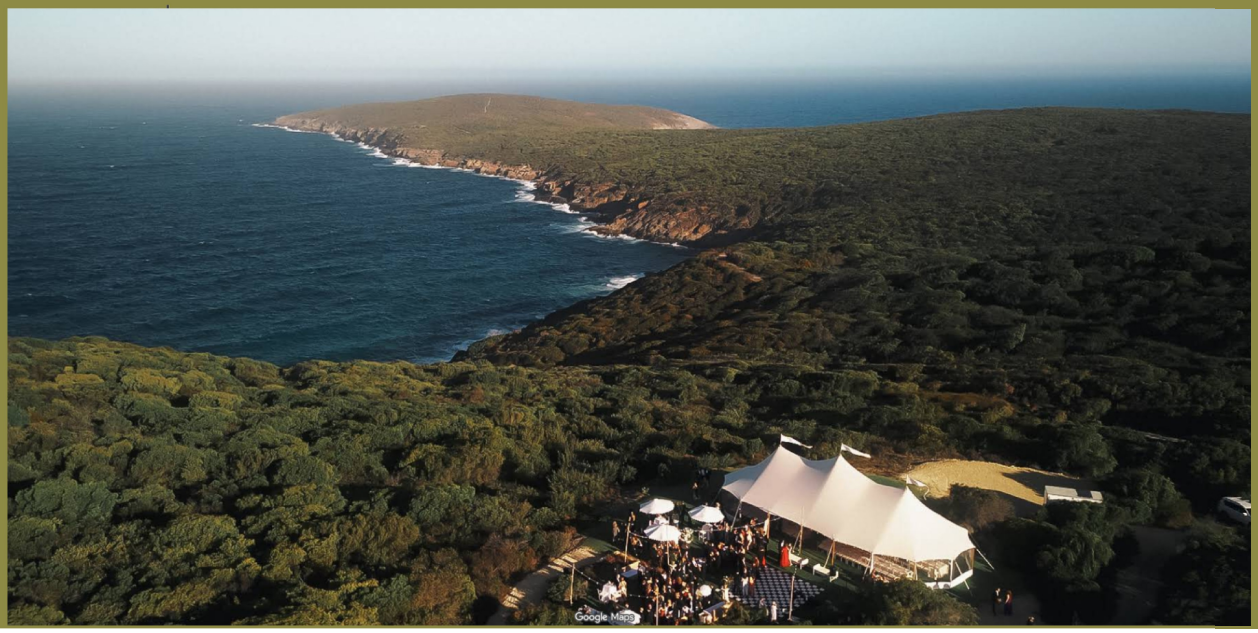
DEVELOPMENT APPLICATION FOR PROPOSED WEDDINGS & SHORT-STAY ACCOMMODATION NO. 43 HORSE HILL RD, BREMER BAY



TOWN PLANNING REPORT

16 JULY 2026



Planning Outcomes WA
town planning, urban design, landscaping + appeals

Tourism Council Western Australia

Document Reference, Copyright & Disclaimer

Prepared for:	Salt Cove Bremer Bay Weddings
Prepared by:	MNS
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Version:	B
Job No.:	43HorseHill/SAT1

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PART 1 – INTRODUCTION

Background

Previously, a homestead and shed were constructed on the Subject Site in a rural setting, which has been found to be exempt under the Planning Regulations.

The Baum family have lived and worked in this district for 43 years, and bought the Site in 2022. The tourism experience of the Site and township will therefore have a deeper story and greater meaning to patrons, and enable the family to continue their legacy and residence on the property and in the district.

In 2023, planning approval was granted by the Shire of Jerramungup for Ancillary and Workers Accommodation of 200m^2.

Purpose of this Report

This report has been prepared to analyse development opportunities and constraints of the Site, to support a Development Application for weddings and short-stay accommodation with signage.

This report has also considered the findings of specialist reports on soils and wastewater, transport, and bushfire.

