CLEARING REFERRAL

SUPPORTING DOCUMENTATION

Samphire Staff Accommodation, Bushfire Asset Protection Zone

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1 INTRODUCTION

1.1 Background

The Prendiville Group proposes to construct staff housing on Rottnest Island (Wadjemup) to support the sustainable operation of the Samphire Resort by providing 90 new accommodation units within a low-impact, modular design. The proposed staff housing will be constructed within the project footprint shown in Figure 1.

As part of detailed project design, Bushfire Prone Planning (BPP) (2026) identified the requirement for an asset protection zone (APZ) adjacent to the project footprint, as discussed further in Section 1.2. An APZ is an area of low fuel levels and managed vegetation adjacent to habitable or specified buildings and infrastructure to lessen the impact of an advancing bush fire.

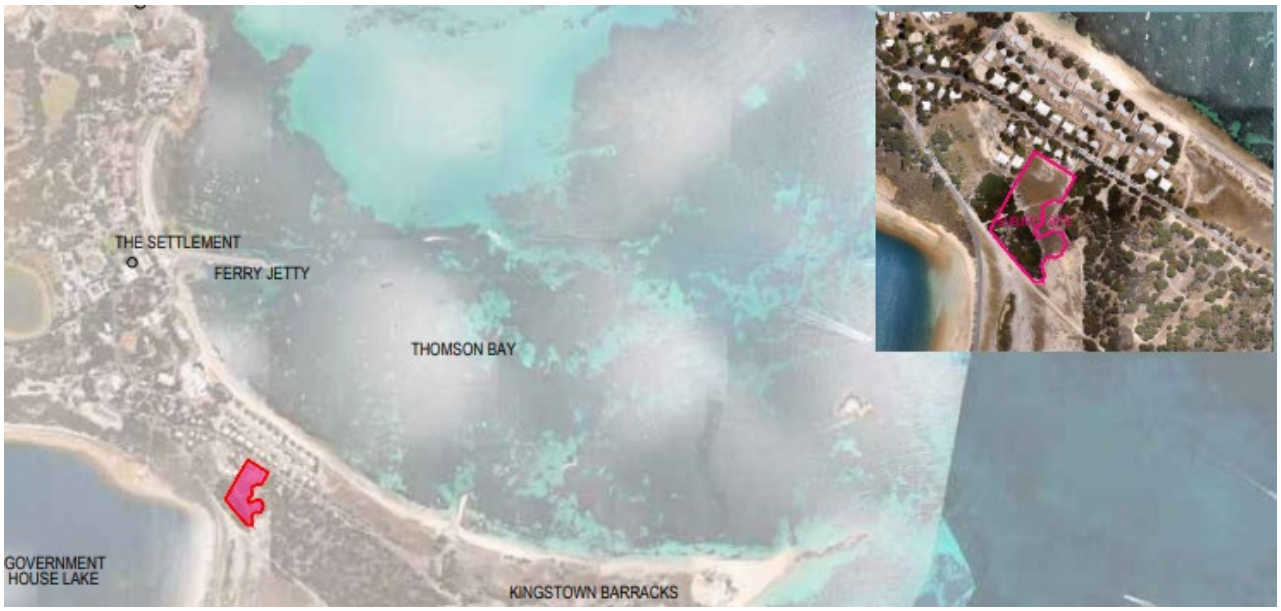


Figure 1: Samphire staff housing project footprint

1.2 Description of proposed clearing

1.2.1 Purpose of clearing

A Clearing Permit (CPS 9883/1) was approved on 6 December 2023 which encompasses the project footprint. The approved clearing area is shown in Figure 2.

In order to comply with the Planning for Bushfire Guidelines (WAPC 2024), the maintenance of some native vegetation within the APZ identified by BPP will be required. 0.19 hectares (ha) of the APZ is located outside the approved CPS 9883/1 clearing area (Figure 2). This clearing application addressed the proposed activities within the APZ.

Vegetation maintenance within the APZ will include:

- The under pruning of trees and shrubs proposed for retention, including the removal of dead branches. This vegetation has been proposed for retention. The proposed pruning or slashing of vegetation has not been included in this vegetation clearing application because it will not result in the death of the individual trees and shrubs being pruned
- Removal of dead vegetation and fallen dead material. The majority of dead material proposed for removal comprises debris and is no longer standing (see Plate 1). This material will be relocated for fauna habitat where possible. It is proposed that up to 0.098 ha of dead material is removed or relocated
- During the site assessment, BPP minimised the requirement for removal of native vegetation where possible. However, in order to comply with the Planning for Bushfire Guidelines (WAPC 2024), the removal of some vegetation was unavoidable. The majority of this vegetation is being removed as part

of the approved CPS 9883/1, however due to overhanging vegetation there are some overlaps with the APZ as shown in Figure 2. It is proposed that 0.003 ha of living native vegetation is removed within the APZ.

The removal of dead debris and living plants will result in the overall clearing of 0.1 ha of native vegetation within the APZ.

Figure 2: Clearing Permit (CPS 9883/1) area and APZ

RPS considers that a separate clearing application, rather than an amendment to the existing clearing permit, is required as:

- The purpose of the proposed clearing within the APZ differs to that of existing CPS 9883/1
- The proposed clearing within the APZ is not extensive and is limited to the removal of fallen dead material (0.098 ha), removal of 0.003 ha of living vegetation and pruning required to comply with relevant guidelines
- The impacts from the proposed clearing within the APZ differ to those within the CPS 9883/1, as summarised below:
  - Due to the retention of vegetation where possible, and relocation of dead material, impacts to fauna and fauna habitat are not considered of material consequence, with no fragmentation of habitat or ecological linkages
  - There is a threatened ecological community (TEC) mapped within the APZ, RPS considers that impacts to the TEC are not of material consequence as:
    - 44.39 ha of vegetation analogous with the TEC was recorded proximate to the APZ. Impacts to the TEC within the APZ comprises 0.2% of the TEC recorded by FVC (2025) proximate to the APZ.
    - Rottnest Island Authority (RIA) have advised that the current known extent of the TEC on the island is 79 ha. Impacts to the TEC within the APZ comprises 0.12% of the overall TEC across the island.

Plate 1: Example of dead vegetative material proposed for removal

1.2.2 Location of proposed clearing

BPP undertook an assessment within the APZ to clarify which vegetation requires clearing to comply with the below requirements, with variations to the below requirements implemented where possible (refer to Section4.2):

- Trees (greater than 6 metres (m) in height) will be separated from buildings/structures by a distance of at least 1.5 times the height of the tallest tree
- As a minimum, trunks at maturity should be at least 6 m from all elevations of the building, branches at maturity should not touch or overhang a building or powerlines
- Mature tree canopies should be separated at least 5 m with total canopy cover not exceeding 15% and not connected to tree canopy outside the APZ
- Species of trees that produce significant quantities of debris (fine fuels) during the bushfire season should be located a sufficient distance away from vulnerable exposed elements to ensure debris cannot drop and accumulate within at least 4 m of buildings/structures or be likely to be relocated by wind to closer than 4 m to buildings / structures
- Shrubs and scrub (0.5 to 6 m in height) should not be located under trees or within 3 m of buildings
- Clumps of shrubs should be separated from each other and any exposed window or door by at least 10 m (unless they can be classified as low flammability plants).

The extent of clearing within the APZ is limited to up to 0.1 ha as shown in Figure 3 and summarised in Table 1.

As shown in Figure 3, much of the proposed vegetation removal within the APZ is associated with the already approved vegetation clearing along the boundary of the CPS 9883/1.

Figure 3: Proposed clearing area and vegetation maintenance areas

Table 1: Summary of vegetation maintenance proposed within the APZ

Activity	Area (ha)
Vegetation removal	• The removal or relocation of 0.098 ha of dead material and debris • Clearing 0.003 ha of living native vegetation.
Vegetation retention	Retention of 0.09 ha of native vegetation. Pruning of the retained 0.09 ha of native vegetation is proposed. This activity has not been included in the clearing application as pruning does not comprise the clearing of native vegetation.

1.2.3 Clearing methods and timing

Removal / relocation of dead material and clearing of living native vegetation within the APZ will be undertaken by hand and under the guidance of [redacted] Bushfire Prone Planning Director, to ensure vegetation maintenance is in accordance with the requirements of Planning for Bushfire Guidelines (WAPC 2024), and that any pruning is undertaken in a manner that will not impact the health of vegetation.

The removal / relocation of dead material and clearing of living native vegetation is proposed to be undertaken over a three-week period between 01 March 2026 and 01 August 2026.

1.3 Proponent details

Rottnest Island Authority is the proponent for the proposed clearing, as summarised below.

Name: Rottnest Island Authority
Postal address: PO Box 693, Fremantle WA 6959
ABN: 38836160172

[redacted]

1.4 Supporting technical reports

1.4.1 Flora and vegetation

Two flora and vegetation surveys have been undertaken over the APZ as summarised below:

- Parker Point Road, Rottnest; Native Vegetation Clearing Permit: Supporting Documentation (360 Environmental 2022). The survey area is shown in Figure 4
- Flora and vegetation survey; South Thomson and Kingstown, Rottnest Island (Wadjemup) (Focused Vision Consulting (FVC) 2023). The survey area is shown in Figure 5.

Data from these reports has been used to support this clearing application. RPS undertook a site visit to ground truth the vegetation within the APZ and assess the adequacy of these surveys. Amendments to the vegetation mapping previously undertaken have been made based on the site visit, as discussed in Section 3.4.

Figure 4: 360 Environmental survey area

Figure 5: FVC survey area

1.4.2 Bushfire assessment

BPP undertook a comprehensive assessment of the APZ in December 2025 to clarify the areas requiring maintenance and vegetation removal. This assessment allowed for the retention of vegetation to be maximised, while ensuring the safety of adjacent buildings and infrastructure from fire is provided for in accordance with Planning for Bushfire Guidelines (WAPC 2024).

A summary of the assessment is provided in Appendix A.

2 STAKEHOLDER ENGAGEMENT

Initial liaison with the Department of Water and Environmental Regulation (DWER) indicated that, as the APZ is located within an Environmentally Sensitive Area (ESA), the only exemption which may apply to clearing within the APZ was Schedule 6 clause 10: Clearing that is done —to comply with a notice given under section 33(1) of the *Bush Fires Act 1954*. This exemption enables clearing to be conducted to comply with a bush fire notice from the Local Government Authority (Refer to correspondence provided in Appendix B).

Subsequent liaison with the RIA and DWER confirmed that, as RIA do not have the authority to issue a bushfire notice, then no exemptions are applicable to clearing within the APZ and a clearing application is required.

3 EXISTING ENVIRONMENT

3.1 Interim Biogeographic Regionalisation of Australia

The Interim Biogeographic Regionalisation for Australia (IBRA) divides Australia into bioregions based on major biological and geographical/geological attributes. The APZ lies within the Perth (SWA02) subregion of the Swan Coastal Plain bioregion.

The Perth subregion is composed of colluvial and aeolian sands, alluvial river flats and coastal limestone. Mitchell et al. (2002) described the vegetation as heath and/or Tuart woodlands on limestone, Banksia and Jarrah-Banksia woodlands on Quaternary marine dunes of various ages and Marri on colluvials and alluvials (Mitchell, 2002).

3.2 Topography

The topography of the APZ is relatively flat at approximately 5 m Australian Height Datum (AHD) (Figure 6). The topography is similar to that of the CPS 9883/1 area, which ranges from 7 m AHD in the southwest to 5 m AHD in the northeast (360 Environmental 2022).

Figure 6: Topography

3.3 Soil landscape mapping

Soil landscapes and land system mapping of Western Australia describes the broad soil and landscape characteristics from regional to local scales. The APZ comprises the Quindalup South System (211Qu) which comprises coastal dunes of the Swan Coastal Plain, with calcareous deep sands and yellow sands. Coastal scrub (Figure 7).

Figure 7: Soil landscape mapping

3.4 Vegetation and flora

3.4.1 Vegetation complex

The vegetation complex within the APZ has been defined by Heddle et al. (1980) as the Quindalup Complex. This complex is described as coastal dune consisting of two alliances: the strand and fore-dune alliance and the mobile and stable dune alliance. Local variations include the low, closed forest of *Melaleuca lanceolata* (Rottnest teatree) – *Callitris preissii* (Rottnest Island pine), the closed scrub of *Acacia rostellifera* (summer-scented wattle) and the low, closed *Agonis flexuosa* (peppermint) forest of Geographe Bay (FVC, 2023).

The pre-European extent and current known extent of this complex is summarised in Table 2. In the absence of specific data for Rottnest Island (Wadjemup), information relevant to the Swan Coastal Plain and the City of Cockburn, as the island falls within the district of the City of Cockburn.

Table 2: Regional extent of the Quindalup Complex

Region	Pre-European extent	Current extent	Pre-European extent remaining
Swan Coastal Plain	54,573.87 ha	33,011.64 ha	60.49%
City of Cockburn	1,021.62 ha	728.23 ha	71.28%

Source: FVC 2023

The Commonwealth's National Targets and Objectives for Biodiversity Conservation (Environment Australia 2001) recognises that the retention of 30%, or more, of the preclearing extent of each ecological community is necessary if Australia's biological diversity is to be protected. The EPA uses vegetation complexes as the basis for regional representation of biodiversity and has an objective to seek to retain at least 30% of the pre-clearing extent of each vegetation community (EPA 2015).

The remaining extent for the Heddle et al. (1980) Quindalup Complex exceeds the 30% threshold for the Swan Coastal Plain IBRA region and City of Cockburn extents (Table 2).

Figure 8: Vegetation complex

3.4.2 Vegetation types

Two vegetation types were originally recorded within the APZ by FVC (2023), as described below.

- *Callitris preissii* and *Melaleuca lanceolata* tall shrubland (CpMl)
- *Olearia axillaris* tall sparse shrubland over *Acanthocarpus preissii* low open shrubland (OaAp).

The site assessment undertaken by RPS identified these vegetation types within the APZ, however recorded a difference in the mapping of the vegetation type boundaries. RPS considers the reason for the changes in vegetation boundaries to potentially include:

- Large areas of dead and fallen *Melaleuca lanceolata* and *Callitris preissii* over the previously mapped OaAp may have resulted in the shading and subsequent death of this vegetation type
- Interpretation of aerial photography previously undertaken by 360 Environmental and FVC may have misinterpreted the dead areas as the low lying OaAp vegetation type.

The mapping and areas of vegetation types CpMl and OaAp recorded by RPS within the APZ are described in Table 3 and shown in Figure 9.

Table 3: Vegetation types within the APZ

Vegetation unit code	Description	Area within the APZ	Photograph
CpMl	*Callitris preissii* and *Melaleuca lanceolata* tall shrubland.	0.18 ha *(previously mapped as 0.1 ha by FVC)*	
OaAp	*Olearia axillaris* tall sparse shrubland over *Acanthocarpus preissii* low open shrubland.	0.01 *(previously mapped as 0.07 ha by FVC)*	
Total		**0.19 ha**	

Figure 9: Vegetation types within the APZ

3.4.3 Vegetation condition

Vegetation condition within the APZ was recorded by both 360 Environmental (2022) and FCV (2023) as ranging from Very Good to Completely Degraded. Due to the large amounts of dead and fallen vegetation, the original boundaries of mapped vegetation condition have been amended.

RPS assessed the vegetation within the APZ as ranging from Good to Degraded as shown in Figure 10.

Figure 10: Vegetation condition within the APZ

3.4.4 Ecological communities

FVC (2023) determined that the vegetation type CpMl is analogous with the Threatened Ecological Community (TEC) *Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands of the Swan Coastal Plain (floristic community type 30a as originally described by Gibson et. al. 1994). This TEC is listed as Critically Endangered under the state *Biodiversity Conservation Act 2016* (BC Act) but is not listed under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

RPS undertook a site visit and review of the vegetation to confirm the presence of this TEC. The TEC assessment is provided below.

3.4.4.1 Habitat for the threatened ecological community

The TEC occurs on calcareous sandy soils of the Quindalup Dunes near the coast. Flora species that occur in the community are typically associated with these calcareous sandy soils and include *Callitris preissii, Melaleuca lanceolata, Spyridium globulosum, Acanthocarpus preissii* and *Rhagodia baccata* (Department of Parks and Wildlife, 2014).

The critical habitat for this TEC comprises (Department of Parks and Wildlife, 2014):

- Sandy soils on which the community occurs
- Fresh superficial groundwater
- Occurrences with comparatively large intact areas of the community that are in relatively good condition are considered important occurrences.

Vegetation on Rottnest Island (Wadjemup) has suffered quite high levels of modification as a consequence of inappropriate fire regimes and clearing. Prior to European impacts, it is considered that the vegetation composition of the TEC on Rottnest Island (Wadjemup), would have been more similar to other areas such

as Garden Island. Therefore, the Rottnest examples of the TEC that naturally contains *Callitris preissii* in appropriate habitat are considered to represent types and sub-types of the *Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands (Department of Parks and Wildlife, 2014).

3.4.4.2 Presence of the threatened ecological community within the APZ

RPS' assessment of the APZ confirmed the presence of the following key overstorey species within the APZ:

- *Melaleuca lanceolata*
- *Callitris preissii*
- *Agonis flexuosa*
- *Eucalyptus utilis*
- *Acacia rostellifera.*

No understorey species were present within the APZ, as shown in Plate 2.

Plate 2: Lack of understorey within woodland vegetation type

The interim recovery plan (DBCA, 2014) states that “Where vegetation is in poor condition it is not feasible to use quadrat data and statistical techniques to clarify the floristic community type present. *Callitris preissii* is considered, however, to be a definitive indicator of the *Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands when it is present in appropriate vegetation and coastal habitat on the southern Swan Coastal Plain”. Due to the lack of flora diversity and vegetation condition within the APZ, the use of quadrat data to confirm the presence of the TEC was not considered suitable. An assessment for the presence of the TEC within the APZ is provided below.

Melaleuca lanceolata and *Callitris preissii*, which were recorded within the APZ, are the key indicator species for this TEC.

An assemblage of the TEC is known to occur on Bald Island which contains *Agonis flexuosa, Melaleuca lanceolata, Eucalyptus conferruminata, Trymalium floribundum* and *Chorilaena quercifolia*, and a suite of herbs that are quite different to those that occur in occurrences of the TEC on the Swan Coastal Plain. As *Agonis flexuosa* is known to occur within the Bald Island occurrences of this TEC, RPS considers that the presence of *Agonis flexuosa* within the APZ does not preclude this vegetation type from being analogous with the TEC.

The Recovery Plan identifies that the *Callitris preissii* assemblages on Rottnest Island (Wadjemup) have been historically impacted, however are still considered to comprise the TEC. As such, the reduced condition identified in some areas of the APZ has not impacted the mapping of the TEC.

Based on this assessment, RPS considers that FVCs assessment that the TEC is present within the APZ is correct.

44.39 ha of this vegetation unit was recorded within the larger FVC survey area, of which 0.18 ha (or 0.2% of the vegetation unit recorded by FVC) is located within the APZ.

3.4.5 Conservation significant flora

No conservation significant taxa were recorded within the APZ (FVC 2023, 360 Environmental 2022).

3.4.6 Environmentally Sensitive Areas

Environmentally Sensitive Areas are prescribed under the Environmental Protection (Clearing of Native Vegetation) Regulations 2004 and have been identified to protect native vegetation values of areas surrounding significant, threatened or scheduled flora, vegetation communities or ecosystems. ESAs are declared by the Minister for Environment under Section 51B of the EP Act. The following areas are declared to be ESAs:

- Declared World heritage property as defined in section 13 of the EPBC Act
- Area that is included on the Register of the National Estate, because of its natural heritage value, under the *Australian Heritage Council Act 2003*
- Defined wetland and the area within 50 m of the wetland. Defined wetlands include Ramsar wetlands
- Conservation Category Wetlands and nationally important wetlands
- Area covered by vegetation within 50 m of rare flora, to the extent to which the vegetation is continuous with the vegetation in which the rare flora is located
- Area covered by a TEC
- Bush Forever site listed in Bush Forever policy.

The entirety of the APZ is located within the buffered extents of ESAs, ESAs mapped over the APZ are associated with:

- the TEC *Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands of the Swan Coastal Plain (floristic community type 30a as originally described by Gibson et. al. 1994), as shown in Figure 11, and
- Government House Lake which is part of the Rottnest Island Lakes (WA089) which is listed under the Directory of Important Wetlands in Australia.

Figure 11: Environmentally sensitive areas (buffered)

3.5 Inland water

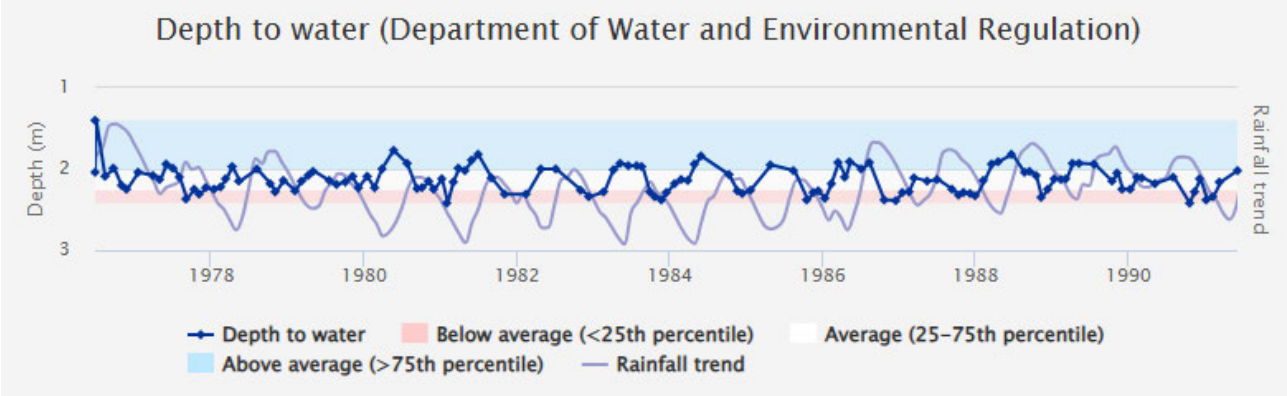
3.5.1 Hydrology and surface water

There are no surface water features within the APZ. However, the APZ is located adjacent to the mapped boundary of Government House Lake which is part of the Rottnest Island Lakes (WA089) which is listed under the Directory of Important Wetlands in Australia. The APZ (at its nearest point) and Government House Lake are separated by Brand Way, a historical railway track and minor vegetation (Figure 12).

