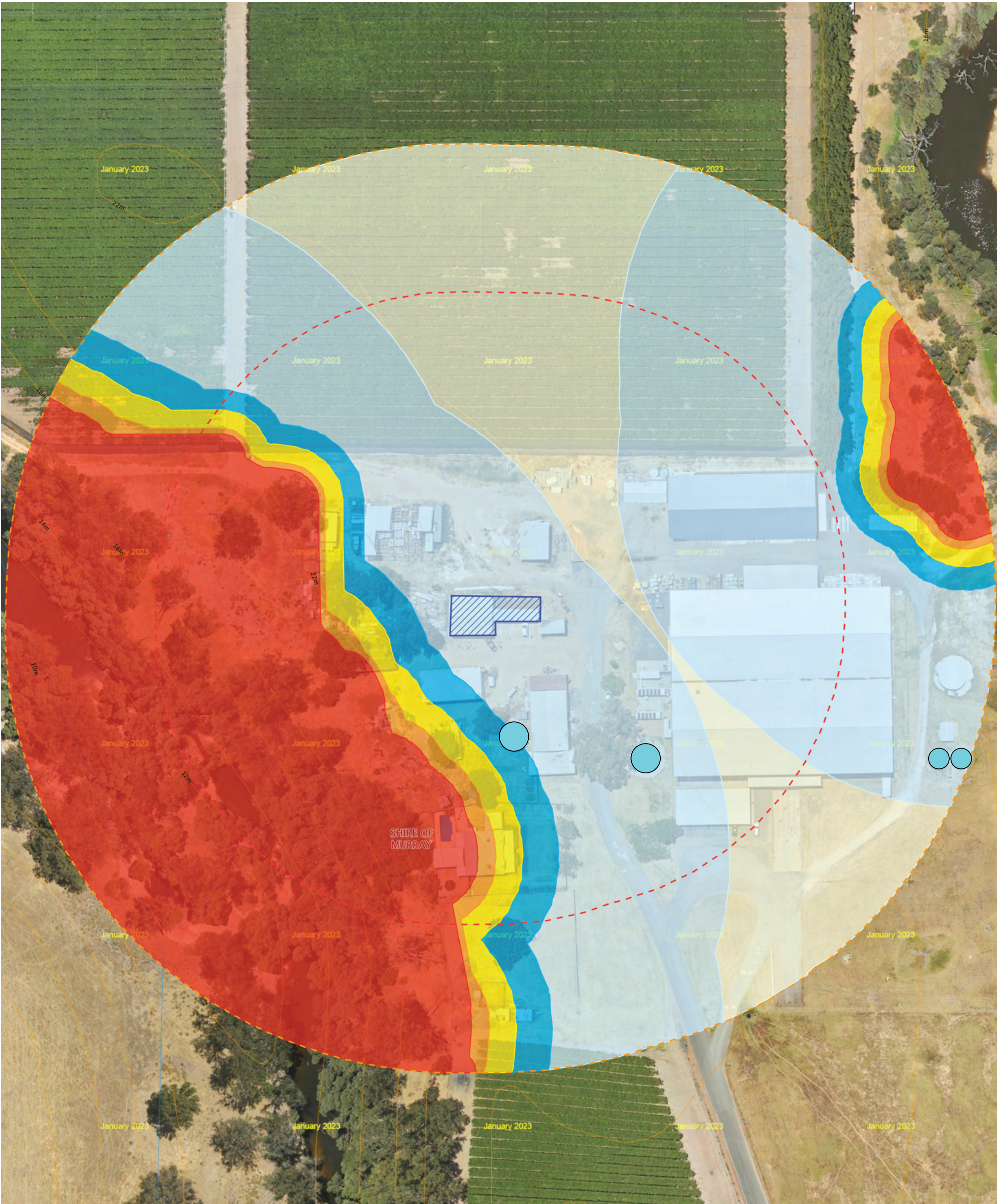
Legend

- Photopoint
- Water Tank Location
- 100m Assessment Boundary
- 150m Assessment Boundary
- Building Location

Vegetation Classification

- Excluded 2.2.3.2 (e)
- Excluded 2.2.3.2 (f)
- Class B Woodland
- Class D Scrub
- Class G Grassland

FIGURE 4: BUSHFIRE ATTACK LEVEL CONTOUR MAP
LOT 24 (NO.43) KIRKHAM ROAD, MEELON



Legend

- Photopoint
- Water Tank Location
- 100m Assessment Boundary
- 150m Assessment Boundary
- Building Location

Bushfire Attack Level Contour

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

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, 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 5.

