



Mr Joel Loiaconi  
 Orchard Property Group  
 PO Box 9094  
 GCMC 9726

23 November 2022

Dear Joel

**RE: Bushfire Hazard Assessment**  
**393 Caboolture River Road, Upper Caboolture, Qld 4510**  
**Lot 34 on RP115959**

We note your request to provide a Bushfire Hazard and Attack Level Assessment for site of the proposed subdivision of Lot 34 on RP115959 ("the Subject Lot").

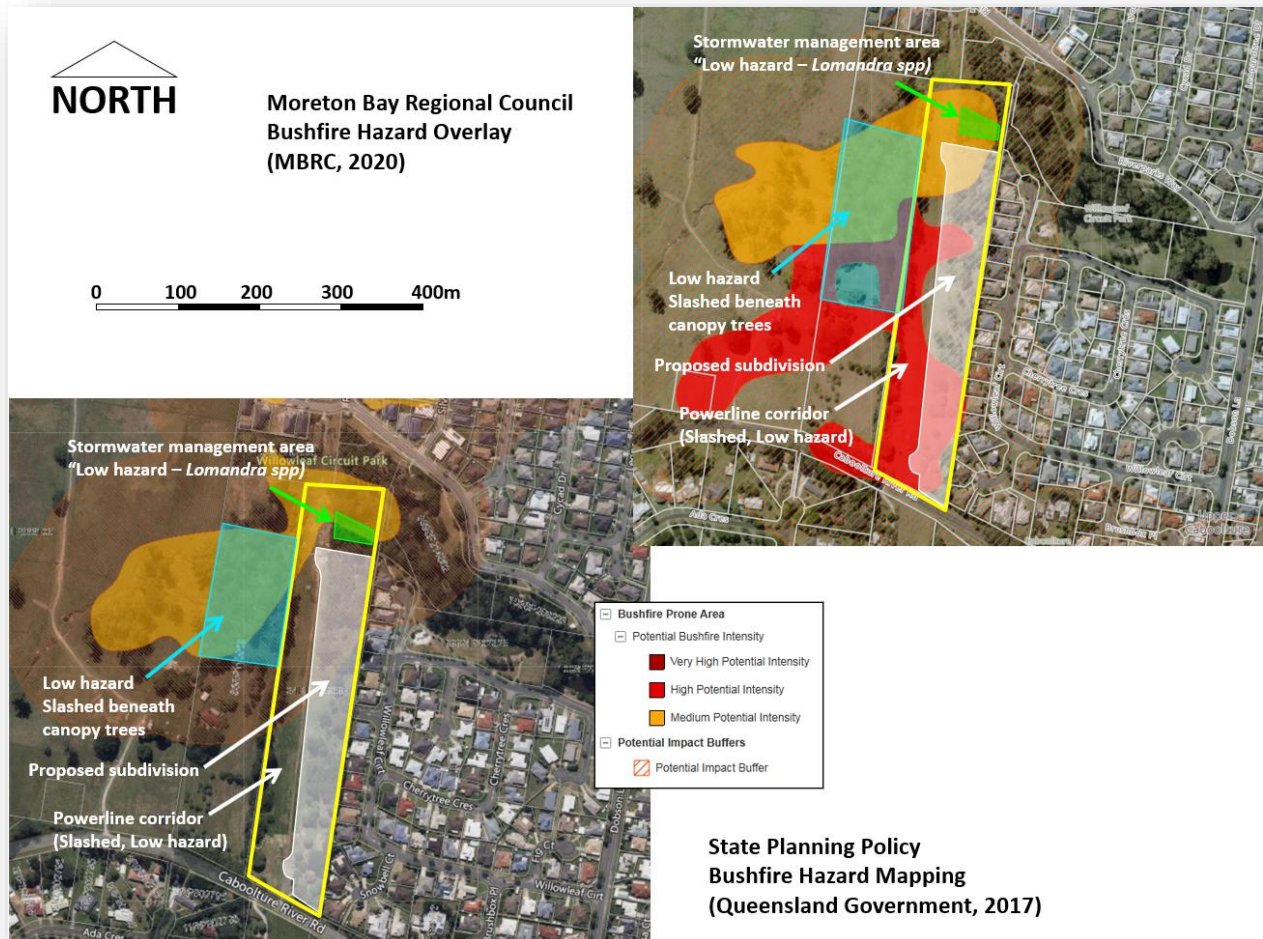


Figure 1. Designation of bushfire prone land (MBRC, 2020 and State Government, 2017)