Figure 12: Surface water

3.5.2 Groundwater

The depth to groundwater table on Rottnest Island (Wadjemup) is typically less than 20 m (Bureau of Meteorology 2025). However, a review of the closest DWER monitoring bore (1.2 kilometres (km) south-west of the APZ) (Bore ID: 61619141) with sufficient monitoring data indicates that groundwater depth is between 1 m to 3 m below ground level (Graph 1).



Graph 1: Depth to groundwater chart for DWER bore located 1.2 km to the south-west

Groundwater occurs in the Tamala Limestone forming a shallow, unconfined aquifer at Rottnest Island (Wadjemup). The aquifer is recharged by direct rainfall to form a thin freshwater lens resting on saline water with a mixing zone (RIA 2014). From the centre of the catchment, flow is assumed to travel radially to the perimeter of the island and discharge into the ocean and saline lakes to the east. However, 360 Environmental (2022) also identified groundwater flows would, in part, be directed towards Government House Lake.

Groundwater salinity at the APZ is unknown, however, groundwater bores located approximately 3.5 km west of the APZ have salinity levels ranging between fresh and brackish (FVC 2023).

3.6 Terrestrial fauna

A desktop assessment and likelihood of occurrence assessment has been undertaken to identify conservation significant fauna species potentially occurring within the APZ (Table 4). As the APZ does not comprise marine or wetland habitats, fauna species requiring these specific habitat types have been excluded from the assessment.

Although there is potential for conservation significant fauna species to occur within the APZ, fauna habitat within the APZ is well represented elsewhere on the island and any vegetation clearing within the APZ will not materially reduce the area of habitat available to these species.

Eco Logical (2024) undertook a basic terrestrial fauna survey approximately 750 m to the east of the APZ in comparable habitat. A total of 14 native vertebrate fauna species were recorded within the survey area. No introduced (feral) fauna species were recorded within the survey area. One conservation significant species, the Quokka (*Setonix brachyurus*) was recorded within the survey area.

The Eco Logical (2024) likelihood of occurrence assessment supports the conservation significant species listed below as Potentially occurring due to availability of potentially suitable habitat and location of nearby recent records.

Table 4: Conservation significant fauna species with the potential to occur within the APZ

Species	Conservation status		Habitat	Likelihood assessment
	EPBC Act	BC Act / DBCA		
Setonix brachyurus (Quokka)	Vulnerable	Vulnerable	The quokka prefers dense understorey, less than ten years since fire, adjacent vegetation age that is greater than 25 years and the absence of feral predators. The understorey structure of the habitats currently inhabited by the quokka consist of dense, low vegetation that provides refuge from predation. These covered/shady microhabitats may also be important during the hotter months, particularly on Rottnest Island (Wadjemup), where animals converge in dense thickets of *Gahnia* spp. and *Acanthocarpus* spp.	**Present** Suitable habitat is present within the APZ and the Quokka is widespread across the island, occurring in most habitat types. RPS recorded this species within the APZ during a site visit.
Pandion haliaetus (Eastern osprey)	-	Vulnerable	The Eastern osprey occurs in littoral and coastal habitats and terrestrial wetlands of tropical and temperate Australia and offshore islands. They are mostly found in coastal areas but occasionally travel inland along major rivers, particularly in northern Australia. They require extensive areas of open fresh, brackish or saline water for foraging.	**Unlikely** Marginal habitat for this species is present within the APZ, however there are no tall trees suitable perching. The species is highly mobile and may utilise the APZ as a transient visitor.
Tiliqua rugosa konowi (Rottnest Island bobtail)	-	Vulnerable	Rottnest Island bobtails are common around limestone rocks and prefer limestone heath, woodland, and coastal habitats.	**Likely** Suitable habitat is present within the APZ.
Lerista lineata (Perth slider)	-	Priority 3	The species was recorded in *Acacia rostellifera* scrub on Rottnest Island (Wadjemup) in 2016. Occurs in white sand.	**Likely** Suitable habitat is present within the APZ.
Pseudonaja affinis exilis (Rottnest Island dugite)	-	Priority 4	Dugites live in abandoned burrows or hollow logs and prefer coastal habitat, limestone heath, woodland, and the Settlement areas of the island.	**Likely** Suitable habitat is present within the APZ.

3.6.1 Ecological linkages

No formal ecological linkages have been identified within the APZ. Due to the approved clearing to the south east (CPS 9883/1), development to the north and road to the west, the APZ is not considered to comprise part of an ecological linkage.

Vegetation to the west of Brand Way comprises vegetation forming a local ecological linkage, connecting Government House Lake, Pearse Lake and Herschel Lake (Figure 13). Although separated from this linkage by Brand Way, there may be some movement between the vegetation within the APZ and this linkage.

Figure 13: Local ecological linkage

3.7 Terrestrial environmental quality

3.7.1 Acid Sulfate Soils

Acid sulfate soils (ASS) are naturally occurring soils containing iron sulfide minerals formed under saturated anoxic conditions. In an undisturbed state below the water table, these soils are benign and non-acidic. However, if the soils are exposed to the atmosphere through activities such as drainage, excavation or dewatering, the sulfides may react with oxygen to form sulfuric acid.

A review of DWER's ASS mapping indicates that the APZ is not at risk of ASS occurring within 3 m of the natural soil surface or deeper (Figure 14). An area of moderate to low risk of ASS occurring within 3 m of the natural soil surface is mapped <100 m south of the APZ (Figure 14). The ASS risk is associated with wetlands, however as the site is underlain with calcareous sands (refer Section 3.3), there is no risk of ASS at the site.

Figure 14: Acid sulfate soils risk mapping

3.7.2 Contaminated sites

A review of the DWER Contaminated Sites Database did not identify and registered contaminated sites which may impact the APZ (Figure 15). The database only lists sites that have been classified as either ‘contaminated – remediation required’, ‘contaminated restricted use’ or ‘remediated for restricted use’.

One registered contaminated site is located within 2 km of the APZ (Figure 15). The information pertaining to the classification of this site is provided Table 5. The Basic Summary of Records associated with this parcel of land has been provided in Appendix C. The registered contaminated site will have no impact on the APZ due to the significant separation distance and associated natural attenuation.

Figure 15: Contaminated sites mapping

Table 5: Registered contaminated sites proximate to the APZ

ID no.	Lot no.	Direction and distance from APZ	Classification	Nature and extent of contamination
39676	That portion of Lot 10976 on Deposited Plan 216860 known as Subject A on Deposited Plan 72329	0.50 km north west of the APZ.	Remediated for restricted use.	Hydrocarbons (such as from petrol or diesel) are present in groundwater beneath the site.

A review of the historic aerial imagery indicates that land adjacent to the APZ is currently used as a laydown area for various construction materials, with soil disturbance occurring to construct a road. Whilst imagery does not show evidence of structures formerly being present on the site with no apparent development, there is evidence of soil disturbance potentially associated with a former structure or construction of the surrounding buildings. With a data gap in the imagery between 1955 and 2000, it cannot be confirmed whether potentially contaminating activities occurred. Should a former structure(s) have been present, the underlying soil may be potentially impacted with hazardous materials (such as asbestos) as a result of poor historic demolition practices. However, it is unlikely that these would have migrated into the APZ.

3.8 Social surroundings

3.8.1 Aboriginal heritage and culture

A search of the Department of Planning, Lands and Heritage's (DPLH) Aboriginal Cultural Heritage Inquiry System did not identify any Registered or Lodged Aboriginal cultural heritage (ACH) sites within the APZ. There are several Historic, Registered and Lodged Aboriginal cultural heritage sites immediately proximate to the APZ which have been spatially mapped in Figure 16.

Figure 16: Aboriginal cultural heritage mapping

The entirety of Rottnest Island (Wadjemup) (including the APZ) is a Historic Aboriginal cultural heritage site (ID no. 20862). Historic Aboriginal heritage sites are places assessed as not meeting the criteria of Section 5 of the *Aboriginal Heritage Act 1972* and includes places that no longer exist as a result of land use activities with existing approvals.

3.8.2 Historic heritage

A search of the Heritage Council's inHerit database did not identify any heritage places within (or adjacent to) the APZ that would be impacted by the proposed vegetation maintenance. The closest historic heritage place to the APZ is Heritage Place number 516 (Thompson Bay Settlement, Wadjemup / Rottnest Island), located approximately 0.20 km north-west of the APZ (Figure 17).

3.8.3 Bushfire

A search of the Department of Fire and Emergency Services' Map of Bushfire Prone Area identified that the APZ falls within a Bushfire Prone Area (Figure 18).

Figure 17: European heritage mapping

Figure 18: Bushfire prone areas mapping

4 IMPACT ASSESSMENT

4.1 Summary of proposed clearing

Vegetation maintenance is required within the APZ shown in Figure 2 to protect adjacent workers accommodation and infrastructure from potential bush fire. Of the 0.19 ha APZ, 0.1 ha is proposed to be cleared or managed as summarised below:

- The removal or relocation of 0.098 ha of dead material and debris
- Clearing 0.003 ha of living native vegetation.

Of the 0.09 ha of retained vegetation, some pruning will be required to ensure compliance with the Planning for Bushfire Guidelines (WAPC 2024). This activity has not been included in the application as it will not result in the death of vegetation.

4.2 Avoidance and mitigation measures

BPP undertook a site assessment to identify areas of vegetation and dead material requiring removal within the APZ and those areas of native vegetation that could be retained and managed. BPP identified that 0.09 ha of native vegetation (47% of the overall APZ) could be retained and managed (i.e. through pruning). The key mitigation and avoidance measures implemented by BPP to achieve acceptable bushfire risk outcomes while protecting environmental values are summarised below. BPP's justification for variation from the 2024 Planning for Bushfire Guidelines is provided in Table 6.

- Variation from the generic guideline requirement for a minimum 3 m vegetation separation distance. This was achieved through a detailed site-specific assessment of bushfire hazards, fuel characteristics, vegetation structure, asset vulnerability and ongoing land management practices. Variation from this setback requirement minimised the potential clearing of 0.01 ha within the 3 m separation buffer
- Implementation of performance based fuel management, including pruning, instead of full vegetation clearance of the APZ.

BPP states that the proposed variation from the prescriptive vegetation separation distances is a defensible, outcomes-based solution consistent with the 2024 Planning for Bushfire Guidelines and SPP 3.7 – Bushfire. The approach achieves acceptable bushfire risk outcomes while protecting the significant environmental values of the island.

Table 6: justification for variation from 2024 Planning for Bushfire Guidelines

Relevant guideline or policy	Solution / intent	Site constraint / issue	Proposed variation	Justification / performance outcome
SPP 3.7 – Bushfire Policy Framework.	Development to manage bushfire risk while balancing environmental outcomes.	Site located on Rottnest Island, a Class A Reserve with high conservation value.	Retention of native vegetation within prescribed distances.	Variation aligns with SPP 3.7 objectives, particularly Objective 5.4, which prioritises retention of native vegetation where bushfire risk can be acceptably manage.
SPP 3.7 – Policy Objective 5.4.	Retain native vegetation while managing bushfire risk.	Strict vegetation clearance would result in unnecessary environmental impact.	Performance-based fuel management instead of full clearance.	Native vegetation retained due to environmental sensitivity, with bushfire risk mitigated through targeted fuel reduction measures.
Planning for Bushfire Guidelines (2024) – Outcomes-Based Approach.	Acceptable solutions may be replaced with outcomes-based solutions where outcomes are met.	Prescriptive separation distances not fully achievable without environmental harm.	Outcomes-based solution applied.	Equivalent bushfire risk outcome achieved through professional judgement, site-specific mitigation and ongoing management.
Guidelines – Bushfire Protection Criteria	Vegetation separation distances applied to reduce flame	Vegetation present within 3 m of buildings.	Vegetation retained within 3 m with	Intent of separation distance achieved through fuel structure

(Vegetation Management).	contact and radiant heat.		enhanced management.	modification rather than full removal.
Guidelines – Fuel Management Principles.	Reduce fuel loads and vertical fuel continuity.	Environmental constraints limit extent of vegetation removal.	Under-pruning and fuel reduction measures implemented.	Vegetation under pruned to 2.5 m, standard requirement is under prune to 2m, ladder fuels removed, and fine fuels managed to reduce flame height and ember generation.
Guidelines – Risk- Based Assessment.	Bushfire risk assessed considering likelihood and consequence.	Unique island context with managed vegetation and controls.	Risk managed through mitigation rather than clearance.	Reduced likelihood of flame contact and ember accumulation results in low residual risk to assets.
Guidelines – BMP Preparation and Professional Input.	BMP to be informed by suitably qualified practitioner.	Site requires expert judgement due to constraints.	BPAD Level 3 practitioner assessment.	Variation supported by professional bushfire planning judgement and experience in performance-based design.
Guidelines – Ongoing Management and Maintenance.	Bushfire mitigation measures must be maintained over time.	Risk could increase without active management.	Formalised ongoing vegetation maintenance regime.	Dead material, loose bark and fine fuels removed regularly; no combustible materials permitted in understorey.
Guidelines – Consequential Fire Consideration.	Prevent fire spread from vegetation to buildings.	Reduced separation distance could increase risk if unmanaged.	Structural and fuel controls mitigate spread.	Absence of fuel continuity, managed vegetation structure and maintenance reduce likelihood of consequential fire impacting buildings.

Source: BPP 2026

4.3 Assessment against the 10 clearing principles

Table 7 provides and assessment of the proposed clearing against the 10 clearing principles as outlined in Schedule 5 of the *Environmental Protection Act 1986* to determine whether the proposed clearing is at variance to the principles.

Table 7 Assessment of the proposed clearing against the 10 clearing principles

Principle	Assessment	Outcome
Principle (a) – native vegetation should not be cleared if it comprises a high level of biological diversity.	During the site visit undertaken by RPS, only five species (*Melaleuca lanceolata*, *Callitris preissii*, *Agonis flexuosa*, *Eucalyptus utilis* and *Acacia rostellifera*) were recorded in the upper strata of the woodland community CpMl, with no understorey recorded. Native vegetation within the APZ does not comprise a high level of biological diversity.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.
Principle (b) – Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of a significant habitat for, fauna indigenous to Western Australia.	During a site visit undertaken by RPS, the Quokka (*Setonix brachyurus*) was recorded within the APZ. Although a desktop assessment did not identify any conservation significant fauna species having been previously recorded within the APZ, based on the site visit undertaken by RPS and the fauna assessment undertaken proximate to the APZ by Eco Logical (2024), there is also potential for the Rottnest Island dugite (*Pseudonaja affinis exilis*), Perth slider (*Lerista lineata*) and Rottnest Island bobtail (*Tiliqua rugosa konowi*) to occur within the APZ. These species are known to occur in coastal, heath and woodland habitats. As these habitat types are widespread across Rottnest Island (Wadjemup), clearing up to 0.1 ha of native vegetation is unlikely to materially impact these species. Particularly as 0.09 ha (47% of the APZ) of native vegetation is being retained within the APZ. Vegetation maintenance within the APZ was designed to minimise clearing where possible. As such, no large areas of vegetation are proposed to be cleared which would result in the fragmentation of fauna habitat. Retention of patches of native vegetation allows for the continued movement of fauna through the APZ. Although the APZ does not form part of an ecological linkage (see Section 3.6.1), there may be some fauna movement between the APZ and vegetation to the west, across Brand Way. Due to the retention of stands of vegetation within the APZ, the proposed maintenance will not impact this fauna movement.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.
Principle (c) Native vegetation should not be cleared if it includes or is necessary for the continued existence of rare flora.	No conservation significant taxa were recorded within the APZ (FVC 2023, 360 Environmental 2022). Vegetation clearing and maintenance within the APZ will not impact native vegetation necessary for the continued existence of rare flora.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.
Principle (d) – Native vegetation should not be cleared if it comprises the whole or part of, or is necessary for the maintenance of, a Threatened Ecological Community (TEC).	0.18 ha of the TEC *Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands of the Swan Coastal Plain (floristic community type 30a as originally described by Gibson et. al. 1994) was recorded within the APZ. Vegetation removal and maintenance within this TEC includes: • The relocation or removal of dead debris and vegetation (0.098 ha of the mapped TEC). The majority of this has been mapped as Degraded condition • Clearing 0.003 ha of living native vegetation comprising the TEC • The retention of 0.09 ha of vegetation comprising the TEC. Maintenance of this vegetation will include pruning to ensure compliance with bushfire guidelines. Overall, the proposed maintenance within the TEC will result in the removal of 0.1 ha of vegetation.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.

Principle	Assessment	Outcome
	44.39 ha vegetation analogous with the TEC was recorded within the larger FVC survey area. Removal of 0.1 ha of TEC within the APZ comprises 0.2% of the TEC recorded by FVC. RIA have advised that the current known extent of the TEC on the island is 79 ha. Impacts to the TEC within the APZ comprises 0.12% of the overall TEC across the island. Consequently, RPS considers that vegetation maintenance within the APZ will not result in the removal of vegetation necessary for the maintenance of a TEC, particularly since 0.09 ha of the TEC will be retained within the APZ.	
Principle (e) – Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.	The Commonwealth's National Targets and Objectives for Biodiversity Conservation (Environment Australia 2001) recognises that the retention of 30%, or more, of the preclearing extent of each ecological community is necessary if Australia's biological diversity is to be protected. The EPA uses vegetation complexes as the basis for regional representation of biodiversity and has an objective to seek to retain at least 30% of the pre-clearing extent of each vegetation community (EPA 2015). The APZ contains one mapped vegetation complex; Quindalup (Heddle et al. 1980) which exceeds the 30% threshold for the Swan Coastal Plain IBRA region and City of Cockburn extents (Table 2). Historical aerial imagery (Landgate 2025) shows clearing within the APZ prior to 1955. Revegetation of the island has occurred since 1963, however, due to fire regimes and intense grazing from Quokkas, natural regeneration is low (360 Environmental 2022). Native vegetation within the APZ does not comprise a remnant of native vegetation in an area that has been extensively cleared.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.
Principle (f) – Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.	There are no wetlands or riparian vegetation present within the APZ The APZ is approximately 100 m north-east of Government Lake (WA089), which is part of the Rottnest Island Lakes listed under the Directory of Nationally Important Wetlands (DBCA 2025). The APZ is separated from this wetland by Brand Way, a historical railway track and vegetation. The vegetation within the APZ is not riparian vegetation nor is it growing in or associated with Government Lake.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.
Principle (g) – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	Land degradation may include the clearing of vegetation, decline in vegetation condition (including spread of weeds, *Phytophthora* dieback), soil erosion and soil acidity (caused by wind and water erosion due to vegetation clearing), salinity or waterlogging / flooding. The proposed vegetation maintenance within the APZ will include clearing of up to 0.1 ha of vegetation. No other activities within the APZ are likely to cause appreciable land degradation, as summarised below: • The retention of 0.09 ha of vegetation will minimise the risk of soil erosion • Implementation of a Construction Environmental Management Plan (CEMP) would reduce the risk of spread or introduction of weeds, *Phytophthora* dieback and / or erosion within the APZ. Measures outlined in the CEMP will also ensure that vehicles, equipment and machinery will be clean and free of vegetation / soil prior to being mobilised.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.
Principle (h) – Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact	The APZ is mapped within the buffered area of an ESA (Figure 11). The ESA associated with the TEC encompasses the APZ. As discussed under Principle (d), RPS considers that vegetation maintenance within the APZ will not result in the removal of vegetation	Clearing of vegetation within the proposed APZ is

Principle	Assessment	Outcome
on the environmental values of any adjacent or nearby conservation areas.	necessary for the maintenance of a TEC, as 0.09 ha of the TEC will be retained within the APZ and impacts to the TEC only comprise 0.2% of the TEC recorded by FVC. The ESA associated with Government House Lake, incorporates the wetland itself, the proximate vegetation and a 50 m buffer. The APZ is separated by approximately 100 m of mostly vegetated land and Brand Way, at its closest point. This land acts as a buffer between the APZ and the mapped ESA; therefore, it is unlikely there will be impacts to the values associated with the wetland. The proposed vegetation maintenance within the APZ will be limited to within the boundaries of the APZ. It is not likely that the clearing would have an impact on the conservation value of nearby conservation areas through the spread of weeds or dieback. Measures (e.g. CEMP) will be implemented to reduce the risk of spread or introduction of weeds, Dieback (*Phytophthora cinnamomi)* and / or erosion. These procedures will also ensure that vehicles, equipment and machinery will be clean and free of soil prior to being mobilised, particularly during clearing and construction activities. The proposed activities within the APZ will not impact on the environmental values of any adjacent or nearby conservation areas.	not considered to be at variance with this Principle.
Principle (i) – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.	The APZ is not mapped within a Public Drinking Water Source Area (PDWSA). Although no groundwater investigations have been conducted it is assumed that a shallow unconfined aquifer lies beneath the APZ and that groundwater will flow in part toward Thomson's Bay and in part toward Government House Lake, to the southwest (360 Environmental 2022). The proposed activities within the APZ will not result in any impacts to groundwater levels or quality as summarised below: • Implementation of a CEMP would reduce the risk of spills during activities within the APZ • No hardstand is proposed that would change infiltration rates. As the majority of living native vegetation will be retained (0.09 ha), groundwater uptake by native vegetation is unlikely to significantly change. No surface water features are present within the APZ, with the nearest water feature, Government House Lake, located approximately 100 m from the APZ. Government House Lake is part of the Rottnest Island Lakes listed under the Directory of Important Wetlands (DBCA 2025). It is not expected that the maintenance and clearing of up to 0.1 ha of vegetation would impact the surface water quality of Government House Lake.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.
Principle (j) – Native vegetation should not be cleared if the clearing of the vegetation is likely to cause, or exacerbate, the incidence of flooding.	Rottnest Island (Wadjemup) receives a mean rainfall of 564.6 millimetres (mm) per annum, with the local climate consisting of cool wet winters and warm dry summers. Maximum mean rainfall occurs in July, with 111.5 mm. Flooding is unlikely to be an issue as the soil is sandy and porous. As the current land uses are not proposed to change, no hard stand is proposed and 0.09 ha of native vegetation is proposed for retention, the risk for flooding is unlikely to change due to the proposed activities within the APZ.	Clearing of vegetation within the proposed APZ is not considered to be at variance with this Principle.

4.4 Consideration of suitability for clearing referral

An assessment of the proposed vegetation has been undertaken against the clearing activities suitable for the referral process, as outlined in the Native vegetation clearing referrals guideline (DWER 2021) (Table 8).