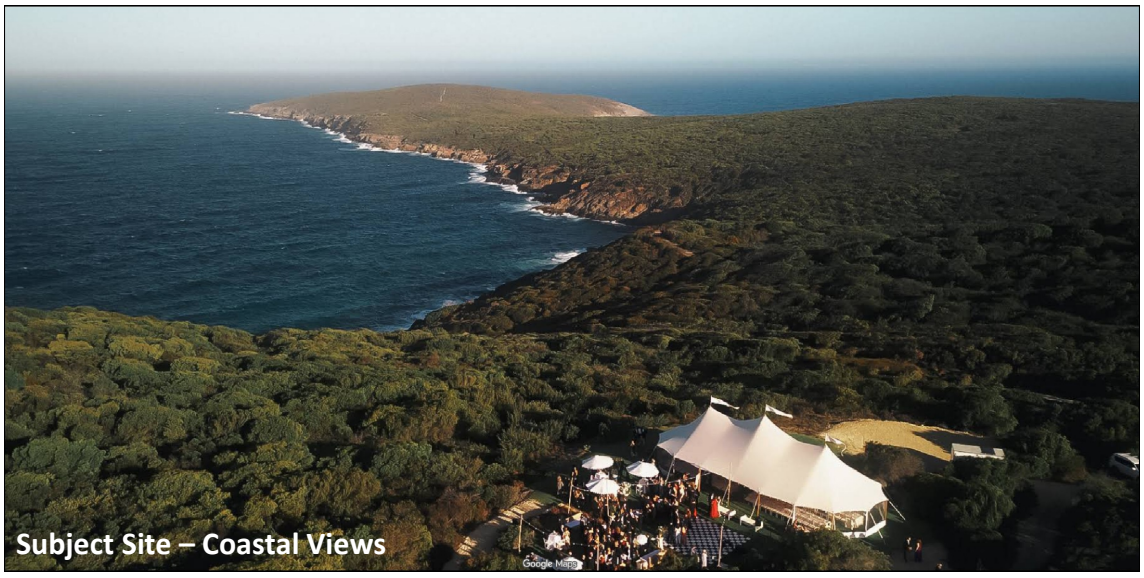
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PART 2 – SITE & CONTEXT

2.1 Property Description & Location

Subject Site			
Address	**Vol./Fol.**	**Area**	**Landowner(s)**
No. 43 (Lot 112) Horse Hill Road, Bremer Bay	1423/595	404,922m^2 *40ha. / 100ac.*	I & B Baum

The Subject Site is located on Horse Hill Road within the rural-residential-character locality of Bremer Bay, south of the town centre (**Appendix D1**), in the Shire of Jerramungup (**Shire**) Local Government Area. The Site has a considerable 100 acres of land, and there are no encumbrances listed on the Certificate of Title (Landgate search).



Subject Site – Coastal Views

2.2 Regional & District Context

The Site is located within the Great Southern Region, which is rich in natural beauty and history. Its geology is dominated by granite massifs and outcrops, numerous bays with white sandy beaches, and extensive open spaces with native vegetation.

The Site is located within proximity to the following features (**Appendix D1**):

- Perth – 510km / 5.7hr (by road);
- Albany – 190km / 2.1hr;
- Jerramungup – 90km / 1.1hr;
- Bremer Bay – 10km / 10min;
- Numerous National Parks;

- Indian Ocean – Views, whale-watching visible onsite, fishing and swimming; and
- Southern WA – Regional tourist destination and journey.

For nature-based tourism, the district offers a large number of national parks and reserves within a short drive. Historical tourism includes dozens of shipwrecks from as far back as 1842, and 178 years of whaling. Other tourism business in the locality includes Beaches Resort Tourist Park.

2.3 Local & Site Context

The locality features rocky coastline, beaches, low-open forest, woodland, shrubland, thicket, and many houses.

The Site has a large 100 acres of land, with sloping ground levels, limestone ridges and large open spaces, with a moderate grade (60 metres from west to east over a distance of 1km); and currently featuring a house and shed (**Appendix D2**).

Existing vegetation onsite features low-open forest and shrubland comprising of Victorian tea tree, Peppermint, grevillea, mallee, and grasses, as detailed in the Bushfire Management Plan (**Appendix C**).

Regarding fauna, the property is not stocked with animals, and no wildlife has been observed onsite other than transitory birds.

PART 3 – PLANNING FRAMEWORK

3.1 Federal Legislation

The Shire and others produced the Vegetation Behaviours & Management at Bremer Bay & Pt Henry 2016 (**Veg Mgt Study**), which reveals the presence of the Proteaceous Kwongkan plant family on the Site which are classed as a Threatened or Endangered Community (**TEC**) in the federal *Environmental Protection & Biodiversity Conservation Act 1999* (**EPBC Act**).

3.2 State Legislation, Regulation & Policy

Noise generated onsite impacting 'noise sensitive premises' offsite (e.g. residences) needs to comply with acoustic levels in the *Environmental Protection (Noise) Regulations 1997* (**Noise Reg's**). The locality has a mixed character which includes a small number of sensitive houses, with the closest to the north at a considerable distance of 365m. We also note the contours in the locality feature a ridgeline and small rise between the wedding venue and the closest dwellings.