Table 5: 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	<p>N/A</p> <p>Assessment under Element 1: Location is not required in accordance with Bushfire Protection Criteria 6: Development – Residential.</p> <p>Not required to be assessed to Element 1.</p>
Element 2 – Siting and Design			
<p>A2.1a Siting and Design</p> <p>OR</p> <p>A2.1b Siting in an area with a radiant heat impact exceeding 29 kW/m² (BAL-40 or BAL-FZ)</p>	<p><i>Habitable building achieves radiant heat impact not exceeding 29kW/m² (BAL-29)</i></p>	Yes	<p>Compliant</p> <p>A vegetation assessment has been completed in accordance with the requirements of SPP3.7, the Guidelines and AS3959 for all land within a 150-metre radius of the subject site and vegetation plots have been classified in accordance with the worst-case scenario. Figure 3: <i>Vegetation Assessment and Photo Points</i> and Figure 4: <i>Bushfire Attack Level Contour Map</i> demonstrate that the proposed development will be located within an area of BAL-12.5 with the land surrounding the building being managed to a low threat state.</p> <p>Proposal achieves Acceptable Solution A2.1.</p>
<p>A2.2 Asset Protection Zone (APZ)</p>	<p><i>Where a habitable building cannot be wholly within an area with a radiant heat impact not exceeding 29 kW/m² (BAL-29) in its predevelopment state, an APZ is to be provided.</i></p>	No	<p>N/A</p> <p>The proposed development is shown to be located within an area with a radiant heat impact of BAL-12.5 and therefore an APZ is not required.</p> <p>Not required to be assessed to A2.2.</p>

A2.3 Clearing of native vegetation	<i>Development avoids, or where unavoidable, minimises the clearing of native vegetation management.</i>	Yes	<p>Compliant</p> <p>The development site is clear of native vegetation and does not require any clearing for ongoing implementation.</p> <p>Proposal meets Acceptable Solution A2.3.</p>
A2.4 Storage of hazardous, flammable and/or combustible materials	<p><i>Materials are to be stored in an area that:</i></p> <ul style="list-style-type: none"> <i>is subject to a radiant heat impact not exceeding 29 kW/m² (BAL-29);</i> <i>is non-combustible and shields the materials to reduce their exposure to radiant heat from the bushfire to levels significantly lower than 29 kW/m² and prevents the entry of debris and embers; and</i> <i>limits to the degree necessary and practical, the escape of sources of ignition from the stored materials into bushfire prone vegetation.</i> 	Yes	<p>Compliant</p> <p>The proposed development is for accommodation buildings and does not propose the storage of any hazardous, flammable and/or combustible materials.</p> <p>Proposal meets Acceptable Solution A2.4.</p>
Element 3 – Vehicular Access			
A3.1 Private driveways	<i>There are no private driveway technical requirements (prescribed by these Guidelines) where the private driveway is within a lot serviced by reticulated water and is no greater than 70 metres in length between the most distant external part of the habitable building and the public road.</i>	Yes	<p>Compliant</p> <p>The subject land is not connected to a reticulated water network and as such requires assessment under A3.1. The layout of the subject site including existing buildings, access and car parking configurations are shown on Figure 3: <i>Vegetation Assessment and Photo Points</i>.</p> <p>The driveway for the subject site is existing and is approximately 519 metres in length from Kirkham Road to the accommodation building. The driveway is bitumen construction and is approximately 7.5 metres wide allowing for passing of vehicles and two-way vehicle movement. The driveway connects around the existing buildings providing opportunity for</p>