Assessment against the referral requirements and criteria indicates that the proposed vegetation maintenance is suitable for assessment under the clearing referral process. Furthermore, due to the fact that the proposed activities comprise mainly the clearing of dead debris, it is not considered a significant environmental impact. A review of similar referrals supports this conclusion (e.g. referrals REF 11180/1 and REF 11117/1).

Table 8 Assessment of the proposed vegetation maintenance against the referral criteria

Requirement	Assessment	Outcome
Clearing is not likely to be completed within two years	The removal / relocation of dead material and clearing of living native vegetation is proposed to be undertaken over a three-week period between 01 March 2026 and 01 August 2026.	Not at variance to this criteria. It is proposed that vegetation maintenance is undertaken over a three week period and will not exceed the 2 year threshold.
Clearing will contravene the requirements of a soil conservation notice issued under Part V of the SLC Act	No Soil Conservation Notice has been issued under art V of the *Soil and Land Conservation Act 1945.*	Not at variance to this criteria.
Clearing will or is likely to have a significant impact on matters of national environmental significance (in these instances, the clearing must be referred to the Commonwealth Department of Agriculture, Water and the *Environment under the Environment Protection and Biodiversity Conservation Act 1999).*	A review of MNES relevant to the APZ has been undertaken, as summarised below: • There are no World Heritage Places within a 5km radius of the APZ • There are no National Heritage Places within a 5km radius of the APZ • There are no Ramsar Wetlands within a 5km radius of the APZ • The proposal is located in Western Australia and will therefore not impact the Great Barrier Reef Marine Park • The APZ is located approximately 200 m inland from the coast and will not impact a Commonwealth Marine Area • The PMST search identified the potential for the TEC 'Banksia Woodlands of the Swan Coastal Plain ecological community' to occur proximate to the APZ. This TEC is not known to occur on the island and, as the key indicator species are absent, there is no vegetation within the APZ considered to be analogous with the TEC • No threatened species are likely to be significantly impacted by the proposed vegetation maintenance within the APZ as summarised below: – No conservation significant flora taxa were recorded within the APZ by FVC (2023) or 360 Environmental (2022). – During a site visit undertaken by RPS, the Quokka (*Setonix brachyurus*) was recorded within the APZ. Suitable habitat for this species is widespread across Rottnest Island (Wadjemup). Due to the widespread nature of similar habitat, clearing up to 0.1 ha of native vegetation is unlikely to materially impact the Quokka. Particularly as 0.09 ha (47% of the APZ) of native vegetation is being retained within the APZ. • No significant or critical habitat for migratory species has been identified within the APZ.	Not at variance to this criteria. The proposed vegetation maintenance within the APZ will not significantly impact any MNES.

Requirement	Assessment	Outcome
Clearing includes marine native vegetation clearing activities	The APZ is located approximately 200 m from the coast. The proposed vegetation maintenance will require the removal or relocation of 0.098 ha of dead material and debris and clearing 0.003 ha of living native terrestrial vegetation. No impacts to marine native vegetation will occur as a result of the proposal.	Not at variance to this criteria. Only terrestrial native vegetation will be impacted by the proposal.
Clearing may impact on protected or otherwise significant flora or fauna	**Conservation significant flora** No conservation significant taxa were recorded within the APZ (FVC 2023, 360 Environmental 2022). Vegetation clearing and maintenance within the APZ will not impact conservation significant flora species. **Conservation significant fauna** During a site visit undertaken by RPS, the Quokka (*Setonix brachyurus*) was recorded within the APZ. Although a desktop assessment did not identify any conservation significant fauna species having been previously recorded within the APZ, based on the site visit undertaken by RPS and the fauna assessment undertaken proximate to the APZ by Eco Logical (2024), there is also potential for the Rottnest Island dugite (*Pseudonaja affinis exilis*), Perth slider (*Lerista lineata*) and Rottnest Island bobtail (*Tiliqua rugosa konowi*) to occur within the APZ. These species are known to occur in coastal, heath and woodland habitats which are widespread across Rottnest Island (Wadjemup). Due to the widespread nature of similar habitat, clearing up to 0.1 ha of native vegetation is unlikely to materially impact these species. Particularly as 0.09 ha (47% of the APZ) of native vegetation is being retained within the APZ. Vegetation maintenance within the APZ was designed to minimise clearing where possible. As such, no large areas of vegetation are proposed to be cleared which would result in the fragmentation of fauna habitat. Although the APZ does not form part of an ecological linkage (see Section 3.6.1), there may be some fauna movement between the APZ and vegetation to the west, across Brand Way. Due to the retention of stands of vegetation within the APZ, the proposed maintenance will not impact this fauna movement.	Not at variance to this criteria. Maintenance and clearing of up to 0.1 ha of native vegetation will not significantly impact protected or otherwise significant flora or fauna.
Clearing will be within a highly cleared landscape or an area containing limited or restricted native vegetation types. An assessment of the proposed vegetation maintenance has been undertaken in accordance with the following criterion 1 thresholds and criteria: **a. If more than 1 ha is proposed to be cleared, a permit is required** **b. If less than 10% of that native vegetation association or complex is remaining within the relevant IBRA bioregion, a permit is required** **c. If less than 10% native vegetation is**	When DWER considers whether a permit is required, the department looks at the size of the proposed area to be cleared: • relative to the total remaining vegetation in the region where the proposed clearing is located, and • relative to the total remaining vegetation of the ecological community that the vegetation proposed to be cleared forms a part of (as each ecological community has its own unique characteristics, this is assessed on a case-by-case basis). For the purpose of this assessment, Rottnest Island (Wadjemup) is considered to be within the Metropolitan Perth Region Scheme Constrained area. An assessment against the relevant criteria is provided below: a. The proposed vegetation maintenance will require the removal or relocation of 0.098 ha of dead material and debris and clearing 0.003 ha of living native vegetation. Resulting in an overall impact of 0.1 ha, which is less than the 1 ha threshold and therefore the requirement for a clearing permit is not triggered b. The remaining extent for the Heddle et al. (1980) Quindalup Complex exceeds the 30% threshold for the Swan Coastal Plain IBRA region as outlined in Section 3.4.1. Consequently, the 10% threshold is not exceeded and the requirement for a clearing permit is not triggered c. Based on regional vegetation mapping across the island, there is over 900 ha of native vegetation present within 5km of the APZ (refer Table 9 and Figure 19). This comprises	

Requirement	Assessment	Outcome
remaining within a 5 km buffer of the proposed clearing, a permit is required.	59% of the 1,517 ha of land present within the 5km buffer, indicating that there is greater than 10% native vegetation remaining within 5 km of the APZ. 0.18 ha of the TEC *Callitris preissii* (or *Melaleuca lanceolata*) forests and woodlands of the Swan Coastal Plain (floristic community type 30a as originally described by Gibson et. al. 1994) was recorded within the APZ. Vegetation removal and maintenance within this TEC includes: • The relocation or removal of dead debris and vegetation (0.098 ha of the mapped TEC). The majority of this has been mapped as Degraded condition • Clearing 0.003 ha of living native vegetation comprising the TEC • The retention of 0.09 ha of vegetation comprising the TEC. Maintenance of this vegetation will include pruning to ensure compliance with bushfire guidelines. Overall, the proposed maintenance within the TEC will result in the removal of 0.1 ha of vegetation. An assessment of the significance of this impact has been undertaken as summarised below: • 44.39 ha vegetation analogous with the TEC was recorded within the larger FVC survey area. Removal of 0.1 ha of TEC within the APZ comprises 0.2% of the TEC recorded by FVC. • RIA have advised that the current known extent of the TEC on the island is 79 ha. Impacts to the TEC within the APZ comprises 0.12% of the overall TEC across the island. Consequently, RPS considers that as the proposed vegetation maintenance within the APZ will reduce the occurrence of the TEC present on the island by 0.12% (mainly through the removal of dead material and debris), the proposal will not significantly impact the TEC.	
Clearing is on land previously reserved as an environmental offset under the conditions of another approval under the EP Act	A review of available offset mapping indicates that the APZ is not reserved as an environmental offset under the conditions of another approval under the EP Act.	Not at variance to this criteria. The APZ is not known to comprise an offset.
Clearing is on land subject to a biodiversity conservation covenant under the *Biodiversity Conservation Act 2016*	Liaison with RIA confirms that the APZ is not on land subject to a biodiversity conservation covenant under the *Biodiversity Conservation Act 2016.*	Not at variance to this criteria. The APZ is not known to comprise a biodiversity conservation covenant.
Clearing is on land subject to a covenant under the *National Trust of Australia (WA) Act 1964*	Liaison with RIA confirms that the APZ is not on land subject to a covenant under the *National Trust of Australia (WA) Act 1964.*	Not at variance to this criteria. The APZ is not known to be subject to a covenant under the *National Trust of Australia (WA) Act 1964.*

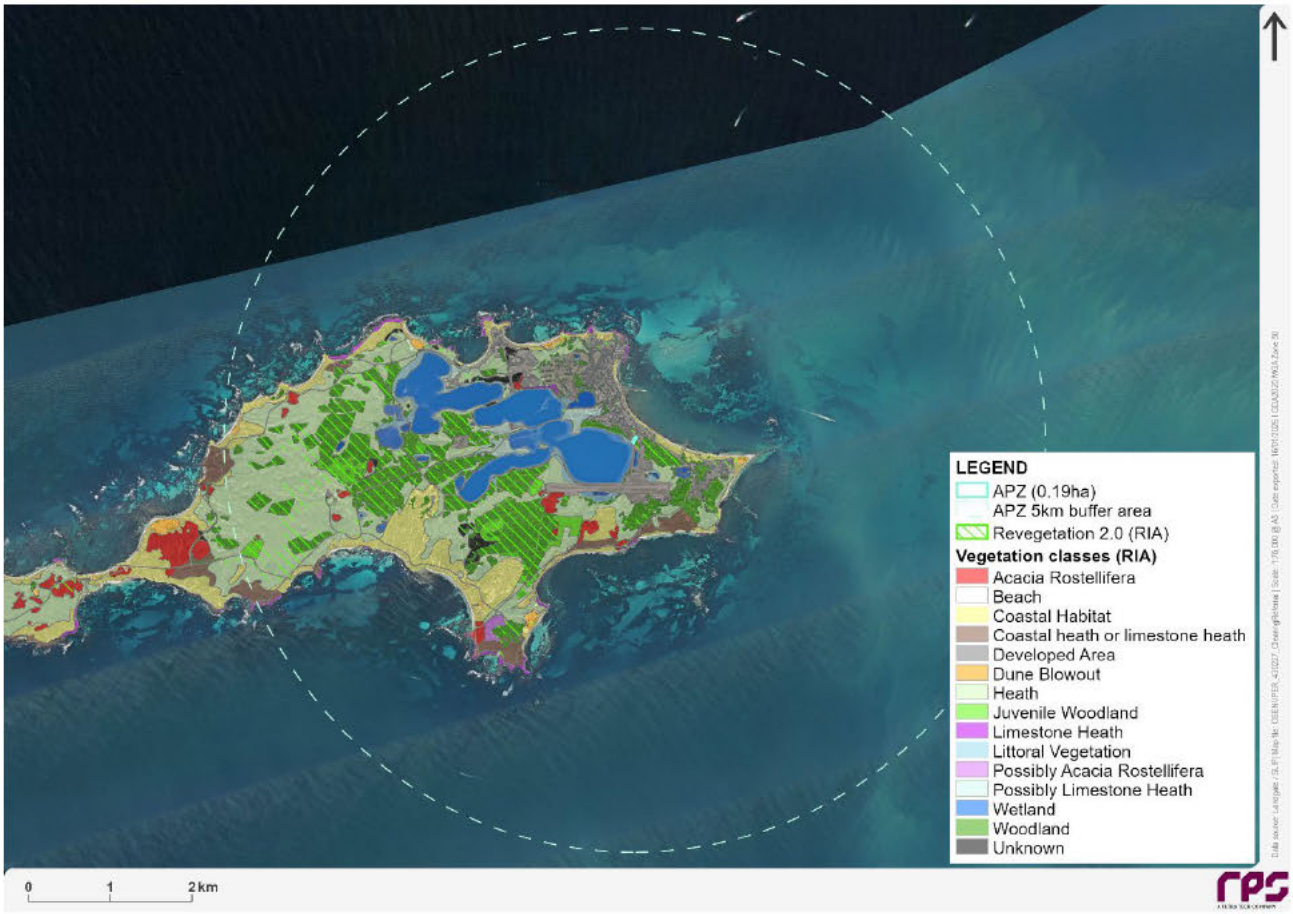


Figure 19: Vegetation mapping across Rottnest Island (Wadjemup)

Table 9: Vegetation extents within 5km of the APZ

Vegetation or landform feature	Area (ha)
Other	18.07
Acacia Rostellifera	21.49
Beach	21.68
Coastal Habitat	161.96
Coastal heath or limestone heath	39.03
Developed Area	155.46
Dune Blowout	12.036
Heath	451.90
Juvenile Woodland	38.54
Limestone Heath	17.70
Littoral Vegetation	40.27
Possibly Acacia Rostellifera	5.23
Possibly Limestone Heath	21.10
Wetland	208.21
Woodland	304.29

5 CONCLUSIONS

Vegetation maintenance within the 0.19 ha APZ includes the clearing of up to 0.1 ha of vegetation as summarised below:

- The removal or relocation of 0.098 ha of dead material and debris
- Clearing 0.003 ha of living native vegetation.

Of the 0.09 ha of retained vegetation within the APZ, some pruning will be required to ensure compliance with the Planning for Bushfire Guidelines (WAPC 2024).

The desktop and site assessment of the environmental values within the APZ concluded that the proposed vegetation maintenance and clearing within the APZ is not significant, as:

- Removal of living vegetation has been minimised where possible, resulting in the loss of 0.003 ha
- Due to the fact that the proposed activities comprises mainly the clearing of dead debris, it is not considered a significant environmental impact. A review of similar referrals supports this conclusion (e.g. referrals REF 11180/1 and REF 11117/1)
- The retention of vegetation where possible has minimised fragmentation
- No formal ecological linkages have been identified within the APZ. Vegetation to the west of Brand Way comprises vegetation forming a local ecological linkage. Although separated from this linkage by Brand Way, there may be some movement between the vegetation within the APZ and this linkage. Due to the retention of stands of native vegetation throughout the APZ, movement of fauna through this area will not be impacted
- The retention of patches of vegetation throughout the APZ will minimise the risk of erosion
- Vegetation removal and maintenance within the TEC is limited to:
  - The relocation or removal of dead debris and vegetation (0.098 ha of the TEC in Degraded condition)
  - Clearing 0.003 ha of living native vegetation comprising the TEC
  - The retention of 0.09 ha of vegetation comprising the TEC. Maintenance of this vegetation will include pruning to ensure compliance with bushfire guidelines.
- An assessment against the 10 clearing principles as outlined in Schedule 5 of the *Environmental Protection Act 1986* determined that the proposal is not at variance to any of the principles.

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Appendix A
Bushfire assessment (BPP 2026)

BUSHFIRE PRONE PLANNING

Samphire Worker's Accommodation

Asset Protection Zone & Vegetation Management

(PREPARED FOR PLANNING APPLICATION ASSESSMENT PURPOSES)

Compiled in accordance with State Planning Policy 3.7 Bushfire and the Planning for Bushfire Guidelines

Parker Point Road, Rottnest Island

City of Cockburn

Development Application - Vulnerable Land Uses

8 January 2026

Job Reference No: 220055

[redacted]

VERSION HISTORY		
Version	Status/Details	Date
1.0	Original	8 January 2026
-	-	

[redacted]

LIMITATIONS AND DISCLAIMER

Management of Risks Associated with Bushfire

For the subject planning proposal, the protection measures to be implemented based on information presented in this Bushfire Management Plan, prepared for land-use planning purposes, are the minimum requirements for management of the relevant risks.

The applied protection measures do not guarantee that during a bushfire event, no buildings or infrastructure will be damaged, persons injured, or fatalities occur - either on the subject site or off the site when evacuating.

This is substantially due to the unpredictable nature of fire weather conditions, bushfire behaviour and the actions of landowners and/or operators – including the correct implementation and ongoing maintenance of required and recommended protection measures (including bushfire resistant construction) and complying with public bushfire warnings and directions from emergency services - over which Bushfire Prone Planning has no control.

Provision of Mapping Data

All maps included herein are indicative in nature and are not to be used for accurate calculations. This data has been prepared for bushfire risk management planning purposes only. All depicted areas, contours and any dimensions shown are subject to survey.

Bushfire Prone Planning does not guarantee that this data is without flaw of any kind and disclaims all liability for any errors, loss or other consequence arising from relying on any information depicted.

When the separate provision of Digital Geographic Data (GIS Files) is an agreed project deliverable, these should be used in conjunction with the relevant information presented in the associated report. Areas and/or Dimensions specified in the report will have priority over digital data transmitted and must correspond to the final 'as-built' location of the applicable buildings, other structures or boundaries.

Bushfire Prone Planning's Liability

All surveys, forecasts, projections and recommendations made in this report, associated with the subject planning proposal, are made in good faith based on information available to Bushfire Prone Planning at the time.

Notwithstanding anything contained therein, Bushfire Prone Planning will not, except as the law may require, be liable for any loss or other consequences whether or not due to the negligence of their consultants, their servants or agents, arising out of the services provided by their consultants.

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EXECUTIVE SUMMARY

Bushfire Prone Planning was commissioned to undertake a site inspection to inform the required works associated with implementing the proposed Asset Protection Zone (APZ) for the Workers' Accommodation for the Samphire Hotel, located on Parker Point Road, Rottnest Island.

The site inspection was conducted on Wednesday, 10 December 2025 by Bushfire Prone Planning's Director, [redacted] (BPAD Level 3), and Bushfire Consultant, [redacted] BPAD Level 2). Attendance also included key stakeholders comprising the proponent (Hotel Rottnest), RPS (Environmental Consultants), Rottnest Island Authority (RIA), JBA Surveys, and members of the Prendiville Group, as the future custodians of the Workers' Accommodation site and associated Asset Protection Zone (APZ).

The purpose of this document is to provide clear guidance for the implementation and ongoing management of the APZ to ensure bushfire risk to the proposed Workers' Accommodation is minimised in perpetuity. This includes establishing practical measures for vegetation management, hazard mitigation, and long-term maintenance responsibilities.

This report provides specific and practical guidance for the implementation of the Asset Protection Zone (APZ). While further detail is contained within the body of this report, recommended works include targeted fuel management measures such as the removal of dead fuels and the management of vegetation to achieve appropriate canopy separation. These measures are intended to meet the technical requirements of the Planning for Bushfire Guidelines while prioritising the retention and ongoing management of native vegetation in accordance with State Planning Policy 3.7.

The primary objectives of the assessment are to:

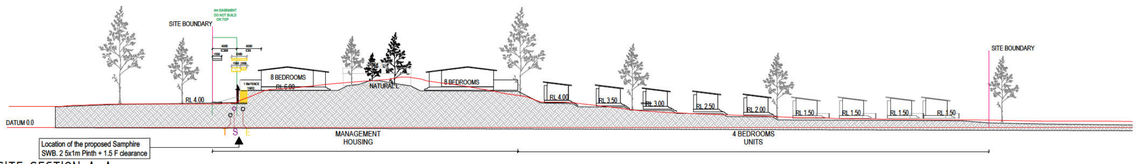
- Ensure the Asset Protection Zone (APZ) associated with the proposed Worker's Accommodation complies with State Planning Policy 3.7 (SPP 3.7), with specific regard to Policy Objective 5.4, which seeks to prioritise the retention of native vegetation for biodiversity conservation, environmental protection, and landscape amenity.
- Apply the Asset Protection Zone technical requirements outlined in Appendix B.2 (Siting and Design) and Table 9 of the Planning for Bushfire Guidelines to achieve an appropriate level of bushfire protection while minimising the extent of vegetation modification and clearing.
- Identify bushfire hazards and mitigation measures that demonstrably reduce risk to life and property while maintaining environmental values through sensitive APZ design, targeted fuel management, and ongoing maintenance of retained vegetation.

Bushfire hazards and mitigation measures have been carefully considered to reduce the need for extensive vegetation removal. Where native vegetation is retained, ongoing maintenance is critical to ensuring the effectiveness of the APZ over time. Responsibility for the ongoing management and maintenance of the APZ rests with the current and future landowners or custodians, as detailed within this document.

This report has been prepared by Bushfire Consultant Sarina Gorman (BPAD Level 2), with quality assurance undertaken by Bushfire Prone Planning's Director, Mike Scott (BPAD Level 3).

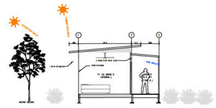
Details, Plans and Maps

SUBJECT LAND AND PROPONENT (LANDOWNER)		
Address Details	Parker Point Road, Rottnest Island	
Applicable Local Government	City of Cockburn	
Proponent	Hotel Rottnest	
Entity Commissioning Production of the BMP	Christou Design Group	
THE PLANNING PROPOSAL STAGE AND TYPE		
Strategic Planning Document	☐	N/A
Structure Plan	☐	N/A
Subdivision Application	☐	N/A
Development Application	☑	Construction of a habitable building and/or a vulnerable use that is subject to bushfire planning requirements.
DESCRIPTION		
This report has been prepared as supplementary information to accompany an application for the construction of new Staff Accommodation located at Parker Point Road, Rottnest Island in the City of Cockburn. This report should be read in conjunction with the Bushfire Management Plan (version 1.0 – dated 3 November 2025), prepared by Bushfire Prone Planning.		



SITE SECTION A-A

SCALE 1:500



CONCEPT PASSIVE STRATEGY - BUILDING SECTION

SCALE 1:200

Bushfire APZ & BAL Zones
27m APZ setback per Bushfire Prone Planning.
BAL-12.5/19 zones per AS3959.

The Asset Protection Zones (APZ) are determined by the BAL ratings for this site. Please refer to Table 3.3 within the Bushfire Management Plan (BMP), as this table details the required separation distances corresponding to the BAL ratings based on the vegetation assessed during the Bushfire Prone Planning site visit.

The ability for the APZ to be fully implemented and maintained is addressed throughout the BMP and supported by the "Landscape Management Plan ɤ Concept for Discussion Purposes Only." The final Landscape Management Plan will be delivered post-DA approval.

Accessibility
Accessible dwellings provided (1 × Manager, 1 × Supervisor, 1 × Line Staff); accessible paths per AS1428.1.

Cultural Heritage
Works exclude ACHIS-registered areas; stop-work and heritage protocol in place.