As the proposal is for a wedding venue with a small number of structures and activities, it is reasonably foreseeable that neighbouring dwellings would not be impacted by noise, and this application will comply with the Noise Reg's, and therefore an Acoustic Report has not been prepared.

With regard to liquor licensing, liquor is controlled by the Department of Local Government, Sport, Gaming & Liquor (**DLGSGL**), not Local Government, under separate legislation. If required, it will include an application with certificates from the Shire that all works have been approved (past-tense), and inspection of constructed works by the DLGSGL, after DA approval.

Furthermore, advice previously obtained from the DLGSGL confirmed that a liquor licence is not required without the sale or supply of alcohol by the proponent.

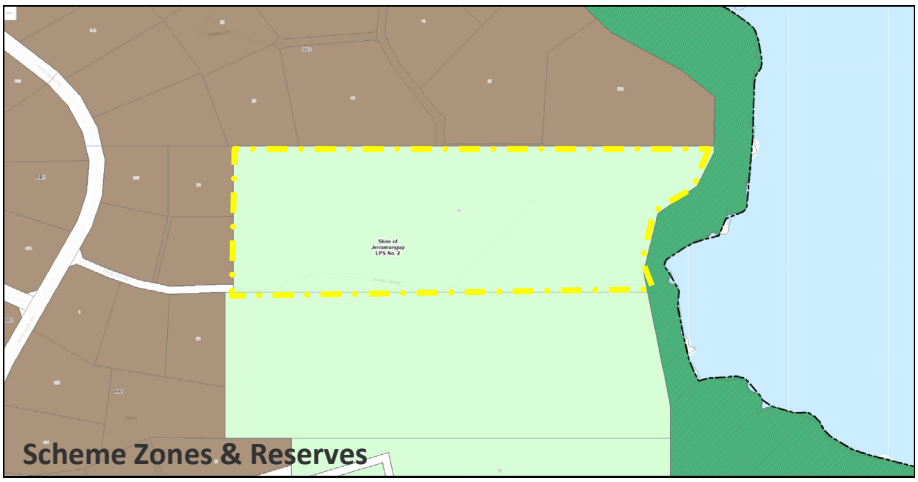
The following State Planning Policies are relevant to this project - SPP3.7 Bushfire (**Bushfire Policy**).

3.3 Local Planning Scheme & Policy

Planning Scheme

At a local level, the Site is zoned Rural under the Shire's Local Planning Scheme No. 2 (**Scheme**), in a semi-rural-character locality noting the following zones, reserves and uses within the focus area (**Appendix D2**).

Local Zones & Uses within Focus Area		
Direction	**Zoning**	**Land-Use**
North	Abuts a Rural-Residential zone	Single Houses
West		
South	Abuts a Rural zone	Vacant land
East	Abuts a Recreation & Open Space reserve	Foreshore reserve



Planning Policy

The Shire also has the following relevant Local Planning Policies:

- LPP4 Signs (**Signs Policy**).
- LPP5 Reflective Materials Policy (**Reflective Materials Policy**).
- LPP6 Tourist Accommodation (**Tourist Accommodation Policy**).
- LPP16 Outbuildings (**Outbuildings Policy**).
- LPP18 Pt Henry Fire Mgt (**Pt Henry Fire Policy**) – Refers only to land zoned Rural Residential, whereas the Site is zoned Rural.

3.4 Other Considerations

The locality and Site is not listed as a heritage site (local / state / aboriginal).

A food business licence is not required for mobile food vans and trucks.

PART 4 – PROPOSED DEVELOPMENT

4.1 Glamping Story

Recent market research on tourism has demonstrated that there is currently strong demand in WA and Australia for unique/quirky accommodation options and specifically glamping, for an average of 3.2 nights, with evidence of repeat customers (Smitherman Consultants 2021).

Whilst 'glamping' has its roots in the simplicity of camping but with conventional amenities (i.e. glamorous-camping), the 'wabi' eco-tents are similar to conventional chalets but with a paired-back and minimalist design, inline with the Japanese wabi-sabi concept (**Appendix D4**):

> Wabi has its root in Zen Buddhism and refers to the bitter-sweet pleasure of being alone, the serenity that comes from detaching yourself from society, and its endless striving for wealth and status.



Glamping Tents

The theme of the proposed development is a fresh and alternative experience for couples only in short-stay glamping, designed with simplicity to promote down-time and introspection ('sabi'). Individual units have also been spatially separated for visual and audio privacy and to be aesthetically sympathetic to the countryside; whilst the ecological qualities of the products are explained in a below section.

The theme and chosen design therefore responds to the demand for uniqueness revealed in market research.