			<p>vehicles to turn around and exit the site in a bushfire emergency. In respect of this, the existing driveway complies with the requirements of A3.1.</p> <p>Proposal meets Acceptable Solution A3.1.</p>
Element 4 – Water Supply			
A4.1 Water supply	<p><i>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.</i></p> <p><i>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.</i></p>	Yes	<p>Compliant</p> <p>The subject site is not connected to a reticulated water network. The subject site contains numerous water tanks, including two dedicated firefighting tanks to the east of the site.</p> <p>Two existing 150,000L tanks provide water to the accommodation buildings. It is proposed that these tanks be fitted with a separate valve/coupling as per Figure 5 below which will ensure a minimum water reserve of 10,000L for firefighting purposes.</p> <div data-bbox="1243 825 1948 1219" data-label="Diagram">  </div> <p>Figure 5: Water Coupling Diagram</p>



			<p>A requirement has been included within Table 6 of this report to ensure the water tank is implemented accordingly and it is anticipated that a condition of development approval will also reflect this requirement.</p> <p>Proposal meets Acceptable Solution A4.1.</p>
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6. RESPONSIBILITIES FOR IMPLEMENTATION AND MANAGEMENT OF BUSHFIRE MEASURES

The responsibilities for implementation and management of the bushfire measures summarises the key measures identified to achieve or maintain compliance with the bushfire protection criteria of SPP3.7 and the Guidelines. These items are enforceable under S214 of the *Planning and Development Act 2005* as they form part of the development application. The following table provides the listed responsibilities.

Table 6: Developer/Landowner Responsibilities

NO.	IMPLEMENTATION ACTIONS
1	Maintain all areas shown as excludable vegetation on Figure 3: <i>Vegetation Assessment and Photo Points</i> to a low-threat fuel state to ensure the BAL rating applicable to the Workers Accommodation does not increase.
2	Maintain all driveways and turn around areas within subject site.
3	Maintain a minimum 10,000L firefighting water supply for the Accommodation Building.

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 Guidelines for Planning in Bushfire Prone Areas.

A handwritten signature in blue ink, appearing to read "Jemma Douglas".

SIGNED, ASSESSOR: DATE 1/9/2025

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*.

Government of Western Australia (GoWA) (2012). *Building Regulations 2012*.

Government of Western Australia (GoWA) (2011). *Building Act 2011*.

Government of Western Australia (GoWA) (2005). *Planning and Development Act 2005*.

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

Government of Western Australia (GoWA) (1954). *Bushfire Act 1954*.

NCC, National Construction Code (n.d.) *Building Code of Australia*. Accessed from: <https://ncc.abcb.gov.au/>

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 24 (No.43) Kirkham Road
Suburb:	Meelon
Local Government Area:	Shire of Murray
Description of works:	Two (2) workers' accommodation dwellings

Report Details		
Report Version	Assessment Date	Report Date
V1.1	21 August 2025	1 September 2025

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 G Grassland			
Exclusion Clause (if applicable)	N/A			
Effective Slope	Measured	Downslope 6 degrees	Applied Range (Method 1)	Downslope >5-10 degrees
Description/Justification:	Plot 1 is characterised by areas tall grassland surrounding vineyards and adjoining the woodland along the banks of the Murray River. Not proposed to be altered through development.			
Post Development Assumptions:	Nil			
				
Photo ID: P1		Photo ID: P2		

Vegetation Plot 2				
Classification	Class B Woodland			
Exclusion Clause (if applicable)	N/A			
Effective Slope	Measured	Downslope 8 degrees	Applied Range (Method 1)	Downslope >5-10 degrees
Description/Justification:	Plot 2 is characterised by eucalyptus trees along the banks of the Murray River with tall prominent grasses as the understory. Not proposed to be altered through development.			
Post Development Assumptions:	Nil.			