Sustainability
Sustainability and Energy Efficiency per Summation SDAR (06/10/25) exceeds NCC J

Waste Management
Waste facilities per Appendix I and central enclosed bin compound with washdown area.

Signage & Lighting
Dark-sky compliant lighting and signage per RIA Guideline 4.5.

Performance Solutions
Refer to Taycon NCC Advice Note 1 for Performance Solutions (kitchen, fire wall, accessibility).

Construction Management
Construction & Traffic Management Plan to be submitted at building permit stage.

Hydraulics
Connect to existing RIA DN225 sewer as per HDA H.01 layout; install 2000 L grease trap to Central Facility.

Vehicle Turning and Emergency Access
All internal roads and turning areas are designed in accordance with AS 2890.2 ɤ Off-Street Commercial Vehicle Facilities and Bushfire Prone Planning WA ɤ Vehicular Access Technical Requirements to ensure safe maneuverability for service and emergency vehicles, including 8.8 m fire appliance access. Clearances, gradients and radii will be verified during detailed design to maintain compliance and all-weather access within the designated Asset Protection Zone (APZ).

OPEN SPACE CALCULATIONS
Total Site Area = 10,077m2
Built Area = 2107m2
Open Space = 7970m2

Earthworks

The layout has been revised to remove any intrusion into the strip of land to the north that currently accommodates several services. The earthworks design will be completed to ensure full access is maintained to the services, and any retaining walls in the proximity of existing services will be designed with deep footings to ensure that services can be accessed from above without the risk of undermining any structures.

The current design roughly balances cut and fill on the site, with a total of 2050m3 cut and 2300m3 fill, requiring a small amount of additional fill to be imported into site. This can be further refined during detailed design though it is noted there may be some additional fill won on-site for footing, stormwater and services excavations.

Sewer Easement Alignment and RIA Access Requirements

A mapped sewer alignment traverses the subject site, as identified on the Development Application (DA) site plan and Hydraulics Design (HDA) drawings. The proposed DN225 gravity sewer main and associated manholes (PSMS1-PSMS8) run between the accommodation clusters, connecting to the central facilityus grease trap and discharging to the Rottnest Island Authority (RIA) sewer network.

The line staff, supervisor, and management housing clusters are positioned close to this corridor; however, no buildings or structures encroach within the sewer alignment.

As the RIA is the licensed water and sewer service provider for Rottnest Island, unimpeded, 24-hour access to all sewer infrastructure must be maintained. The proposal has therefore been designed to satisfy the relevant provisions of RIA's planning instruments, including:

Settlement Design Guidelines requiring safety clearances and maintainable access to all essential services.

Development Plans Guideline requiring that service alignments and access corridors are clearly dimensioned and documented on development drawings.

Staff Housing Design Guidelines requiring early identification and protection of existing service corridors to avoid impacts on critical infrastructure.

This approach ensures compliance with RIA's service access and maintenance requirements while maintaining efficient site planning and constructability.

Landscaping and Vegetation Management
See Landscaping Plan Appendix C

Native species, low-water use, APZ-compliant planting per Landscape Report (Appendix C).

Landscaping will retain and rehabilitate native vegetation wherever possible, with clearing limited to building footprints, essential services, and the 27 m APZ defined in the Bushfire Management Plan. New planting will meet AS 3959 and RIA Landscape Guidelines, using low-fuel native species with maintained canopy separation.

Mature trees outside construction and APZ areas will be protected, and disturbed areas revegetated with local provenance species to restore stability and habitat. Vegetation removal in heritage or sensitive areas will require RIA approval. Ongoing maintenance will manage weeds and ground fuels to maintain APZ compliance in accordance with the approved Landscape Plan MP01 Rev A and Bushfire Management Plan.

SITE PLAN

SCALE 1:500

REV	DATE	DESCRIPTION	BY
L	21/11/2025	100% for DA Rev.3	JM
L	20/11/2025	100% for DA Rev.2	JM
L	12/11/2025	100% for DA	JM
L	7/11/2025	75% for DA presentation	JM
L	24/10/2025	25% for DA presentation	JM
L	15/10/2025	TO CONSULTANTS	JM
K	8/10/2025	25% for DA presentation	JM

L 21/11/2025

Landscape:	Landscape Elements
BCA:	Taycon Group
Electrical:	Lucid
Hydraulic:	Hydraulics Design Australia | HDA
Civil:	Wallbridge Gilbert Aztec | WGA
Bushfire:	Bushfire Prone Planning

ROTTNEST ISLAND STAFF ACCOMMODATION
FOR THE PRENDIVILLE GROUP

PRENDIVILLE GROUP

Drawing Title: SITE PLAN
MASTERPLAN & UNIT OPTIONS

Status: MASTERPLAN

Drawn: JM Checked: JC

Scale: 1:500 @ A1 Job Number: 24033

FORMERLY JAMES CHRISTOU + PARTNERS ARCHITECTS

CHRISTOU
ARCHITECTURE / URBAN DESIGN / INTERIOR DESIGN
12 GUGERI STREET
CLAREMONT WA 6010
T / +61 8 9285 6888
F / +61 8 9285 6883
E / studio@christou.com.au
ABN 87 152 933 885
ACN 152 933 885

Drawing Number DA-1100

Revision L

Figure 2

Proposed Development Map

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ LEGEND ------

- Hydrant Identified
- Aboriginal Cultural Heritage Sites
- Sewer Easement Area
- Cadastral
- Subject Site

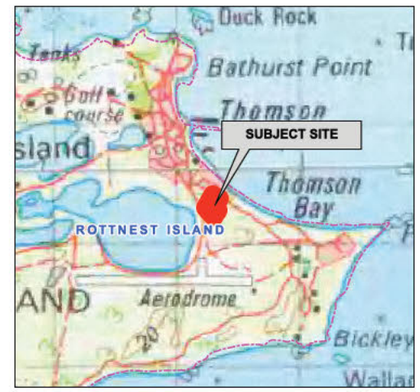
Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms
- Management Housing
- Asset Protection Zone / RIA Lease Area
- CPS 988/1 - Existing Clearing Permit

0 10 20 30 40 50

Metres

------ LOCALITY ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 12-01-2026
SCALE (A3): 1 : 800

BUSHFIRE PRONE PLANNING

Figure 3

Proposed Asset Protection Zone

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ GENERAL NOTES ------

Significant Trees Identified - To be Retained

Tree Removal Required - Unavoidable
To allow for construction of Workers' Accommodation

Vegetation Cells -To be Retained
WORKS REQUIRED:
- Under-Pruning of trees/scrub within Vegetation Cells to 2m above the ground. Dead branches are to be removed.

- Canopy Separation to 2-5m - 5m preferred.
5m canopy separation required to adjoining unmanaged vegetation outside the APZ, with the exception of the Coastal Mort Located near Brand Way.
The Coastal Mort branches are to be trimmed to 2m above the ground. Detached bark and fine fuels are to be removed.
- Loose bark to be removed from Coastal Morts.

Vegetation Removal Required - Unavoidable
To allow for construction of Workers' Accommodation

Removal of Dead Material /Relocation & Replacement of Habitat
WORKS REQUIRED:
- Removal of dead material - All dead fine fuels to be removed (<6mm).
NOTE: Dead tree trunks with branches >25mm (Coarse/heavy fuel) can be retained for habitat. Large logs to be removed for the purposes of APZ implementation, but can be placed back in the area for habitat.

BRAND WAY

------ LEGEND ------

Surveyed Linework

Asset Protection Zone / RIA Lease Area

Vegetation Cells To be Retained

Vegetation Removal Required Unavoidable

Significant Trees Identified To be Retained

Tree Removal Required Unavoidable

Removal of Dead Material / Relocation & Replacement of Habitat

Aboriginal Cultural Heritage Sites

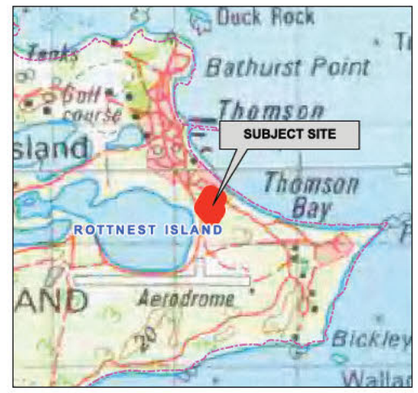
Subject Site

Master Plan - Revision L

Central Facility
Common Living
1 Bedroom
2 Bedrooms
3 Bedrooms
4 Bedrooms
6 Bedrooms
8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 07-01-2026
SCALE (A3): 1 : 325

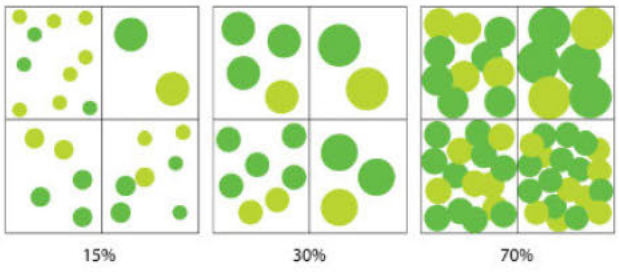
BUSHFIRE PRONE PLANNING

220055_Proposed APZ_v1_Samphire Staff Accommodation - Stage 2_v1.0.qgz

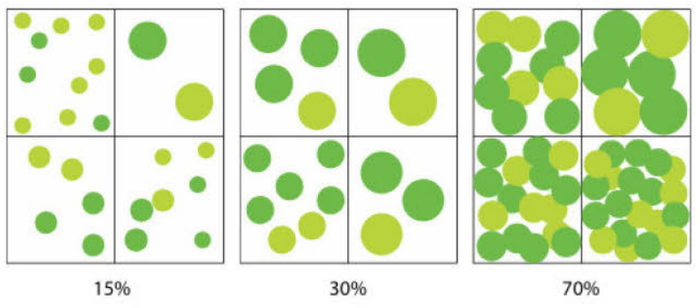
ASSET PROTECTION ZONE SPECIFICATIONS

The Planning for Bushfire Guidelines (WAPC 2024) Appendix B – Table 9: Asset Protection Zone (APZ) Technical Requirements provides the accepted requirements for Asset Protection Zones (APZs).

Table 9: Asset Protection Zone (APZ) technical requirements

OBJECT	REQUIREMENT
Fences within the APZ	Should be constructed from non-combustible materials (for example, iron, brick, limestone, metal post and wire, or bushfire-resisting timber referenced in Appendix F of AS 3959).
Fine fuel load (combustible, dead vegetation matter less than 6 mm in thickness)	• Should be managed and removed on a regular basis to be maintained as low threat vegetation • Should be maintained at less than two tonnes per hectare (on average) • Mulches should be non-combustible such as stone, gravel, shells, rock or crushed mineral earth or wood mulch more than five millimetres in thickness.
Trees* (more than 6 m in height)	• Trunks at maturity should be a minimum distance of six metres from all elevations of the building • Branches at maturity should not touch or overhang a building or powerline • Lower branches and loose bark should be removed to a height of two metres above the ground and/or surface vegetation. • Canopy cover within the APZ should be less than 15 per cent of the total APZ area • Tree canopies at maturity should be at least 5 m apart to avoid forming a continuous canopy. Stands of existing mature trees with interlocking canopies may be treated as an individual canopy provided the total canopy cover within the APZ does not exceed 15 per cent and is not connected to the tree canopy outside the APZ. **Tree canopy cover – ranging from 15 to 70 per cent at maturity**  15% 30% 70%

OBJECT	REQUIREMENT
Shrub* and scrub* (0.5 m to 6 m in height). Shrub and scrub more than 6 m in height are to be treated as trees.	• Should not be located under trees or within three metres of buildings • Should not be planted in clumps more than five square metres in area • Clumps should be separated from each other and any exposed window or door by at least 10 metres.
Ground cover* (less than 0.5 m in height. Ground cover more than 0.5 m in height is to be treated as shrub)	• Can be planted under trees but must be maintained to remove dead plant material, as prescribed in 'Fine fuel load' above • Can be located within two metres of a structure but three metres from windows or doors if more than 100 mm in height.
Grass	• Grass should be maintained at a height of 100 mm or less, at all times • Wherever possible, perennial grasses should be used and well-hydrated with regular application of wetting agents and efficient irrigation.
Defendable space	Within three metres of each wall or supporting post of a habitable building; the area is kept free from vegetation but can include ground cover, grass and non- combustible mulches as prescribed above.
Liquid petroleum gas cylinders	• Should be located on the side of a building farthest from the likely direction of a bushfire or on the side of a building where surrounding classified vegetation is upslope, at least one metre from vulnerable parts of a building • The pressure relief valve should point away from the house • No flammable material within six metres from the front of the valve • Must sit on a firm, level and non-combustible base and be secured to a solid structure.

SUMMARY OF ASSET PROTECTION ZONE REQUIREMENTS		
PLANNING FOR BUSHFIRE GUIDELINES (WAPC 2024) APPENDIX B – TABLE 9: ASSET PROTECTION ZONE (APZ) TECHINCAL REQUIREMENTS		SITE SPECIFIC MANAGEMENT
Object	**Requirement**	**Requirement**
Fences within the APZ	Should be constructed from non-combustible materials (for example, iron, brick, limestone, metal post and wire, or bushfire-resisting timber referenced in Appendix F of AS 3959).	• Following Table 9 • Fences within the APZ are to be non-combustible
Fine fuel load (combustible, dead vegetation matter less than 6 mm in thickness)	• Should be managed and removed on a regular basis to be maintained as low threat vegetation • Should be maintained at less than two tonnes per hectare (on average) • Mulches should be non-combustible such as stone, gravel, shells, rock or crushed mineral earth or wood mulch more than five millimetres in thickness.	• Following Table 9 - Specific Requirements Outlined Below: On-going maintenance includes but is not limited to: • Removal of all dead material (shrubs, grasses and leaf litter) • Weed control/removal Ongoing maintenance for 3m APZ area. Refer to Figure 4 and JUSTIFICATION FOR VARIATION FROM GUIDELINE SEPARATION DISTANCES information below. • No combustible mulch to be used • Fine dead fuels shall be managed to <2 t/ha. • Loose bark shall be removed during fire season. • Maintenance shall be ongoing during fire season.
Trees* (more than 6 m in height)	• Trunks at maturity should be a minimum distance of six metres from all elevations of the building • Branches at maturity should not touch or overhang a building or powerline • Lower branches and loose bark should be removed to a height of two metres above the ground and/ or surface vegetation. • Canopy cover within the APZ should be less than 15 per cent of the total APZ area • Tree canopies at maturity should be at least 5 m apart to avoid forming a continuous canopy. Stands of existing mature trees with interlocking canopies may be treated as an individual canopy provided the total canopy cover within the APZ does not exceed 15 per cent and is not connected to the tree canopy outside the APZ. Tree canopy cover – ranging from 15 to 70 per cent at maturity  15% 30% 70%	• Following Table 9 - Specific Requirements Outlined Below: • Lower branches and loose bark should be removed to a height of two metres above the ground and/ or surface vegetation. • Tree canopies at maturity should be at least 5 m apart to avoid forming a continuous canopy. Stands of existing mature trees with interlocking canopies may be treated as an individual canopy provided the total canopy cover within the APZ does not exceed 15 per cent and is not connected to the tree canopy outside the APZ. • Shrub and Scrub (0.5m to 6m in height) Should not be located under trees or within three metres of buildings. Note – Further detail and visual context on the above is provided below. Ongoing maintenance for 3m APZ area. Refer Figure 4 and JUSTIFICATION FOR VARIATION FROM GUIDELINE SEPARATION DISTANCES information below. No trees are to be located within the 3m APZ area. **Note – Approval should be sought from relevant agencies prior to modification or removal of any native vegetation.**

Shrub* and scrub* (0.5 m to 6 m in height). Shrub and scrub more than 6 m in height are to be treated as trees.	• Should not be located under trees or within three metres of buildings • Should not be planted in clumps more than five square metres in area • Clumps should be separated from each other and any exposed window or door by at least 10 metres.	• Following Table 9
Ground cover*(less than 0.5 m in height. Ground cover more than 0.5 m in height is to be treated as shrub)	• Can be planted under trees but must be maintained to remove dead plant material, as prescribed in 'Fine fuel load' above • Can be located within two metres of a structure but three metres from windows or doors if more than 100 mm in height.	• Following Table 9 Ongoing maintenance for 3m APZ area. Refer to Figure 4 and JUSTIFICATION FOR VARIATION FROM GUIDELINE SEPARATION DISTANCES information below. • No ground covers to be planted in this area.
Grass	• Grass should be maintained at a height of 100 mm or less, at all times • Wherever possible, perennial grasses should be used and well-hydrated with regular application of wetting agents and efficient irrigation.	• Following Table 9 Ongoing maintenance for 3m APZ area. Refer to Figure 4 and JUSTIFICATION FOR VARIATION FROM GUIDELINE SEPARATION DISTANCES information below. • No grass allowed in this area.
Defendable space	Within three metres of each wall or supporting post of a habitable building; the area is kept free from vegetation but can include ground cover, grass and non-combustible mulches as prescribed above.	• Following Table 9 Ongoing maintenance for 3m APZ area. Refer map xx and JUSTIFICATION FOR VARIATION FROM GUIDELINE SEPARATION DISTANCES information below. • No combustible ground cover, grass and mulches allowed in this area.
Liquid petroleum gas cylinders	• Should be located on the side of a building farthest from the likely direction of a bushfire or on the side of a building where surrounding classified vegetation is upslope, at least one metre from vulnerable parts of a building • The pressure relief valve should point away from the house • No flammable material within six metres from the front of the valve • Must sit on a firm, level and non-combustible base and be secured to a solid structure.	• Following Table 9

JUSTIFICATION FOR VARIATION FROM GUIDELINE SEPARATION DISTANCES

Professional Judgement and Practitioner Experience

This Report has been co-prepared and reviewed by a BPAD Level 3 Bushfire Practitioner, with extensive experience in bushfire operations, risk assessment, performance-based design, and application of professional judgement in environmentally constrained locations. The proposed variation from the generic guideline requirement for a minimum 3 m vegetation separation distance is based on a detailed site-specific assessment of bushfire hazards, fuel characteristics, vegetation structure, asset vulnerability and ongoing land management practices.

The Bushfire Protection Guidelines are intended to provide broad, precautionary standards applicable across a wide range of contexts. However, they expressly allow for performance-based solutions where supported by expert judgement, evidence-based mitigation measures, and where the bushfire risk outcome is demonstrably equivalent or improved.

Environmental Sensitivity and Significance

The subject site is located within Rottnest Island, a Class A Reserve of exceptionally high environmental and conservation value. The retention of native vegetation is a key management objective for the Island and is consistent with State and Reserve-level environmental policy.

The vegetation in proximity to buildings is native and will have low fuel loads and will be well managed, contributing to ecological integrity, landscape character and biodiversity values. Wholesale removal or excessive modification of vegetation to achieve a prescriptive separation distance would result in disproportionate environmental impact, without a commensurate reduction in bushfire risk when compared with targeted, fine-scale fuel management.

Justification for Variation from 2024 Planning for Bushfire Guidelines

The proposed variation from the prescriptive vegetation separation distances is a defensible, outcomes-based solution consistent with the 2024 Planning for Bushfire Guidelines and SPP 3.7 – Bushfire. The approach achieves acceptable bushfire risk outcomes while protecting the significant environmental values of Rottnest Island, an 'A' Class Reserve.

GUIDELINE / POLICY REFERENCE (2024)	ACCEPTABLE SOLUTION / INTENT	SITE CONSTRAINT / ISSUE	PROPOSED VARIATION	JUSTIFICATION / PERFORMANCE OUTCOME
SPP 3.7 – Bushfire Policy Framework	Development to manage bushfire risk while balancing environmental outcomes	Site located on Rottnest Island, a Class A Reserve with high conservation value	Retention of native vegetation within prescribed distances	Variation aligns with SPP 3.7 objectives, particularly Objective 5.4, which prioritises retention of native vegetation where bushfire risk can be acceptably managed
SPP 3.7 – Policy Objective 5.4	Retain native vegetation while managing bushfire risk	Strict vegetation clearance would result in unnecessary environmental impact	Performance-based fuel management instead of full clearance	Native vegetation retained due to environmental sensitivity, with bushfire risk mitigated through targeted fuel reduction measures
Planning for Bushfire Guidelines (2024) – Outcomes-Based Approach	Acceptable solutions may be replaced with outcomes-based solutions where outcomes are met	Prescriptive separation distances not fully achievable without environmental harm	Outcomes-based solution applied	Equivalent bushfire risk outcome achieved through professional judgement, site-specific mitigation and ongoing management
Guidelines – Bushfire Protection Criteria (Vegetation Management)	Vegetation separation distances applied to reduce flame contact and radiant heat	Vegetation present within 3 m of buildings	Vegetation retained within 3 m with enhanced management	Intent of separation distance achieved through fuel structure modification rather than full removal

Guidelines – Fuel Management Principles	Reduce fuel loads and vertical fuel continuity	Environmental constraints limit extent of vegetation removal	Under-pruning and fuel reduction measures implemented	Vegetation under pruned to 2.5 m, standard requirement is under prune to 2m, ladder fuels removed, and fine fuels managed to reduce flame height and ember generation
Guidelines – Risk-Based Assessment	Bushfire risk assessed considering likelihood and consequence	Unique island context with managed vegetation and controls	Risk managed through mitigation rather than clearance	Reduced likelihood of flame contact and ember accumulation results in low residual risk to assets
Guidelines – BMP Preparation and Professional Input	BMP to be informed by suitably qualified practitioner	Site requires expert judgement due to constraints	BPAD Level 3 practitioner assessment	Variation supported by professional bushfire planning judgement and experience in performance-based design
Guidelines – Ongoing Management and Maintenance	Bushfire mitigation measures must be maintained over time	Risk could increase without active management	Formalised ongoing vegetation maintenance regime	Dead material, loose bark and fine fuels removed regularly; no combustible materials permitted in understorey
Guidelines – Consequential Fire Consideration	Prevent fire spread from vegetation to buildings	Reduced separation distance could increase risk if unmanaged	Structural and fuel controls mitigate spread	Absence of fuel continuity, managed vegetation structure and maintenance reduce likelihood of consequential fire impacting buildings

General Note - Refer to the Asset Protection Zone Specifications section and Justification for Variation from Guideline Separation Distances section contained within this report for further details.