4.2 Overview & Operational Details

Overview

The proposed development is is considered to be low-impact and outlined as:

- **Ceremony / Reception** Marquee – Wedding ceremonies (Reception Centre) trading as Salt Cove, reception / dining and dance floor with DJ; max. 1 booking per day (150m^2-300m^2).
- **Car-Parking** – Marked greater than Australian Standards, bays (inc. disabled) x 58.
- **Bus Parking** – Bus bay marked to Australian Standards, for a standard vehicle (oversized for SRV coaster buses), wide manoeuvring, footpath access.
- **Toilet Block** – Demountable, 34m^2.
- **Food & Alcohol** – Mobile food vans / trucks.
- **Accommodation** – Eco-tents for short-stay tourist accommodation (Tourist Accommodation), for 2-4 adults / children (43m^2) x 10.
- **Footpaths** – Throughout, to be accessible for disabled guests where required.
- **Pergolas** – Outdoor space (10m^2) x 2.
- **Entry Statement** – Entry statement (2 pieces), rural theme, non-illuminated, site-specific advertising to guide traffic onsite.

Operational Details

The proposed operational details of the business are as follows, which is considered to be low-impact:

- **Wedding Events** (September-November, February-April) – 1 per week.
- **Wedding Guests** – 120 adults/children maximum, typically 100 (including accommodated).
- **Wedding Hours** (Friday-Sunday) – 12:00-noon - 12:00-midnight, elderly guests and families with young children begin departing from 9pm.
- **Wellness Events** (December-January) – 1 per week outside of wedding season.
- **Accommodation Bookings** – 2-6 nights (short-stay).
- **Management** – Onsite in the existing homestead.
- **Workers Accommodation** – Existing.
- **Accommodation Staffing** – 2 employees / contractors.
- **Deliveries** – 4-5 per week.

Existing Exempt Development

The property has recently been purchased by the Client, and it is suspected that some development is not reflected in documents from the Shire. It is not known when these structures were constructed, if they were exempt from planning approval at the time, or if prior advice was sought from the City. Accordingly, it is considered a suitable time to formally claim exemption from planning approval in accordance with the Deemed Provisions for:

- **Single House** – Homestead (170m^2).
- **Shed** – Converted to fire shelter, 12m x 18m (216m^2).

4.3 Utilities & Infrastructure

The Site has limited access to public utilities, being power, telecommunications and solid waste collection, as shown on the Master Plan (**Attachment D3**). As a result, various private services are proposed to sustain proposed activities and human habitation:

- **Potable Water** – Sites will be supplied with water tanks, to be pumped / gravity-fed rainwater, and topped-up by carted water (if required).
- **Kitchens & Bathrooms** – All eco-tents will have kitchenettes including a bar-fridge, microwave oven, plates, glasses and cutlery; and fully fitted-out bathrooms designed and constructed offsite to a luxurious standard.



Bathroom Pod – Medium Size

- **Wedding Toilets** – A toilet block is proposed with 10 toilets, being 5 male stalls, 4 female stalls, 1 unisex disabled stall, and all stalls with hand basins. Also, toilets are required under liquor licencing at a rate of 1 per 25 consumers of alcohol, which could permit a future licence of 250 patrons and therefore the proposal would comply.
- **Effluent Disposal** – Effluent systems will not be within proximity (100m) of a drinking-water source. A Site Classification Report has been completed and Aerobic Treatment Units (ATUs) are proposed to minimise the risk of ground water contamination (Appendix A), with technical details of the systems subject to conditional approval (the satisfaction of the Shire), calculated and documented in the forthcoming Building Permit (by others) as per the Effluent Policy.
- **Solid Waste** – Rooms will be cleaned on a regular basis by a family member, caretaker or a local cleaning service, including the collection of solid waste, which will be accumulated in a $3m^2$ skip bin near the shed, serviced by an onsite waste collection service from a local contractor.

Accordingly, available utilities and private services provide suitable environmental health to support the proposed development.

4.4 Land-Uses & Zone Objectives

The proposal is considered to clearly meet the Scheme land-use definition of a Use Not Listed '**Reception Centre**', which has an 'A' use code:

> means premises used for functions on formal or ceremonial occasions but not for unhosted use for general entertainment purposes ;

The proposal is considered to clearly meet the Scheme use definition of '**Tourist Accommodation**', which has a 'D' use code:

> means accommodation specifically catering for tourists and includes bed and breakfast accommodation, chalets, farmstay, guesthouses, caravan parks, etc. but does not include hotels, or motels;

As the proposal is listed as an advertised-discretionary and discretionary uses, zone objectives are considered to be met as shown below.