<div><div><div>S</div><div>SW</div><div>W</div><div>NW</div></div><div><div>180</div><div>210</div><div>240</div><div>270</div><div>300</div><div>330</div></div><div><div>264°W (T)</div><div>32°43'39"S, 115°53'57"E ±597ft</div><div>▲ 57ft</div></div></div> <div></div> <div><div>Bushfire Logic</div><div>21 Aug 2025, 11:48:32</div></div>	<div><div><div>W</div><div>NW</div><div>N</div><div>NE</div></div><div><div>270</div><div>300</div><div>330</div><div>0</div><div>30</div><div>60</div></div><div><div>343°N (T)</div><div>32°43'38"S, 115°53'55"E ±9ft</div><div>▲ 62ft</div></div></div> <div></div> <div><div>Bushfire Logic</div><div>21 Aug 2025, 11:50:03</div></div>
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<div><div><div>NE</div><div>E</div><div>SE</div><div>S</div></div><div><div>30</div><div>60</div><div>90</div><div>120</div><div>150</div><div>180</div><div>210</div></div><div><div>123°SE (T)</div><div>32°43'38"S, 115°53'55"E ±13ft</div><div>▲ 67ft</div></div></div> <div></div> <div><div>Bushfire Logic</div><div>21 Aug 2025, 11:50:20</div></div>	<div><div><div>E</div><div>SE</div><div>S</div><div>SW</div><div>W</div></div><div><div>90</div><div>120</div><div>150</div><div>180</div><div>210</div><div>240</div><div>270</div></div><div><div>182°S (T)</div><div>32°43'39"S, 115°53'58"E ±6ft</div><div>▲ 76ft</div></div></div> <div></div> <div><div>Bushfire Logic</div><div>21 Aug 2025, 11:57:59</div></div>
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Photo ID: P5	Photo ID: P6
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Vegetation Plot 4				
Classification	Class D Scrub			
Exclusion Clause (if applicable)	N/A			
Effective Slope	Measured	Upslope	Applied Range (Method 1)	Upslope or flat 0 degrees
Description/Justification:	Areas of scrub ranging in height from 2 metres to 5 metres with tall grasses and occasional small eucalypt trees.			
Post Development Assumptions:	Nil.			
 <p>The photo shows a landscape with a large, dark, rounded mound of earth or rock in the foreground. The ground is covered with sparse, low-lying vegetation and patches of bare soil. In the background, there is a dense line of trees and shrubs. A compass overlay at the top of the photo indicates the orientation: N (North), NE (Northeast), E (East), and SE (Southeast). The overlay also displays coordinates: 59°NE (T), 32°43'35"S, 115°54'4"E ±13ft, and an elevation of 88ft. The photo is dated 21 Aug 2025, 12:06:42.</p>				
Photo ID: P7				



Vegetation Plot 5				
Classification	N/A			
Exclusion Clause (if applicable)	2.2.3.2 (e) Non-vegetated areas 2.2.3.2 (f) Low-threat vegetation			
Effective Slope	Measured	N/A	Applied Range (Method 1)	N/A
Description/Justification:	Plot 5 includes areas permanently cleared of vegetation including existing buildings, outbuildings, driveways and carparking area. Plot 5 also includes areas of vegetation maintained in to a low threat fuel state in perpetuity including lawns, gardens and vineyards.			
Post Development Assumptions:	Nil.			
				
Photo ID: P8		Photo ID: P9		
				
Photo ID: P10		Photo ID: P11		



Photo ID: P12



Photo ID: P13



Photo ID: P14



Photo ID: P15



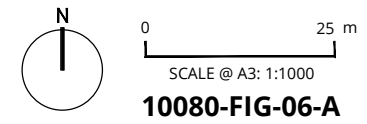
Photo ID: P16



Photo ID: P17



SITE PLAN
LOT 24 (No.42) KIRKHAM ROAD
MEELON



DRAWN:
DATE CREATED: 2025.08.18
PROJECTION: MGA50 GDA94
CADASTRE: LANDGATE
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