Under-pruning to increase to 2.5m above the ground for vegetation located within 3m of a structure

Under-pruning to increase to 2.5m above the ground for vegetation located within 3m of a structure

Under-pruning to increase to 2.5m above the ground for vegetation located within 3m of a structure

Cell 1

Cell 2

Cell 3

Cell 4

Cell 5

Cell 6

Cell 7

Cell 8

Figure 4

Asset Protection Zone Works - 3 metre Enhanced Vegetation Management

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ LEGEND ------

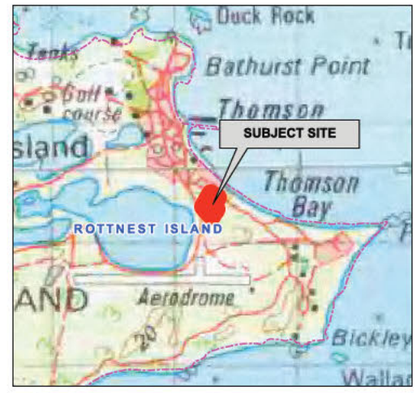
- 3m Enhanced Vegetation Management Area
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Aboriginal Cultural Heritage Sites
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



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Map by: 08-01-2026
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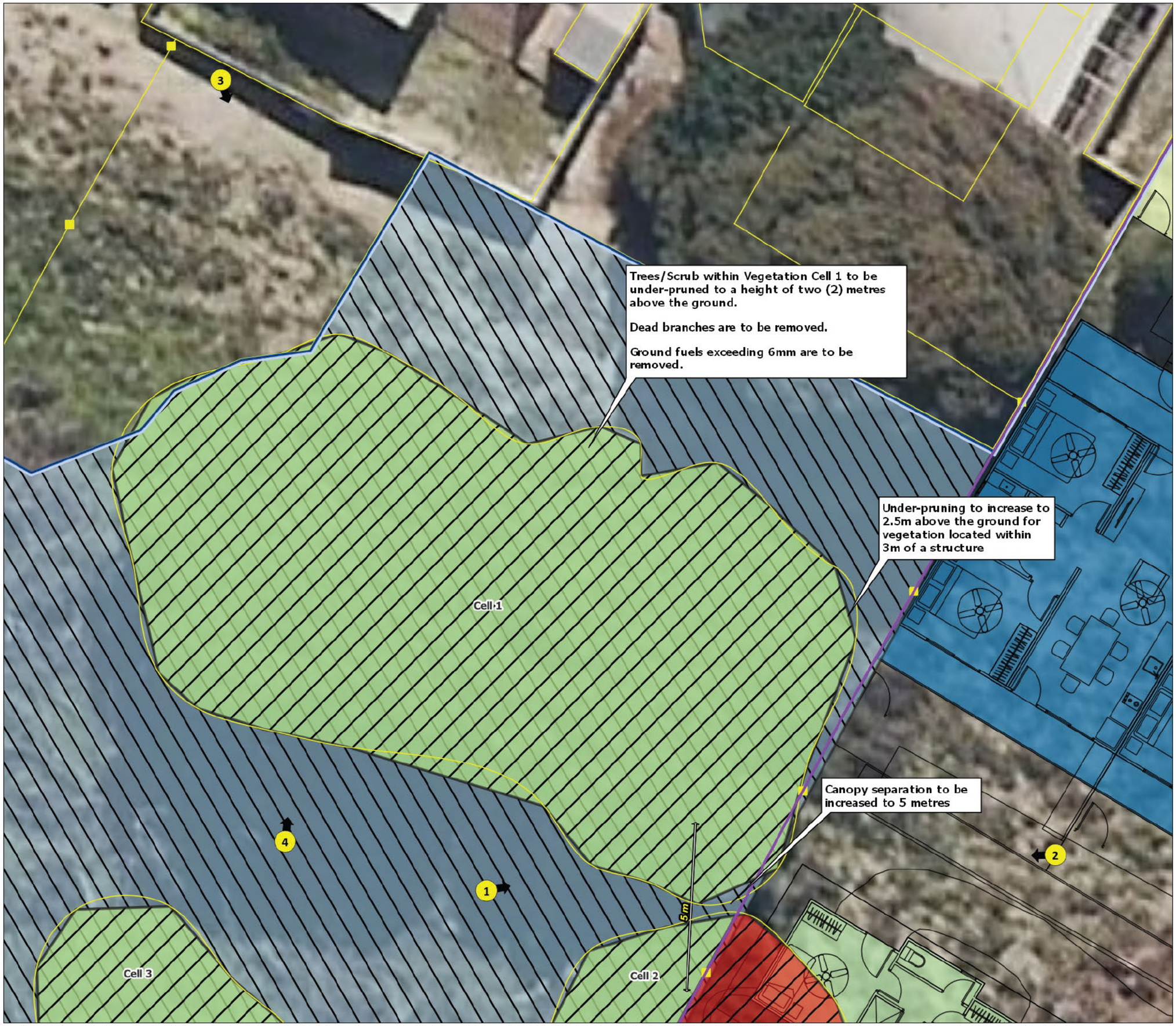


Figure 5

Asset Protection Zone Works - Vegetation Cell 1

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ **LEGEND** ------

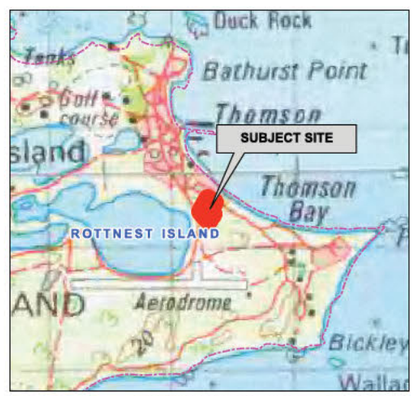
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Cell 1 Canopy Separation (m)
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ **LOCALITY** ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 105

BUSHFIRE PRONE PLANNING

220055_APZ_Cell1_Samphire Staff Accommodation - Stage 2_v1.0.qgz

APZ– VEGETATION CELL 1 Within the defined APZ, the following works are required:	
CANOPY SEPARATION	
	
PHOTO ID: 1	PHOTO ID: 1 – Mark-up
	
PHOTO ID: 2	PHOTO ID: 2 – Mark-up
WORKS REQUIRED ➡	➢ Canopy separation between Vegetation Cells 1 and 2 to be increased to five (5) metres.

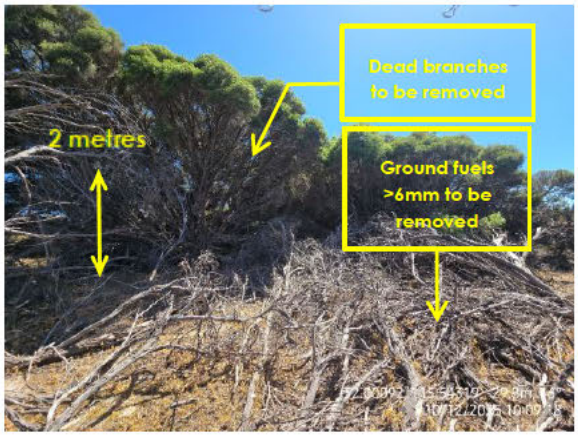
<table>
<tr><th colspan="2">APZ– VEGETATION CELL 1
Within the defined APZ, the following works are required:</th></tr>
<tr><th colspan="2"><u>UNDERSTOREY</u></th></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 3</td><td>PHOTO ID: 3 – Mark-up</td></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 4</td><td>PHOTO ID: 4 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED</td><td>➢ Trees/Scrub within Vegetation Cell 1 to be under-pruned to a height of two (2) metres above the ground.
➢ Dead branches are to be removed
➢ Ground fuels exceeding 6mm are to be removed.</td></tr>
</table>

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Figure 6

Asset Protection Zone Works - Vegetation Cell 2

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

Cell 1
Cell 2
Cell 3
Cell 4
Cell 6
5 m
5 m
1
2
3
4
5
Canopy separation to be increased to 5 metres
Canopy separation to be increased to 5 metres
Cell 2 - Unavoidable removal to allow for construction
Under-pruning to increase to 2.5m above the ground for vegetation located within 3m of a structure
Trees/Scrub within Vegetation Cell 2 to be under-pruned to a height of two (2) metres above the ground.
Dead branches are to be removed.
Ground fuels exceeding 6mm are to be removed.
Cypress Trees (T4 to T7) - Unavoidable removal to allow for construction

------ LEGEND ------

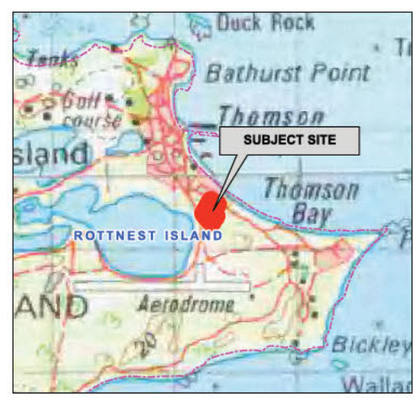
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Cell 2 Canopy Separation (m)
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 110

BUSHFIRE PRONE PLANNING

APZ– VEGETATION CELL 2

Within the defined APZ, the following works are required:

CANOPY SEPARATION

PHOTO ID: 1

PHOTO ID: 1 – Mark-up

PHOTO ID: 2

PHOTO ID: 2 – Mark-up

WORKS REQUIRED ➡

- Canopy separation between Vegetation Cells 2 and 3 to be increased to five (5) metres.
- *Note – Photo ID's 1 & 2 also contained within Cell 1 works.*

<table>
<tr><th colspan="2">APZ– VEGETATION CELL 2
Within the defined APZ, the following works are required:</th></tr>
<tr><th colspan="2"><u>CANOPY SEPARATION</u></th></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 3</td><td>PHOTO ID: 3 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED ➡</td><td>➢ Canopy separation between Vegetation Cells 2 and 3 to be increased to five (5) metres.</td></tr>
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APZ– VEGETATION CELL 2

Within the defined APZ, the following works are required:

UNDERSTOREY

PHOTO ID: 4

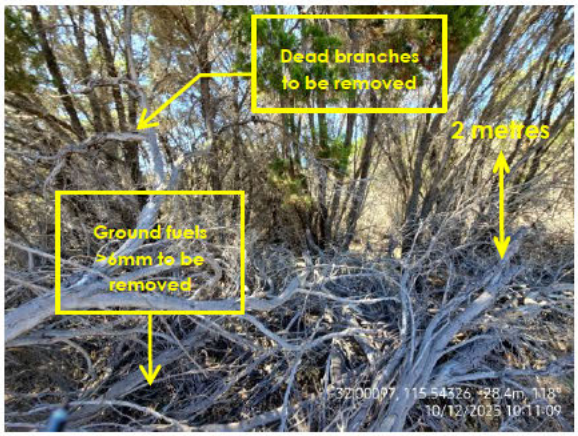

PHOTO ID: 4 – Mark-up

PHOTO ID: 5

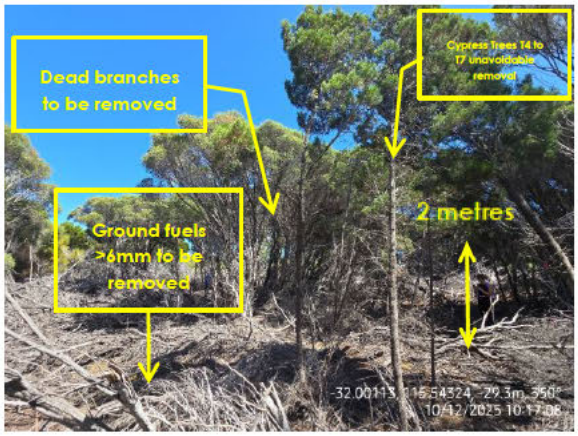

PHOTO ID: 5 – Mark-up

WORKS REQUIRED ➡

- Trees/Scrub within Vegetation Cell 2 to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed
- Ground fuels exceeding 6mm are to be removed.

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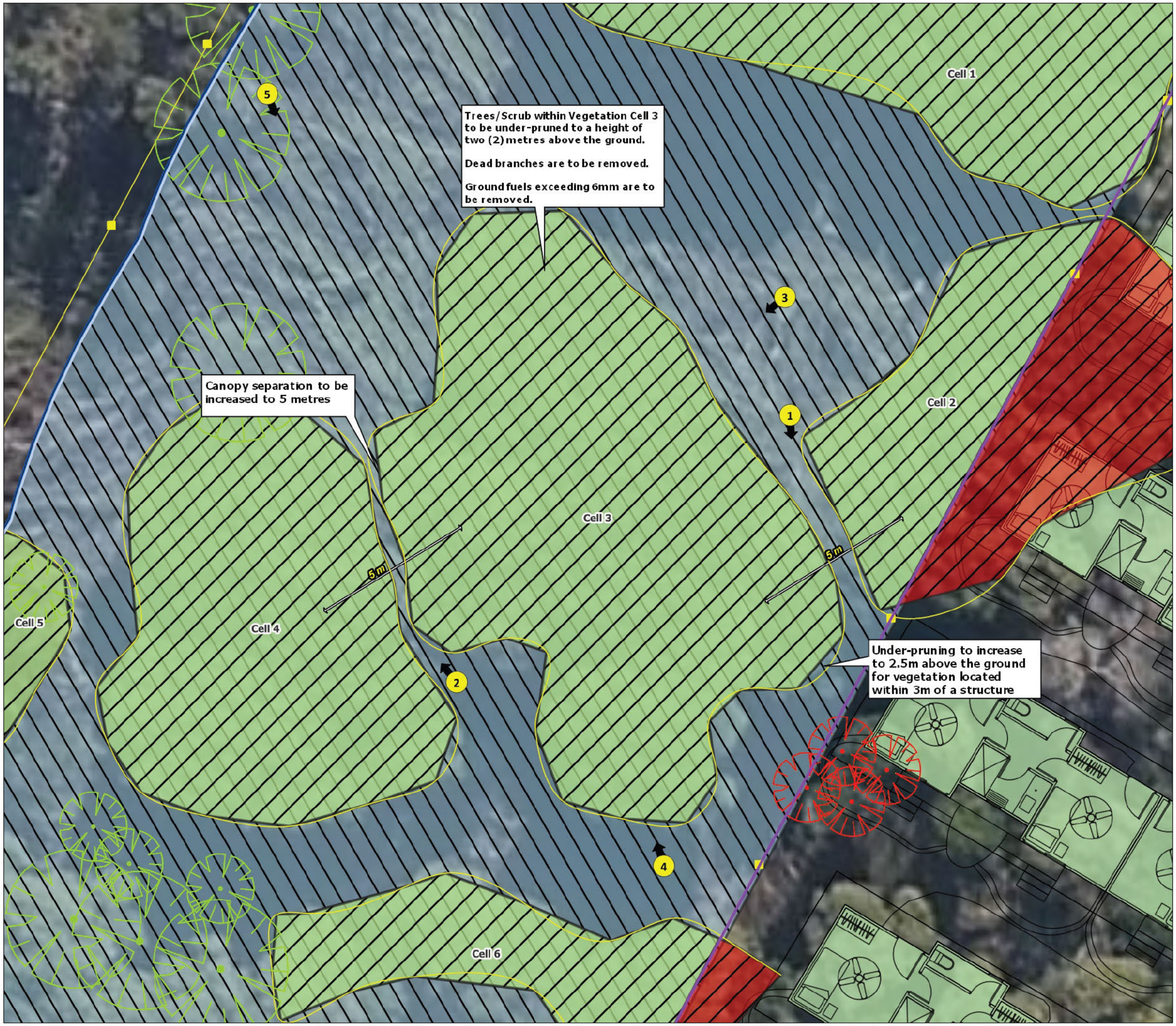


Figure 7

Asset Protection Zone Works - Vegetation Cell 3

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ **LEGEND** ------

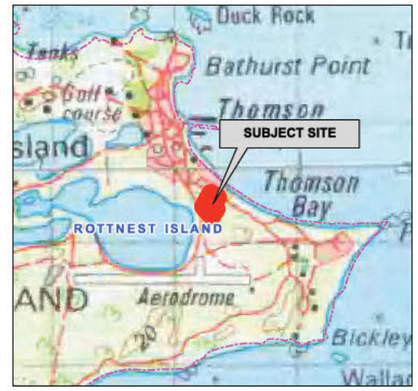
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Cell 3 Canopy Separation (m)
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ **LOCALITY** ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 110

BUSHFIRE PRONE PLANNING

APZ– VEGETATION CELL 3

Within the defined APZ, the following works are required:

CANOPY SEPARATION

PHOTO ID: 1

PHOTO ID: 1 – Mark-up

PHOTO ID: 2

PHOTO ID: 2 – Mark-up

WORKS REQUIRED ➡

- Canopy separation between Vegetation Cells 3 and 4 to be increased to five (5) metres.
- *Note – Photo ID 1 also contained within Cell 2 works.*

APZ– VEGETATION CELL 3

Within the defined APZ, the following works are required:

UNDERSTOREY

PHOTO ID: 3

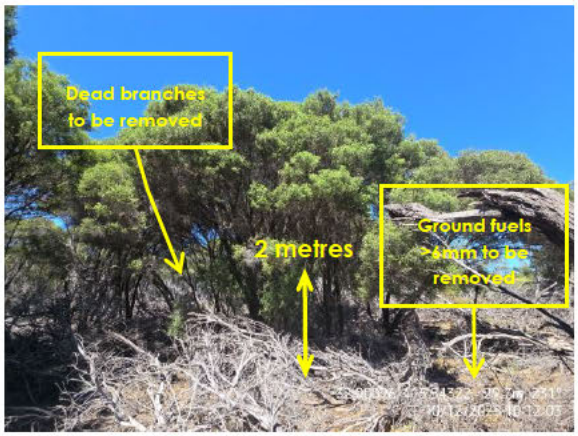


PHOTO ID: 3 – Mark-up

PHOTO ID: 4

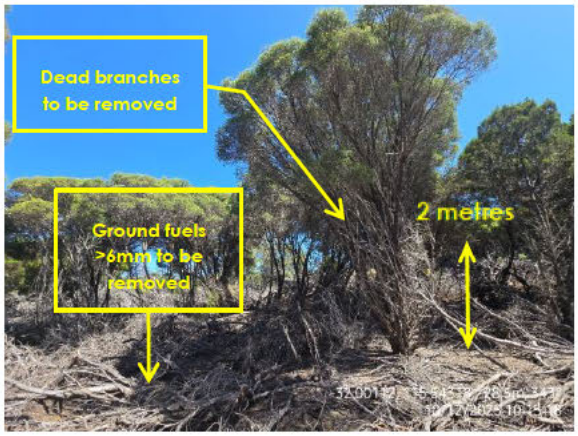
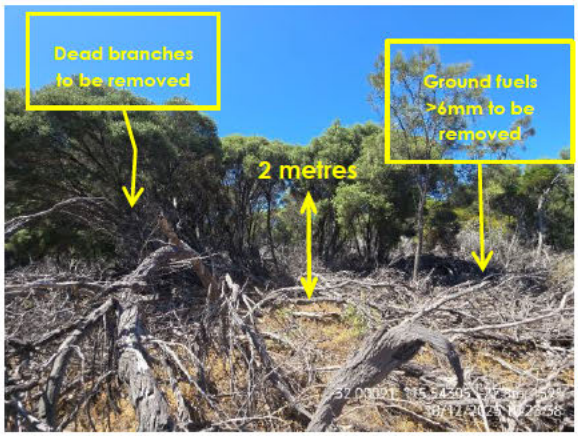


PHOTO ID: 4 – Mark-up

WORKS REQUIRED

- Trees/Scrub within Vegetation Cell 3 to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed
- Ground fuels exceeding 6mm are to be removed.

APZ– VEGETATION CELL 3 Within the defined APZ, the following works are required:	
UNDERSTOREY	
	
PHOTO ID: 5	PHOTO ID: 5 – Mark-up
WORKS REQUIRED ➡	➢ Trees/Scrub within Vegetation Cell 3 to be under-pruned to a height of two (2) metres above the ground. ➢ Dead branches are to be removed ➢ Ground fuels exceeding 6mm are to be removed.