We note that the site of the proposed subdivision is designated as “bushfire prone area” (BPA) by the Moreton Bay Regional Council (MBRC) bushfire hazard overlay, and State government. If this designation is substantiated, there are two main planning implications from a bushfire perspective:

1. Council would expect a supporting Bushfire Management Plan (BMP) to be provided which demonstrates compliance with Council’s Bushfire Hazard Overlay Code; and
2. The Building Code of Australia has functional performance requirements to be met for Class 1, 2 and 3 buildings and associated Class 10a structures with the relevant Standard (AS3959-2018 *Construction of buildings in bushfire prone areas*) providing Deemed To Satisfy construction requirements.

In terms of Section 7 of Building Regulation 2021, it is Local Government that designates whether or not an area is a BPA, however this designation is subject to site assessment and validation by suitably qualified and experienced bushfire practitioners.

MBRC bushfire hazard mapping is based on the same methodology used by State Government, as outlined in *A new methodology for State-wide mapping of bushfire prone areas in Queensland* (CSIRO 2014). Differences in certain settings such as foliage projective cover result in mapping variation as seen in Figure 1. Neither set of mapping claims to be perfect and both are subject to ground validation by suitably qualified and experienced bushfire practitioners.

Site assessment on 26 May, 2022 investigated the land within 200m of the site and established that the closest area of designated BPA to the west of the site is in fact routinely maintained in a Low hazard state by slashing beneath canopy trees.

The proposed subdivision will remove a corridor of vegetation which is currently unmanaged, leaving only a very small and narrow fragment of unmanaged riparian vegetation along the waterway in the northernmost section of the Subject Lot, abutting the drainage reserve.

The drainage reserve of 6919m<sup>2</sup> includes an area of 1200m<sup>2</sup> for a Stormwater Management Area, to be thickly planted out to high-leaf-moisture, fire resisting species (*Lomandra spp*, *Liriope spp*). This leaves a “patch” of approximately 5700m<sup>2</sup> of future unmanaged native vegetation.

The *Bushfire Resilient Communities – Technical reference Guide*” (October 2019) deals with small patches and corridors of vegetation in Section 4.2.6 where:

*Step 1 removes sub-hectare areas of continuous fuel that are more than 100m from any other areas of continuous fuel greater than 2 hectares.*

*Step 3 removes narrow corridors of continuous fuel < 50 metres in width, which is certainly the case with the waterway, which is also fragmented by the wet or inundated waterbed as evidenced in Figure 2.*



**Figure 2. Narrow strips of vegetation less than 20m wide either side of waterway.**

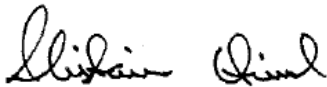
In this way the “patch and corridor filtering” process applied in the bushfire hazard mapping methodology above would downgrade such small and narrow areas as “Low hazard” based on their inability to allow fire to build to any significant intensity.

With the closest edge of vegetation that could be classifiable as BPA being more than 100m from the Subject Lot this places the site beyond the potential bushfire impact buffer applied by this methodology. Therefore the assigned bushfire hazard for the site is Low Hazard and there should be no requirement for a supporting BMP, nor any need to comply with AS3959-2018.

Even if AS3959-2018 was to be applied, under Exclusions 2.2.3.2.a to f for “Low Threat Vegetation”, a BAL-LOW condition exists.

Thank you for the opportunity to be of assistance.

Yours sincerely



**Alistair Hill**

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