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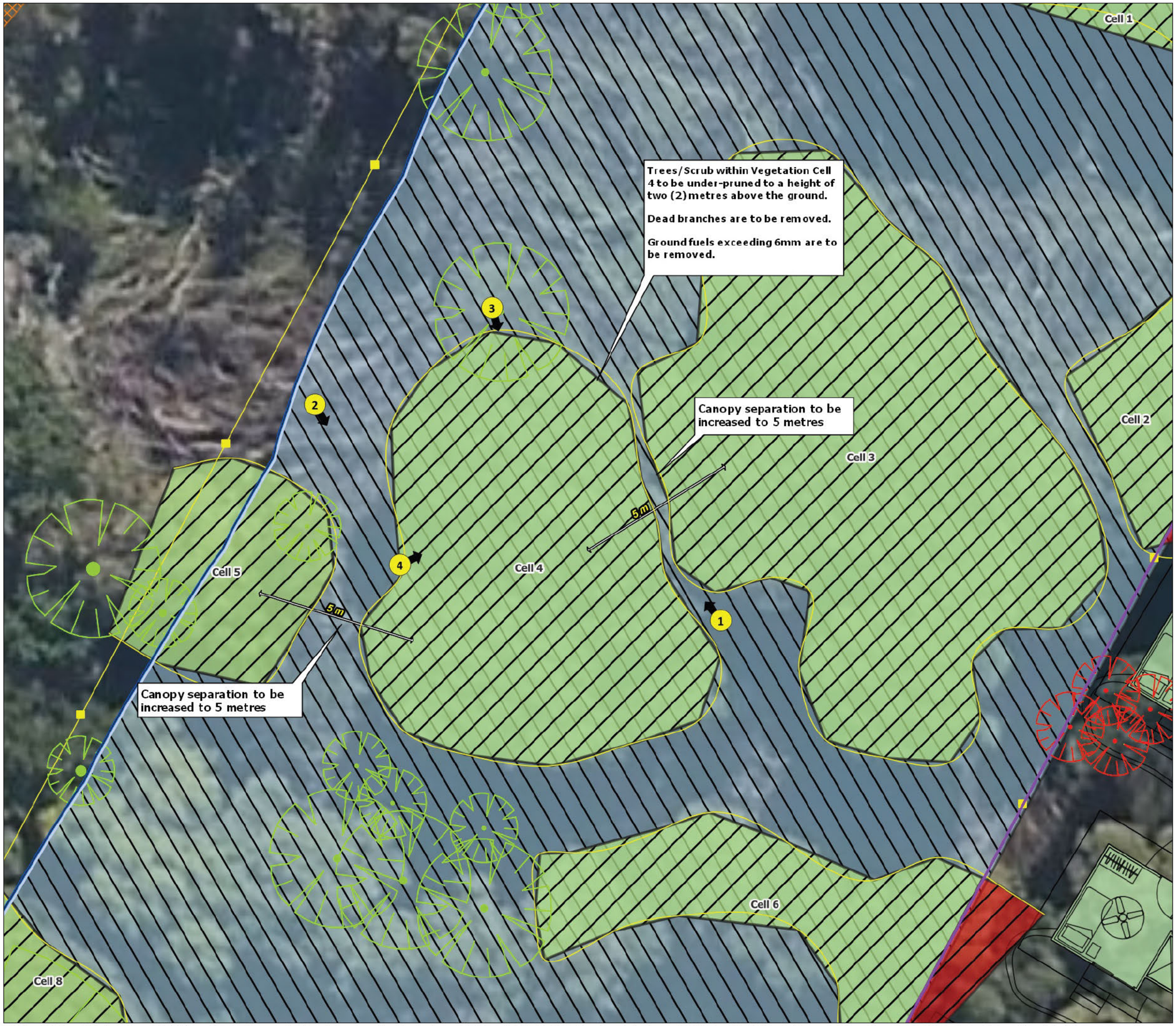


Figure 8

Asset Protection Zone Works - Vegetation Cell 4

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ LEGEND ------

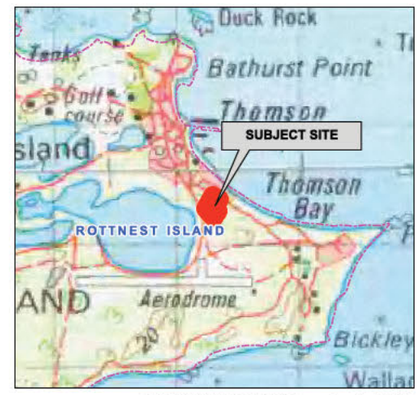
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Cell 4 Canopy Separation (m)
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



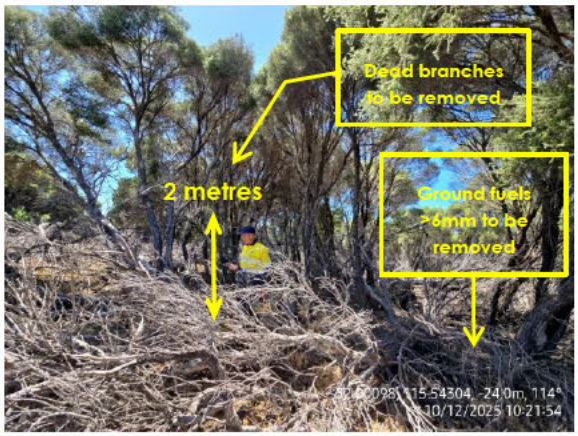
AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 110

BUSHFIRE PRONE PLANNING

220055_APZ_Cell4_Samphire Staff Accommodation - Stage 2_v1.0.qgz

<table>
<tr><th colspan="2">APZ– VEGETATION CELL 4
Within the defined APZ, the following works are required:</th></tr>
<tr><th colspan="2"><u>CANOPY SEPARATION</u></th></tr>
<tr><td>  </td><td>  </td></tr>
<tr><td>PHOTO ID: 1</td><td>PHOTO ID: 1 – Mark-up</td></tr>
<tr><td>  </td><td>  </td></tr>
<tr><td>PHOTO ID: 2</td><td>PHOTO ID: 2 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED</td><td>➢ Canopy separation between Vegetation Cells 4 and 5 to be increased to five (5) metres.
➢ Note – Photo ID 1 also contained within Cell 3 works.</td></tr>
</table>

<table>
<tr><th colspan="2">APZ– VEGETATION CELL 4
Within the defined APZ, the following works are required:</th></tr>
<tr><th colspan="2"><u>UNDERSTOREY</u></th></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 3</td><td>PHOTO ID: 3 – Mark-up</td></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 4</td><td>PHOTO ID: 4 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED</td><td>➢ Trees/Scrub within Vegetation Cell 4 to be under-pruned to a height of two (2) metres above the ground.
➢ Dead branches are to be removed
➢ Ground fuels exceeding 6mm are to be removed.</td></tr>
</table>

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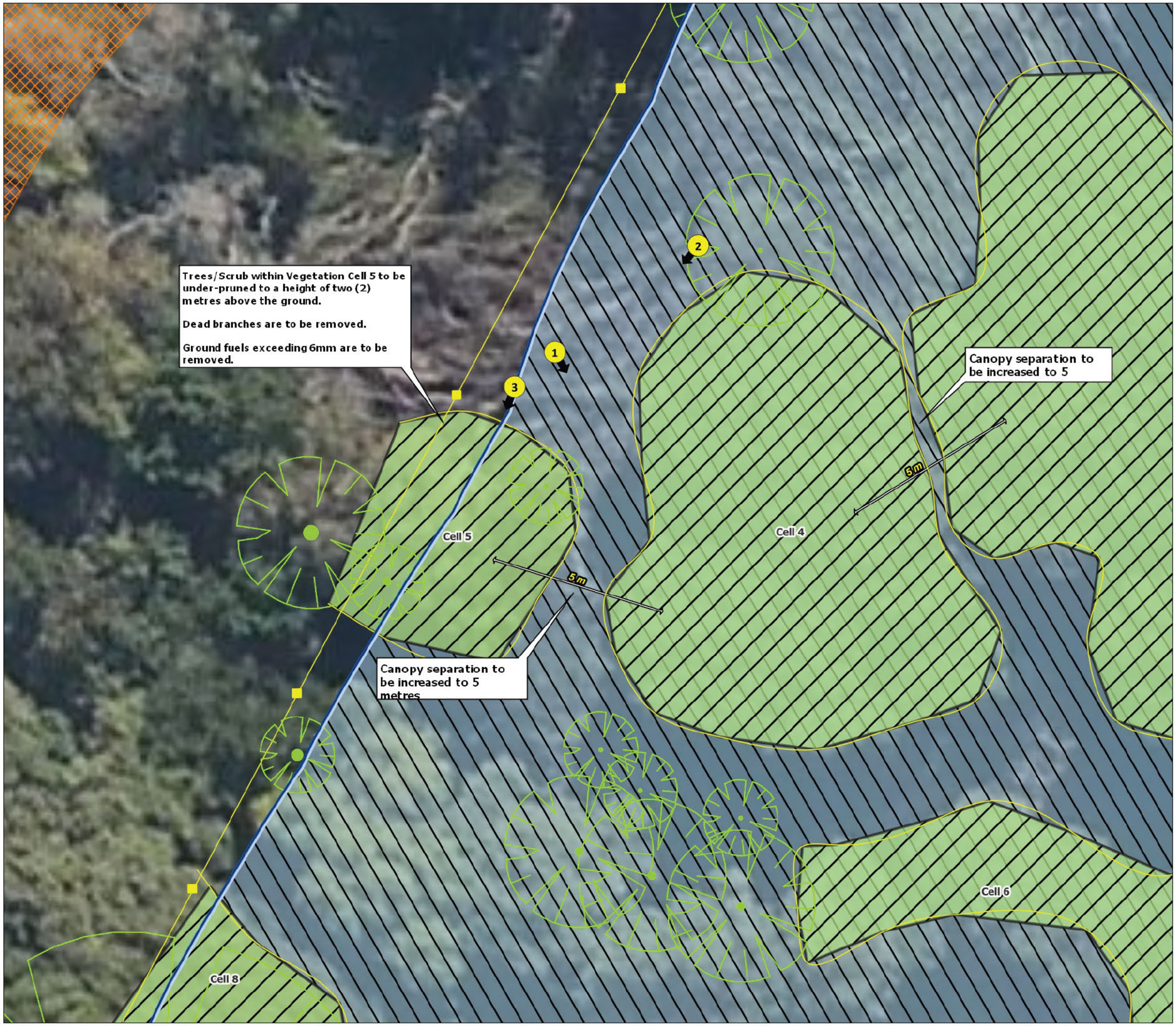


Figure 9

Asset Protection Zone Works - Vegetation Cell 5

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ LEGEND ------

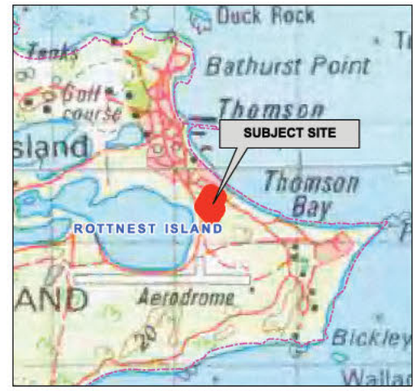
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Cell 5 Canopy Separation (m)
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 100

BUSHFIRE PRONE PLANNING

APZ– VEGETATION CELL 5

Within the defined APZ, the following works are required:

CANOPY SEPARATION

PHOTO ID: 1	PHOTO ID: 1 – Mark-up
WORKS REQUIRED ➡	➢ Canopy separation between Vegetation Cells 4 and 5 to be increased to five (5) metres. ➢ *Note – Photo ID 1 also contained within Cell 4 works.*

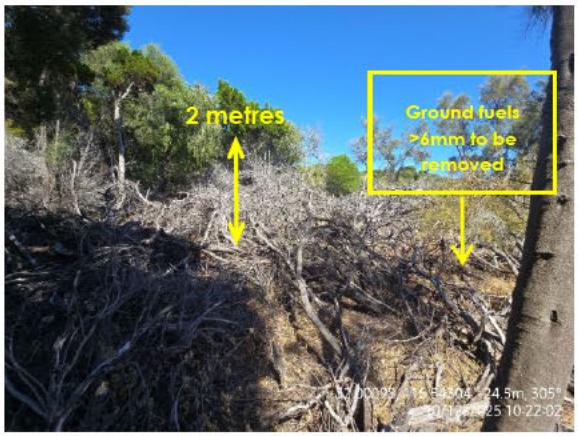
<table>
<tr><th colspan="2">APZ– VEGETATION CELL 5
Within the defined APZ, the following works are required:</th></tr>
<tr><th colspan="2"><u>UNDERSTOREY</u></th></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 2</td><td>PHOTO ID: 2 – Mark-up</td></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 3</td><td>PHOTO ID: 3 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED</td><td>➢ Trees/Scrub within Vegetation Cell 5 to be under-pruned to a height of two (2) metres above the ground.
➢ Dead branches are to be removed
➢ Ground fuels exceeding 6mm are to be removed.</td></tr>
</table>

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Figure 10

Asset Protection Zone Works - Vegetation Cell 6

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

Cell 2
Cell 3
Cell 4
Cell 5
Cell 6
Cell 7
Cell 8

5m
5m
5m

1
2
3
4
5
6

Trees/Scrub within Vegetation Cell 6 to be under-pruned to a height of two (2) metres above the ground.

Dead branches are to be removed.

Ground fuels exceeding 6mm are to be removed.

Cell 6 - Unavoidable removal to allow for construction

Under-pruning to increase to 2.5m above the ground for vegetation located within 3m of a structure

Canopy separation to be increased to 5 metres

------ LEGEND ------

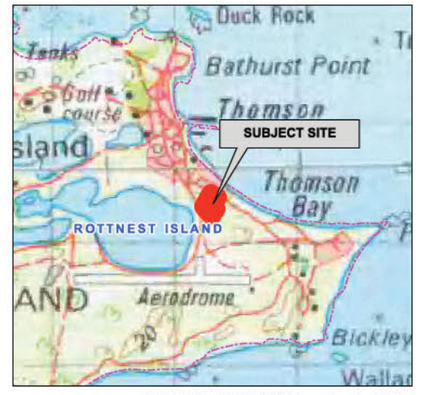
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Cell 6 Canopy Separation (m)
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



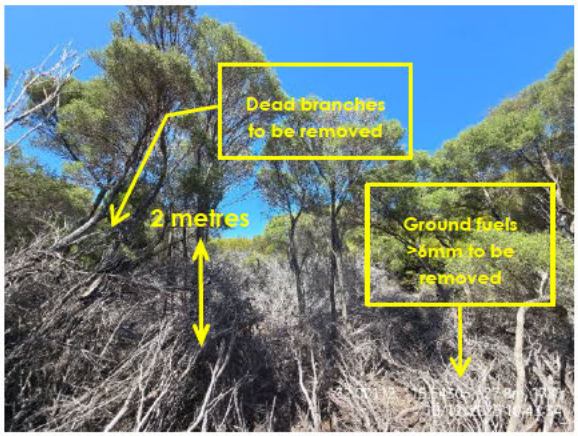
AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 100

BUSHFIRE PRONE PLANNING

APZ– VEGETATION CELL 6 Within the defined APZ, the following works are required:	
CANOPY SEPARATION	
	
PHOTO ID: 1	PHOTO ID: 1 – Mark-up
	
PHOTO ID: 2	PHOTO ID: 2 – Mark-up
WORKS REQUIRED ➡	➢ Canopy separation between Vegetation Cells 3, 4 and 6 to be increased to five (5) metres.

APZ– VEGETATION CELL 6 Within the defined APZ, the following works are required:	
CANOPY SEPARATION	
	
PHOTO ID: 3	PHOTO ID: 3 – Mark-up
WORKS REQUIRED ➡	➢ Canopy separation between Vegetation Cells 6 and 7 to be increased to five (5) metres.

<table>
<tr><th colspan="2">APZ– VEGETATION CELL 6
Within the defined APZ, the following works are required:</th></tr>
<tr><th colspan="2"><u>UNDERSTOREY</u></th></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 4</td><td>PHOTO ID: 4 – Mark-up</td></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 5</td><td>PHOTO ID: 5 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED</td><td>➢ Trees/Scrub within Vegetation Cell 6 to be under-pruned to a height of two (2) metres above the ground.
➢ Dead branches are to be removed
➢ Ground fuels exceeding 6mm are to be removed.</td></tr>
</table>

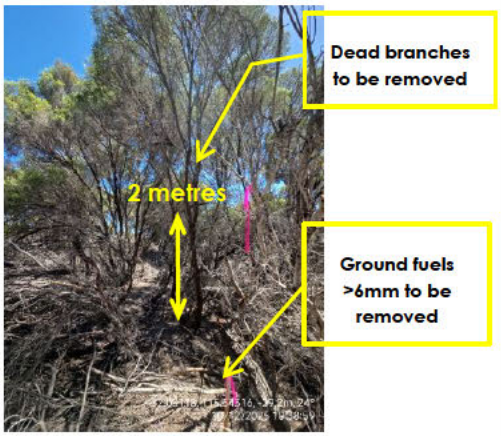
APZ– VEGETATION CELL 6 Within the defined APZ, the following works are required:	
UNDERSTOREY	
	
PHOTO ID: 6	PHOTO ID: 6 – Mark-up
WORKS REQUIRED ➡	➢ Trees/Scrub within Vegetation Cell 6 to be under-pruned to a height of two (2) metres above the ground. ➢ Dead branches are to be removed ➢ Ground fuels exceeding 6mm are to be removed.

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Figure 11

Asset Protection Zone Works - Vegetation Cell 7

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

Cell 4
Cell 3
Cell 6
Cell 7
Cell 8
5 m
Canopy separation to be increased to 5 metres
Cell 7 - Unavoidable removal to allow for construction
Under-pruning to increase to 2.5m above the ground for vegetation located within 3m of a structure
Cypress Trees (T23 & T24) - Unavoidable removal to allow for construction
Trees/Scrub within Vegetation Cell 6 to be under-pruned to a height of two (2) metres above the ground.

Dead branches are to be removed.

Ground fuels exceeding 6mm are to be removed.

1
2
3

------ LEGEND ------

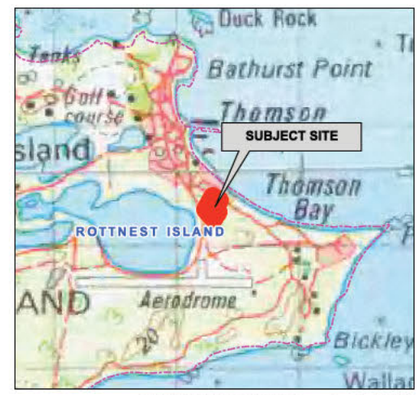
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Cell 6 Canopy Separation (m)
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 100

BUSHFIRE PRONE PLANNING

220055_APZ_Cell7_Samphire Staff Accommodation - Stage 2_v1.0.qgz

APZ– VEGETATION CELL 7

Within the defined APZ, the following works are required:

CANOPY SEPARATION

PHOTO ID: 1	PHOTO ID: 1 – Mark-up
WORKS REQUIRED ➡	➢ Canopy separation between Vegetation Cells 6 and 7 to be increased to five (5) metres. ➢ *Note – Photo ID 1 also contained within Cell 6 works.*

APZ– VEGETATION CELL 7

Within the defined APZ, the following works are required:

UNDERSTOREY

PHOTO ID: 2

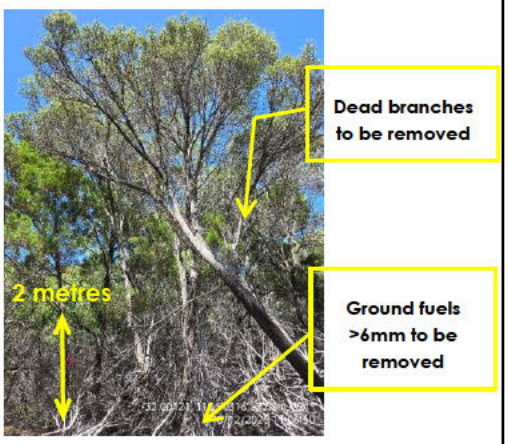


PHOTO ID: 2 – Mark-up

PHOTO ID: 3

PHOTO ID: 3 – Mark-up

WORKS REQUIRED

- Trees/Scrub within Vegetation Cell 7 to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed
- Ground fuels exceeding 6mm are to be removed.

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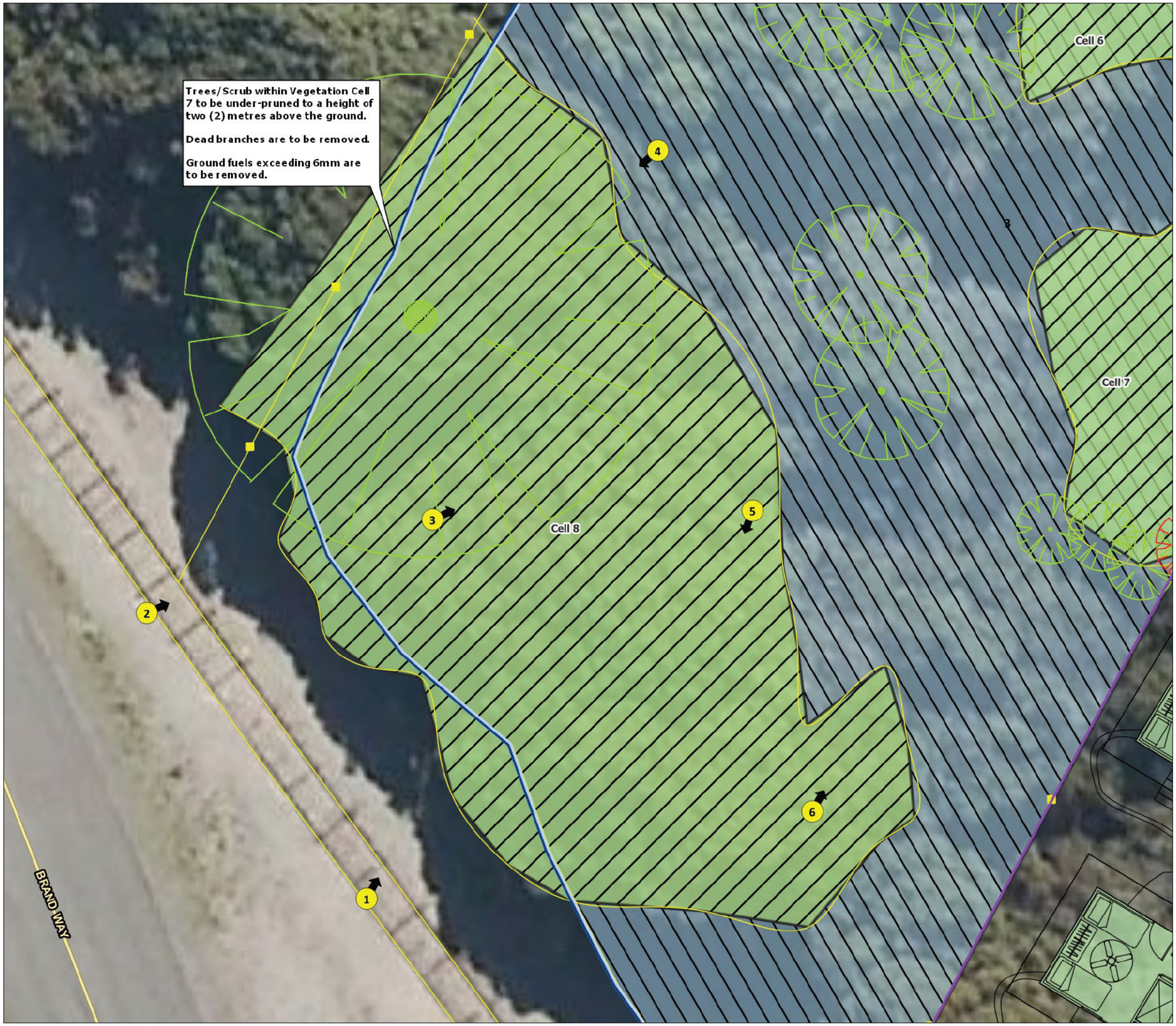


Figure 12

Asset Protection Zone Works - Vegetation Cell 8

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ **LEGEND** ------

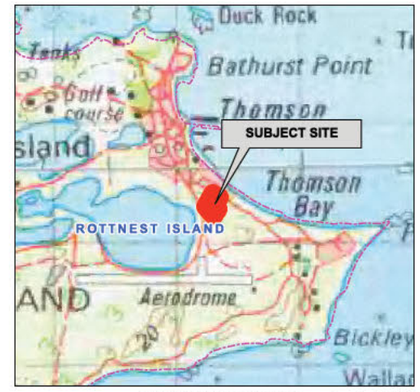
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Cell 6 Canopy Separation (m)
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ **LOCALITY** ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 110

BUSHFIRE PRONE PLANNING

APZ– VEGETATION CELL 8

Within the defined APZ, the following works are required:

UNDERSTOREY

PHOTO ID: 1

PHOTO ID: 1 – Mark-up

PHOTO ID: 2

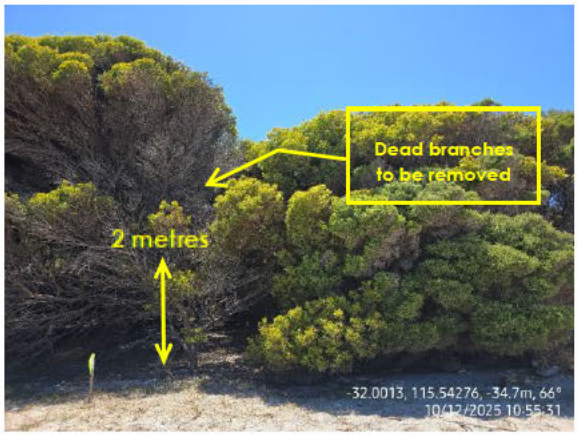
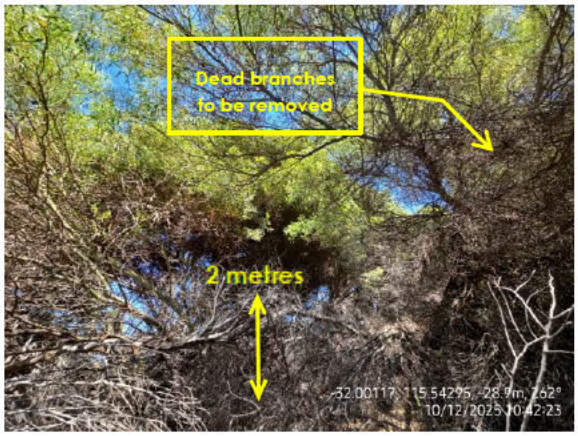


PHOTO ID: 2 – Mark-up

WORKS REQUIRED ➡

- Trees/Scrub within Vegetation Cell 8 to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed
- Ground fuels exceeding 6mm are to be removed.

<table>
<tr><th colspan="2">APZ– VEGETATION CELL 8
Within the defined APZ, the following works are required:</th></tr>
<tr><th colspan="2"><u>UNDERSTOREY</u></th></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 3</td><td>PHOTO ID: 3 – Mark-up</td></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 4</td><td>PHOTO ID: 4 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED</td><td>➢ Trees/Scrub within Vegetation Cell 8 to be under-pruned to a height of two (2) metres above the ground.
➢ Dead branches are to be removed
➢ Ground fuels exceeding 6mm are to be removed.</td></tr>
</table>

APZ– VEGETATION CELL 8

Within the defined APZ, the following works are required:

UNDERSTOREY

PHOTO ID: 5

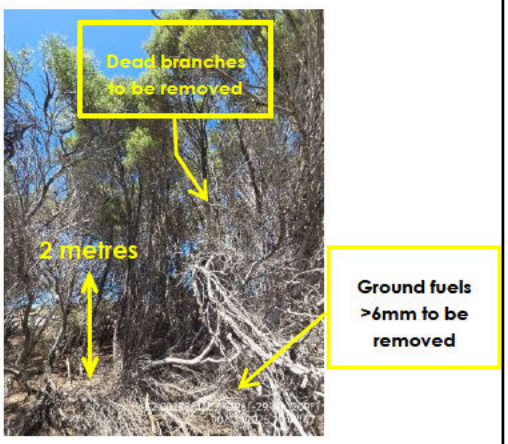


PHOTO ID: 5 – Mark-up

PHOTO ID: 6

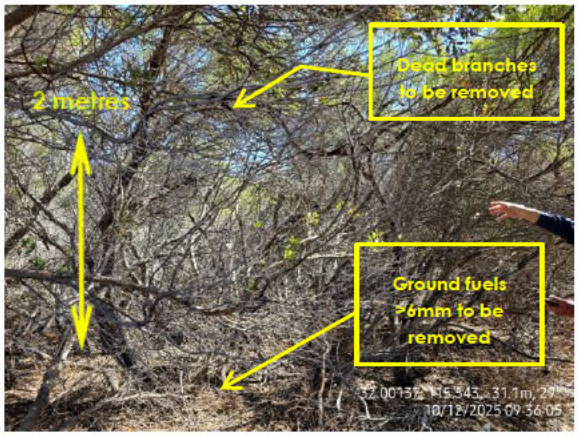


PHOTO ID: 6 – Mark-up

WORKS REQUIRED

- Trees/Scrub within Vegetation Cell 8 to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed
- Ground fuels exceeding 6mm are to be removed.

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Figure 13

Asset Protection Zone Works - Removal of Dead Material / Relocation & Replacement of Habitat

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ LEGEND ------

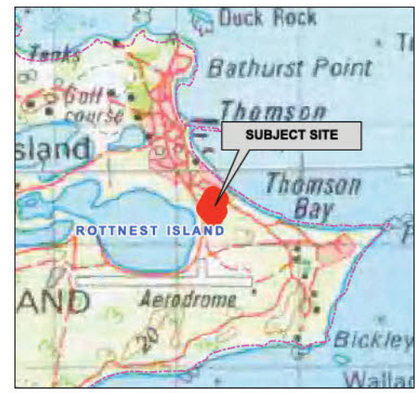
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Aboriginal Cultural Heritage Sites
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 350

BUSHFIRE PRONE PLANNING

220055_APZ_Habitat_Samphire Staff Accommodation - Stage 2_v1.0.qgz

APZ – REMOVAL OF DEAD MATERIAL / RELOCATION & REPLACEMENT OF HABITAT

Within the defined APZ, the following works are required:

PHOTO ID: 1

PHOTO ID: 1 – Mark-up

WORKS REQUIRED ➡

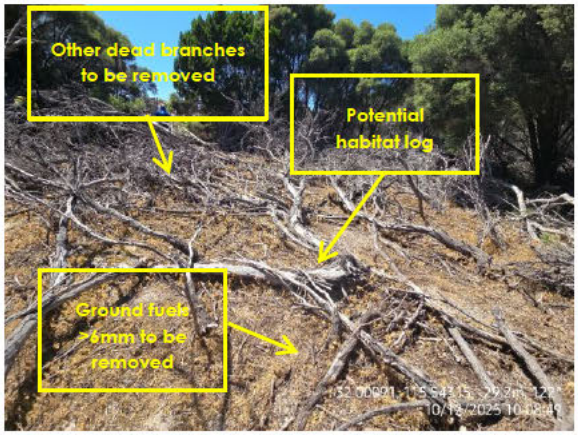
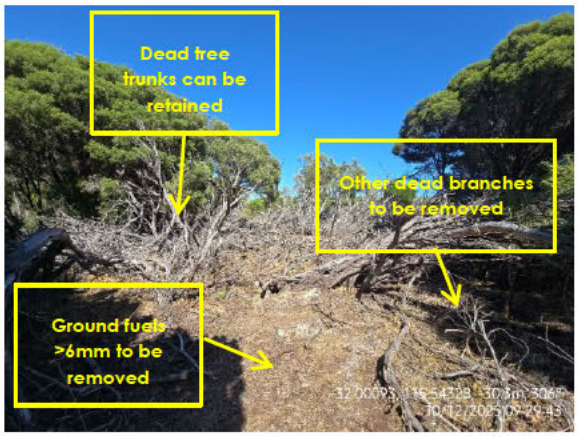
- Ground fuels – To be slashed and maintained to 100mm or less.

PHOTO ID: 2

PHOTO ID: 2 – Mark-up

WORKS REQUIRED ➡

- Ground fuels exceeding 6mm are to be removed.
- Dead tree trunks with branches exceeding 25mm (course/heavy fuel) can be retained for habitat.
- Large logs can be removed for the purposes of APZ implementation but can be placed back in the area for habitat.
- Other dead branches are to be removed.

<table>
<tr><th colspan="2">APZ – REMOVAL OF DEAD MATERIAL / RELOCATION & REPLACEMENT OF HABITAT
Within the defined APZ, the following works are required:</th></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 3</td><td>PHOTO ID: 3 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED</td><td>➢ Ground fuels exceeding 6mm are to be removed.
➢ Dead tree trunks with branches exceeding 25mm (course/heavy fuel) can be retained for habitat.
➢ Large logs can be removed for the purposes of APZ implementation but can be placed back in the area for habitat.
➢ Other dead branches are to be removed.</td></tr>
<tr><td>  </td><td> 
</td></tr>
<tr><td>PHOTO ID: 4</td><td>PHOTO ID: 4 – Mark-up</td></tr>
<tr><td>WORKS REQUIRED</td><td>➢ Ground fuels exceeding 6mm are to be removed.
➢ Dead tree trunks with branches exceeding 25mm (course/heavy fuel) can be retained for habitat.
➢ Other dead branches are to be removed.</td></tr>
</table>

APZ – REMOVAL OF DEAD MATERIAL / RELOCATION & REPLACEMENT OF HABITAT

Within the defined APZ, the following works are required:

PHOTO ID: 5

PHOTO ID: 5 – Mark-up

WORKS REQUIRED ➡

- Ground fuels exceeding 6mm are to be removed.
- Other dead branches are to be removed.

PHOTO ID: 6

PHOTO ID: 6 – Mark-up

WORKS REQUIRED ➡

- Ground fuels exceeding 6mm are to be removed.
- Other dead branches are to be removed.

APZ – REMOVAL OF DEAD MATERIAL / RELOCATION & REPLACEMENT OF HABITAT

Within the defined APZ, the following works are required:

PHOTO ID: 7	PHOTO ID: 7 – Mark-up
WORKS REQUIRED ➡	➢ Ground fuels exceeding 6mm are to be removed. ➢ Large logs can be removed for the purposes of APZ implementation but can be placed back in the area for habitat. ➢ Other dead branches are to be removed.

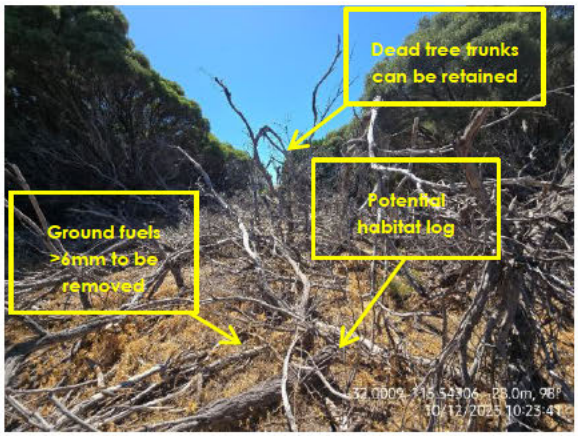


PHOTO ID: 8	PHOTO ID: 8 – Mark-up
WORKS REQUIRED ➡	➢ Ground fuels exceeding 6mm are to be removed. ➢ Dead tree trunks with branches exceeding 25mm (course/heavy fuel) can be retained for habitat. ➢ Other dead branches are to be removed.

APZ – REMOVAL OF DEAD MATERIAL / RELOCATION & REPLACEMENT OF HABITAT

Within the defined APZ, the following works are required:

PHOTO ID: 9

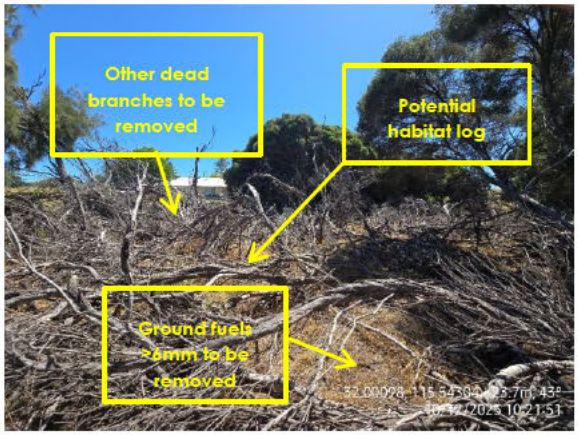


PHOTO ID: 9 – Mark-up

WORKS REQUIRED

- Ground fuels exceeding 6mm are to be removed.
- Large logs can be removed for the purposes of APZ implementation but can be placed back in the area for habitat.
- Other dead branches are to be removed.

PHOTO ID: 10

PHOTO ID: 10 – Mark-up

WORKS REQUIRED

- Wattles to be removed.
- Ground fuels exceeding 6mm are to be removed.
- Other dead branches are to be removed.

APZ – REMOVAL OF DEAD MATERIAL / RELOCATION & REPLACEMENT OF HABITAT

Within the defined APZ, the following works are required:

PHOTO ID: 11

PHOTO ID: 11 – Mark-up

WORKS REQUIRED ➡

- Ground fuels exceeding 6mm are to be removed.
- Other dead branches are to be removed.

PHOTO ID: 12

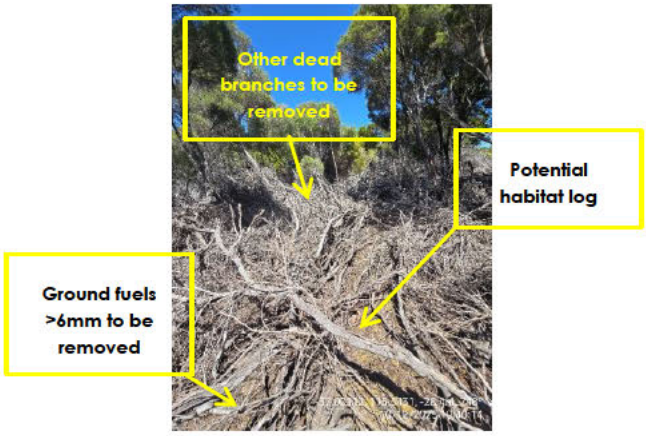


PHOTO ID: 12 – Mark-up

WORKS REQUIRED ➡

- Ground fuels exceeding 6mm are to be removed.
- Large logs can be removed for the purposes of APZ implementation but can be placed back in the area for habitat.
- Other dead branches are to be removed.

APZ – REMOVAL OF DEAD MATERIAL / RELOCATION & REPLACEMENT OF HABITAT

Within the defined APZ, the following works are required:

PHOTO ID: 13

PHOTO ID: 13 – Mark-up

WORKS REQUIRED ➡

- Ground fuels exceeding 6mm are to be removed.
- Other dead branches are to be removed.

PHOTO ID: 14

PHOTO ID: 14 – Mark-up

WORKS REQUIRED ➡

- Ground fuels exceeding 6mm are to be removed.
- Other dead branches are to be removed.

APZ – REMOVAL OF DEAD MATERIAL / RELOCATION & REPLACEMENT OF HABITAT

Within the defined APZ, the following works are required:

PHOTO ID: 15

PHOTO ID: 15 – Mark-up

WORKS REQUIRED ➡

- Other dead branches are to be removed.

PHOTO ID: 16

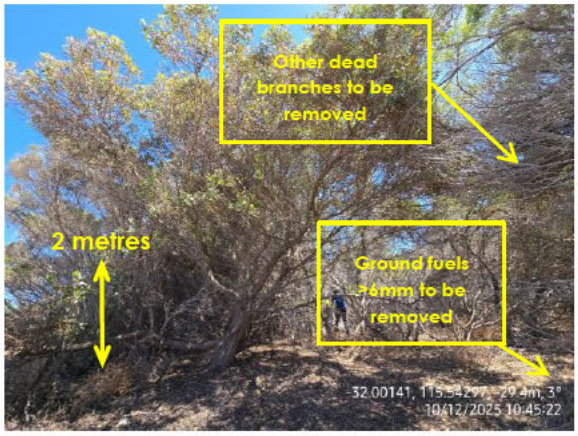


PHOTO ID: 16 – Mark-up

WORKS REQUIRED ➡

- Trees/Scrub (Coastal Moort) to be under-pruned to a height of two (2) metres above the ground.
- Ground fuels exceeding 6mm are to be removed.
- Other dead branches are to be removed.

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Figure 14

Asset Protection Zone Works - Significant Trees - Where Accessible to Obtain Suitable Imagery

Lot 10976 on Plan / Diagram: P216860
Point Parker Road
Rottnest Island
City of Cockburn

------ LEGEND ------

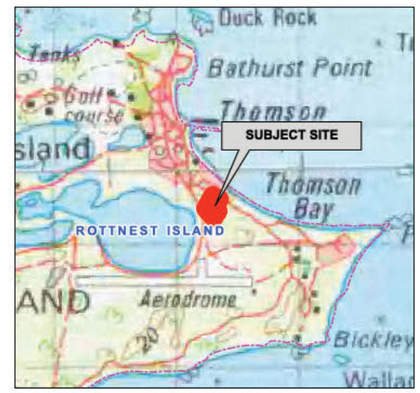
- Photo and Direction
- Surveyed Linework
- Asset Protection Zone / RIA Lease Area
- Vegetation Cells To be Retained
- Vegetation Removal Required Unavoidable
- Significant Trees Identified To be Retained
- Tree Removal Required Unavoidable
- Removal of Dead Material / Relocation & Replacement of Habitat
- Aboriginal Cultural Heritage Sites
- Subject Site

Master Plan - Revision L

- Central Facility
- Common Living
- 1 Bedroom
- 2 Bedrooms
- 3 Bedrooms
- 4 Bedrooms
- 6 Bedrooms
- 8 Bedrooms

0 10 20 30 40 50
Metres

------ LOCALITY ------



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: 08-01-2026
SCALE (A3): 1 : 250

BUSHFIRE PRONE PLANNING

APZ – SIGNIFICANT TREES (WHERE ACCESSIBLE) TO OBTAIN SUITABLE IMAGERY

Within the defined APZ, the following works are required:

PHOTO ID: 1

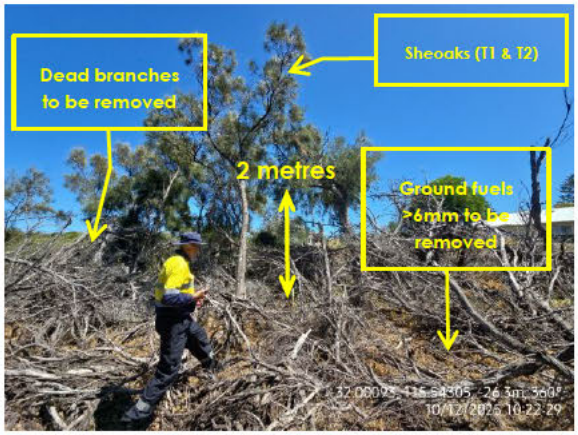


PHOTO ID: 1 – Mark-up

WORKS REQUIRED ➡

- Significant Trees (T1 & T2 – Sheoaks) to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed.
- Ground fuels exceeding 6mm are to be removed.

PHOTO ID: 2

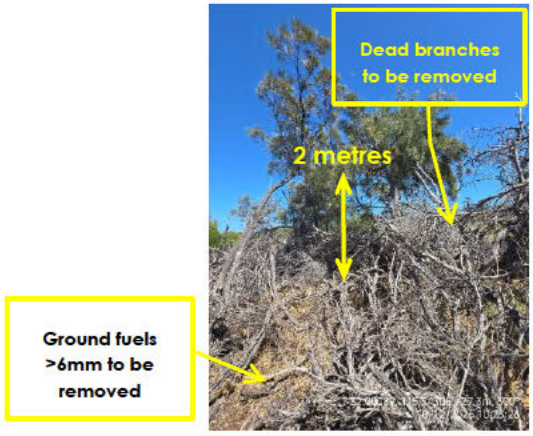


PHOTO ID: 2 – Mark-up

WORKS REQUIRED ➡

- Significant Trees (T1 & T2 – Sheoaks) to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed.
- Ground fuels exceeding 6mm are to be removed.

APZ – SIGNIFICANT TREES (WHERE ACCESSIBLE) TO OBTAIN SUITABLE IMAGERY

Within the defined APZ, the following works are required:

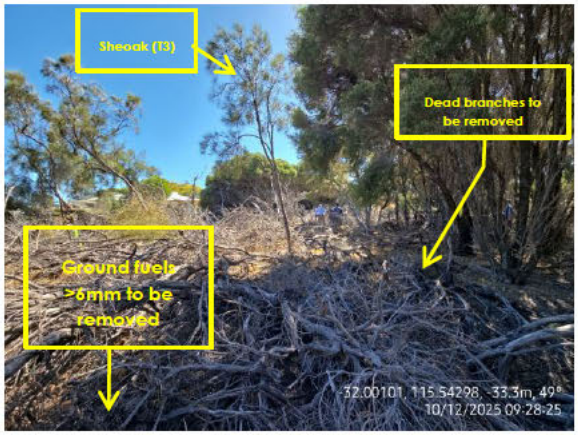


PHOTO ID: 3	PHOTO ID: 3 – Mark-up
WORKS REQUIRED ➡	➢ Dead branches are to be removed. ➢ Ground fuels exceeding 6mm are to be removed.

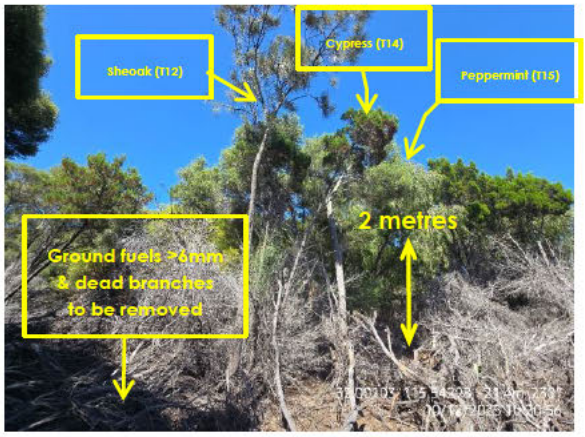


PHOTO ID: 4	PHOTO ID: 4 – Mark-up
WORKS REQUIRED ➡	➢ Significant Trees (T12 – Sheoak / T14 – Cypress / T15 - Peppermint) to be under-pruned to a height of two (2) metres above the ground. ➢ Dead branches are to be removed. ➢ Ground fuels exceeding 6mm are to be removed.

APZ – SIGNIFICANT TREES (WHERE ACCESSIBLE) TO OBTAIN SUITABLE IMAGERY

Within the defined APZ, the following works are required:

PHOTO ID: 5

PHOTO ID: 5 – Mark-up

WORKS REQUIRED ➡

- Significant Trees (T17 & T18 – Coastal Moort) to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed.
- Ground fuels exceeding 6mm are to be removed.
- *Note – Limited access to obtain suitable imagery*

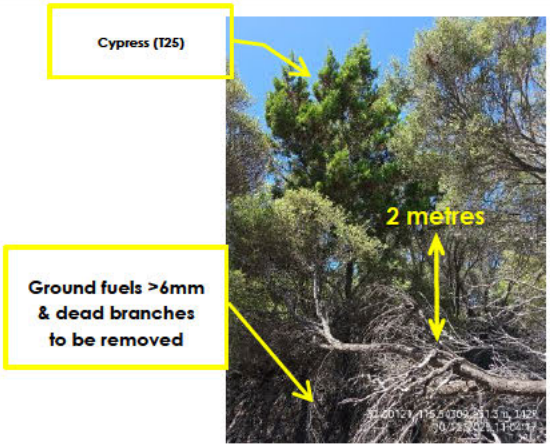


PHOTO ID: 6

PHOTO ID: 6 – Mark-up

WORKS REQUIRED ➡

- Significant Trees (T25 – Cypress) to be under-pruned to a height of two (2) metres above the ground.
- Dead branches are to be removed.
- Ground fuels exceeding 6mm are to be removed.
- *Note – Limited access to obtain suitable imagery. T22, T23, T24 & T26 (Cypress) located in the same vicinity.*

APZ – SIGNIFICANT TREES (WHERE ACCESSIBLE) TO OBTAIN SUITABLE IMAGERY

Within the defined APZ, the following works are required:

PHOTO ID: 7

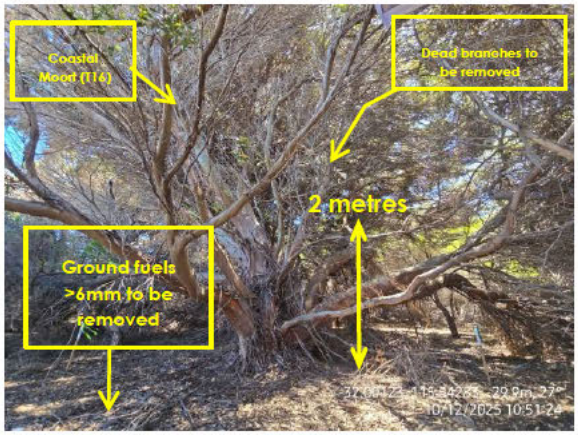
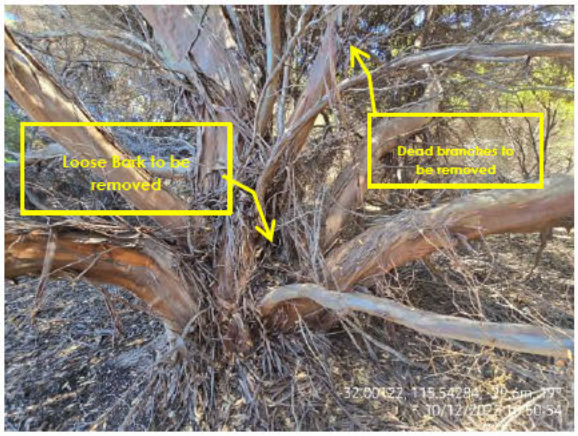


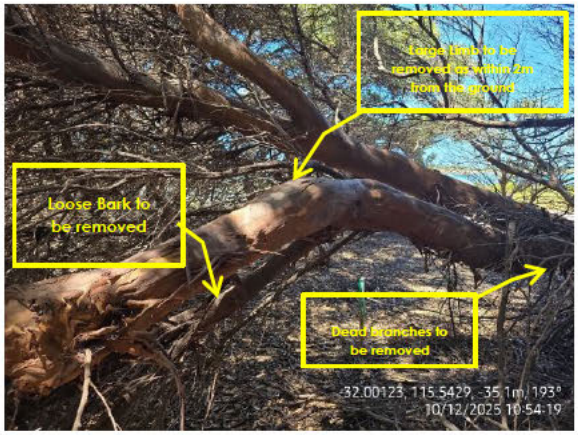
PHOTO ID: 3 – Mark-up

T16 Supplementary Photos (Not included on map)



Mark-up

T16 Supplementary Photos (Not included on map)



Mark-up

WORKS REQUIRED ➡	➢ Significant Tree (T16 – Coastal Moort) to be under-pruned to a height of two (2) metres above the ground. ➢ Dead branches are to be removed. ➢ Loose (Candle Stick Bark) to be removed. ➢ Ground fuels exceeding 6mm are to be removed.

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Existing, managed conditions on Rottnest Island – Vegetation excludable under s2.2.3.2 of AS3959-2018

Existing, managed conditions on Rottnest Island – Vegetation excludable under s2.2.3.2 of AS3959-2018

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ASSET PROTETION ZONE					
Implementation / Maintenance Action		Timing	Entity Responsible	Clearance	Comment
No.	Description				
1	**Implement Asset Protection Zone (APZ) as described in this Report**	Following Environmental and Development Approval - Then ongoing in Perpetuity	Custodian (Prendiville Group)	☐	
2	**Fine fuel load (combustible, dead vegetation matter less than 6 mm in thickness):** • Removal of all dead material (shrubs, grasses and leaf litter) • Weed control/removal	Prior to bushfire season – Then ongoing in Perpetuity	Custodian (Prendiville Group)	☐	
3	**Trees* (more than 6 m in height):** • Lower branches and loose bark to be removed to a height of two metres above the ground and/ or surface vegetation. • Tree canopies at maturity should be at least 5 m apart to avoid forming a continuous canopy. Stands of existing mature trees with interlocking canopies may be treated as an individual canopy provided the total canopy cover within the APZ does not exceed 15 per cent and is not connected to the tree canopy outside the APZ.	Prior to bushfire season – Then ongoing in Perpetuity	Custodian (Prendiville Group)	☐	
4	**Shrub* and scrub* (0.5 m to 6 m in height). Shrub and scrub more than 6 m in height are to be treated as trees.** • Canopy separation between vegetation cells to be increased to five (5) metres • Trees/Scrub within vegetation cells to be underpruned to a height of two (2) metres off the ground. o Vegetation within three (3) metres of a structure to be underpruned to 2.5 metres above the ground • Dead branches to be removed	Prior to bushfire season – Then ongoing in Perpetuity	Custodian (Prendiville Group)	☐	

5	**Ground cover*(less than 0.5 m in height. Ground cover more than 0.5 m in height is to be treated as shrub)** • Dead, felled branches are to be removed. • Ground fuels exceeding 6mm are to be removed.	Prior to bushfire season – Then ongoing in Perpetuity	Custodian (Prendiville Group)	☐	
6	**Grass** • To be slashed and maintained to 100mm or less.	Prior to bushfire season – Then ongoing in Perpetuity	Custodian (Prendiville Group)	☐	

ATTACHMENT 1: JBA SURVEY OF APZ AREA

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15009-210-F04-1.0.dwg

VER.	DATE	BY	AMENDMENTS	FILE SOURCE
1.0	11.12.2025	SW	Issued for Information	15009-210-5.0-11122025-PCG2020

Notes:
1. Heights established from SSM via GPS connection.

JBA SURVEYS

[redacted]

CLIENT:

HOTEL ROTTNEST

JOB NO: 15009-210 TITLE: VEGETATION SURVEY

PROJECT:
HOTEL ROTTNEST
STAFF ACCOMODATION DVELOPMENT
ROTTNEST ISLAND WA 6161

SURVEYOR: SW | DATE OF SURVEY: 10.12.2025 | DRAWN BY: SW | APPROVED BY: NRW

DATUM
VERT: AHD
HORIZ: PCG2020

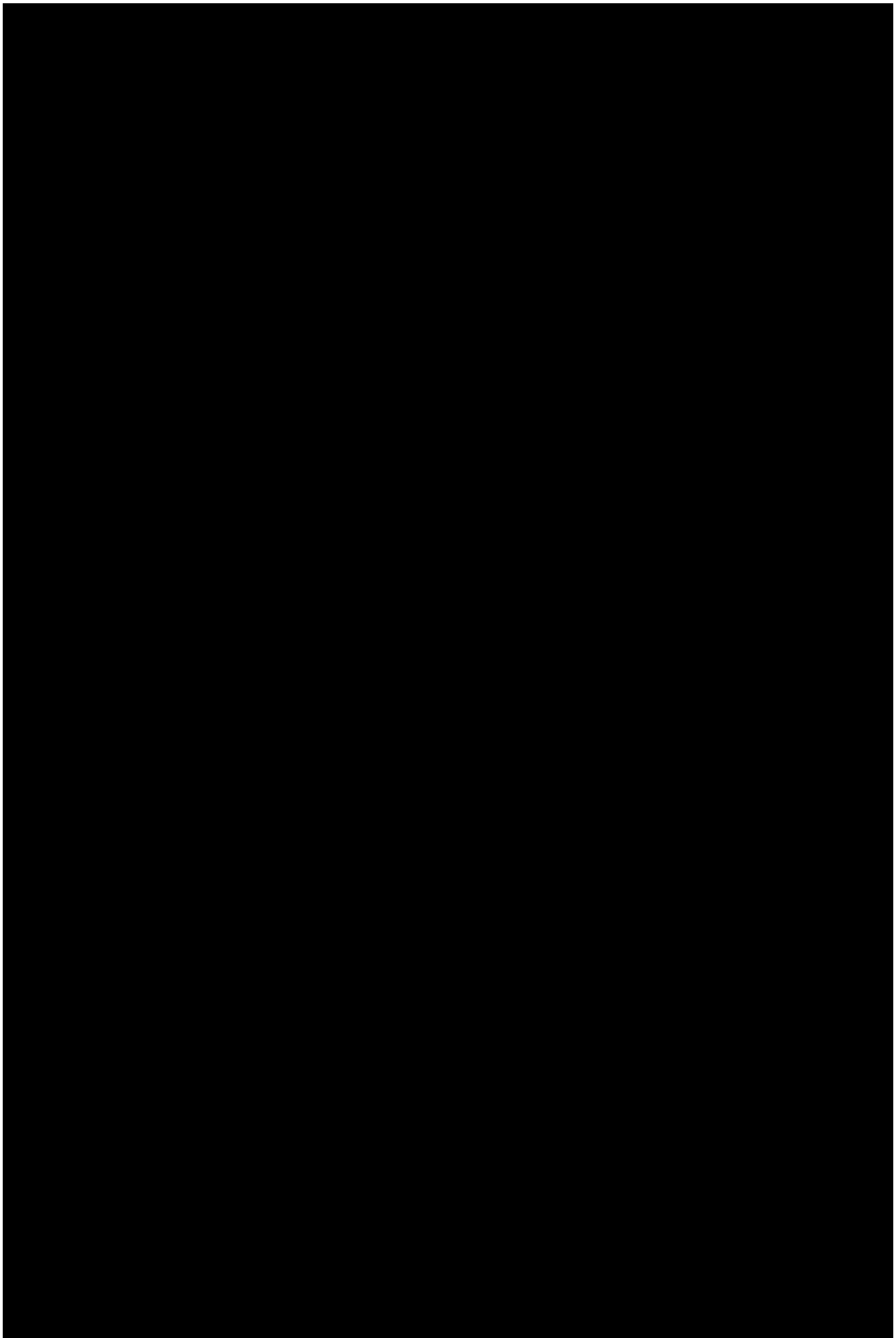
SCALE: 1:150

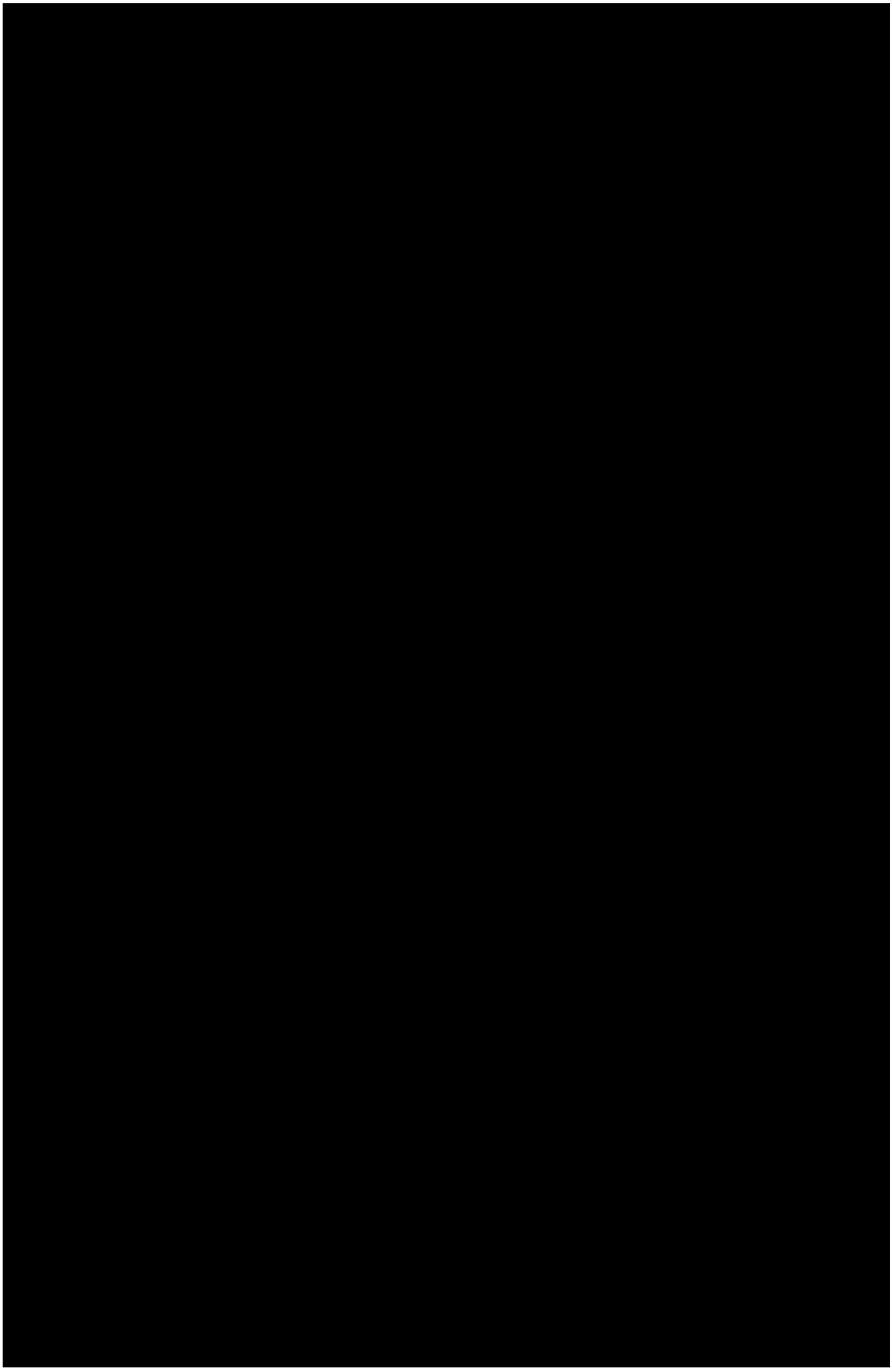
DWG NO: 15009-210-F04 VER: 1.0

SHEET NO: 1 OF 1 A1

N

Appendix B
Stakeholder consultation





Appendix C
Basic summary of records

Contaminated Sites Act 2003
Basic Summary of Records Search Response

Report generated at 09:21:14AM, 15/12/2025

Receipt No:

ID No: *39676*

Search Results

This response relates to a search request received for:

223 Mccallum Av
Rottnest Island, WA, 6161
That portion of Lot 10976 on Deposited Plan 216860 known as Subject A on Deposited Plan 72329, as shown on certificate of title LR3096/976, 223 McCallum Avenue, Rottnest Island WA 6161

This parcel belongs to a site that contains 1 parcel(s).

According to Department of Water and Environmental Regulation records, this land has been reported as a known or suspected contaminated site.

Address

223 Mccallum Av
Rottnest Island, WA, 6161
That portion of Lot 10976 on Deposited Plan 216860 known as Subject A on Deposited Plan 72329,

Parcel Status

Classification: 08/09/2011 - *Remediated for restricted use*

Nature and Extent of Contamination:

Hydrocarbons (such as from petrol or diesel) are present in groundwater beneath the site.

Restrictions on Use:

The land use of the site is restricted to recreational open space and public roads. Enclosed buildings should not be constructed on the site without further contamination assessment and/or remediation.

Due to the presence of hydrocarbons in superficial groundwater, a site-specific health and safety plan is required to address the risks to the health of any workers undertaking intrusive works below 2m depth until further notice.

Groundwater within the superficial water table is not suitable for use without treatment for the presence of hydrocarbon contamination.

Reason for Classification:

This site was originally reported to the Department of Environment and Conservation (DEC) prior to the commencement of the 'Contaminated Sites Act 2003', and was reported again as per reporting obligations under section 11 of the Act in May 2007. The site classification is based on technical information submitted to DEC by July 2011.

The site is part of the Rottnest Island settlement area, and is currently used for public open space and roads.

The site was reported because a fuel leak was detected from an underground fuel storage tank (UST) in 1997, and because a series of contamination investigations between 1997 and 2007 found hydrocarbons (such as from petrol or diesel) in groundwater.

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Two contamination assessments were initially carried out in 1997, following a report that a diesel leak had occurred from underground fuel infrastructure (storage tanks and/or pipelines). These assessments, which were limited to groundwater investigations, found that phase-separated hydrocarbons (PSH) (such as pure petrol or diesel) were floating on the surface of the groundwater.

Active remedial works, comprising a PSH recovery system (to 'skim' PSH from the surface of the groundwater), were undertaken in December 1997. An 'enhancement trench' (which is a trench containing high permeability material, such as gravel) was also installed to attempt to increase recovery. These works were ceased in January 1998 when no further PSH could be recovered.

Groundwater monitoring in November 1998 found that PSH (such as pure petrol/diesel) remained floating on the surface of the groundwater.

Groundwater monitoring continued to be undertaken on a quarterly to annual basis between November 1998 and July 2005, with an additional sampling event in February 2007. During this period, hydrocarbons continued to be detected in groundwater, but concentrations were observed to decrease. By December 2004, the concentration of dissolved-phase hydrocarbons in groundwater had reduced to a level that indicated that PSH was no longer present at the site (i.e. petroleum hydrocarbons did not appear to be floating on top of the water table).

The most recent monitoring round in March 2007 found that hydrocarbons (such as from petrol or diesel) were present in groundwater at the centre of the plume at concentrations exceeding Aquatic Ecosystems - Marine guidelines, as published in 'Assessment Levels for Soil, Sediment and Water' (DEC, 2010) (marine water guidelines), which is the relevant assessment level for the protection of marine ecosystems. These guidelines are relevant because Thomson Bay is located immediately to the east of the site.

Three groundwater bores were installed along the coast, between the centre of the groundwater plume area and the nearby marine environment (Thomson Bay). These groundwater bores were sampled from quarterly to annually between June 1999 and July 2005. Hydrocarbons were occasionally present in groundwater at concentrations exceeding marine water guidelines (DEC, 2010); however, these concentrations were observed to decrease over time. By July 2005, no contaminants were present in two of these bores, and by February 2007, all contaminants in the remaining 'coastal' groundwater bore had reduced to levels below marine water guidelines (DEC, 2010).

Marine water in Thomson Bay has been sampled on 15 occasions between August 2000 and July 2005, and in the majority of these sampling events no contaminants were detected. Minor concentrations of hydrocarbons (such as from petrol or diesel) were detected during three sampling events in June 2002, June 2004 and December 2004. However, contaminants have never been detected in Thomson Bay at concentrations exceeding marine water guidelines (DEC, 2010).

An intermediate health risk assessment and a screening ecological risk assessment were undertaken for the site in May 2003. The risk assessment works found that the contamination present on the site did not pose an unacceptable risk to human health, the environment or environmental values under the land use at the time: however, further monitoring was required to determine whether the extent of the groundwater plume was increasing.

A detailed health risk assessment and another screening ecological risk assessment were undertaken in May 2008, after further groundwater monitoring had been conducted.

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The screening ecological risk assessment undertaken in May 2008 found that as hydrocarbons have never been detected in Thomson Bay at concentrations exceeding marine water guidelines, and as the extent of the groundwater plume is well delineated and has been shown to be stable or decreasing in size, the levels of hydrocarbons present in groundwater beneath the site do not pose an unacceptable risk to the environment or any environmental value under any land use.

A detailed health risk assessment (HRA) was undertaken in May 2008. The HRA has indicated that the contamination present on the site has attenuated to a level that does not pose an unacceptable risk to human health under the current and proposed land use (public open space). However, the HRA found that vapour gas intrusion has the potential to create unacceptable odours or pose a risk to the health of building occupants, and therefore the site may not be suitable for the construction of enclosed buildings. A site-specific health and safety plan should also be developed to manage potential risks to construction workers during any excavations (e.g. by limiting or avoiding exposure to contaminated groundwater).

Further contamination assessment was conducted in February 2009 in accordance with the guideline "Use of Monitored Natural Attenuation for Groundwater Remediation" (Department of Environment, April 2004), to determine whether Monitored Natural Attenuation (MNA) was a viable strategy to remediate the site such that it was suitable for any land use. This assessment indicated that natural attenuation had been occurring at the site (e.g. contaminants were being degraded, the concentrations of contaminants were decreasing, and the size of the plume was stable or decreasing). On this basis, the assessment found that MNA was a viable remedial strategy. However, groundwater plume modelling indicated that MNA could take several decades to reduce contaminants to levels such that the site was suitable for any land use.

The investigations and risk assessment works were the subject of an independent review by an accredited Contaminated Sites Auditor who provided a Voluntary Auditor's Report (VAR) dated June 2011. The VAR recommended that the site is suitable for public open space and public roads, but that it may not be suitable for the construction of enclosed buildings. DEC and the Department of Health accept the findings of the VAR.

As the site is contaminated and has been remediated such that it is suitable for public open space and public roads, but may not be suitable for the construction of enclosed buildings, the site is classified as 'remediated for restricted use'.

Periodic monitoring of groundwater is required on an ongoing basis to confirm that the groundwater plume remains stable and/or continues to decrease.

The site is also subject to ongoing management under the Rottnest Island Management Plan, which is a requirement of the 'Rottnest Island Authority Act 1987'.

DEC, in consultation with the Department of Health, has classified this site based on the information available to DEC at the time of classification. It is acknowledged that the contamination status of the site may have changed since the information was collated and/or submitted to DEC, and as such, the usefulness of this information may be limited.

Certificate of Title Memorial

Under the Contaminated Sites Act 2003, this site has been classified as "remediated for restricted use". For further information on the contamination status of this site, please contact the Contaminated Sites Branch of the Department of Environment & Conservation.

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Current Regulatory Notice Issued	**Type of Regulatory Notice:** *Nil* **Date Issued:** *Nil*
General	No other information relating to this parcel.