Rural Zone Objectives (Cl. 4.2)		
Objectives	**Response**	**Complies?**
To ensure the continuation of broad-hectare farming as the principal land use in the district and encouraging where appropriate the retention and expansion of agricultural activities where the land is capable of such development.	Agricultural uses are not viable with the lot size, soil condition, and damaging winds. Available views and the medium size of the lot is more conducive with tourism development.	Yes
To allow for facilities for tourists and travellers, and for recreation uses.	Short-stay accommodation is proposed.	Yes
To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment.	The availability of tourist accommodation in the district and locality is limited. Environmental concerns are negated through the analysis on the Shire's Veg Mgt Study and designing outside of TEC areas. Furthermore, the eco-tents do not required clearing for an APZ, and their construction is minimalistic with proprietary 'eco-anchors' and subfloor.	Yes
To help protect rural land from land degradation and further loss of biodiversity by: • minimising clearing of remnant vegetation • encouraging retention and protection of remnant vegetation • encouraging development and protection of vegetation corridors • encouraging development of sustainable surface and sub-surface drainage works • encouraging rehabilitation of salt-affected land • encouraging soil conservation through land management measures		Yes

• encouraging identification and protection of wetlands		
To promote the sustainable management of natural resources, and the prevention of land degradation.		Yes

Also, it is understood that advertising will be required for a period of 14 days due to the use permissibility code. The Applicant's responses to submissions and the officer's comments are found in the Schedule of Submissions (**Appendix E**).

4.5 Environmental Considerations

The Veg Mgt Study identifies the Site as having the following vegetation communities and conservation ratings:

- Proteaceous Kwongkan & Agnis flecuosa (**PKAf**) Diverse plant family and Peppermints – Uncommon and TEC (federally protected status in the EPBC Act).
- Agonis flexuosa Shrubland (**AfS**) Peppermints – Common and secure (not protected).
- Leptospermum laevigatum Shrubland (**LlS**) Victorian tea tree – Common and weed-dominated (not protected).

In response, the PKAf vegetation community has been mapped on the Master Plan and the proposal is outside of this area. In addition, eco-tents do not need APZs, and the proposed development does not require clearing of vegetation.

Accordingly, we have not commissioned an environmental report on the basis that it is reasonably foreseeable that it will not provide additional substantive information.

4.6 Bushfire Considerations

A BMP and BEP were commissioned as required by the Bushfire Policy, which did not reveal any barriers to development, and in summary found (**Appendix C**):

- Eco-tents with Asset Protection Zones (**APZs**) not being required as they are a 'tolerable risk'.
- BCA Class 10b for the shed (N/A).
- Assessment Summary – The proposed development/use achieves the intent of all the elements and acceptable solutions by being fully compliant or not applicable.
- The Bushfire Emergency Plan assists persons to conduct operations that are directed at managing and protecting persons and property from the risks associated with a bushfire event. It is constructed to be used as an operational document that facilitates the reliable implementation of required actions at different times of the year, including during the urgent and high pressure conditions of a bushfire event.

4.7 Water Considerations

A series of water issues were raised and documents were commissioned to ameliorate impacts (**Appendix A**):

- Soil Classification Report – Previously approved systems in 2025 DA.
- Wastewater Report for an ATU and leach drain system – Illustrated in Master Plan.

In the interests of time, the proposed wastewater systems for accommodation are gravity draining into an ATU, then pumped up to an existing wastewater tank and leach drain system, previously approved by the Shire. Also, the wedding toilets have their own effluent tank and leach drain system, with overflow not deemed necessary by the plumbing consultant.

4.8 Transport Considerations

Traffic Report

A Transport Impact Statement (**TIS**) was commissioned in accordance with the State TIA Guidelines, which found in summary (**Appendix B**):

- The TIS has not identified any warrant for physical remedial measures as a result of the proposal. It recommends an Operational Traffic & Parking Management Plan is developed and used to addresses issues (condition of approval).
- It is recommended that the Shire and MRWA assess the safe operating speed of Point Henry Rd on the bend north of Horse Hill Rd intersection and consider a reduced speed limit or curve warning / advisory speed signage, regardless of the proposal as this is an existing issue.
- Subject to the above, the traffic and parking component of amenity impact is capable of being managed.
- The TIS addresses most of these matters and provides a reasonable basis to conclude that the proposal would have a moderate, event-based traffic impact that can be accommodated by the surrounding rural road network, subject to appropriate management. The proposal provides onsite parking, service bays, bus parking, internal manoeuvring and a defined access network.

Parking

Under the Scheme, parking requirements are considered to be met as shown below.

Parking Requirements (S. 5.9 & R-Codes)					
Issue		**Required**		**Proposed**	**Complies?**
Vehicle Bays	dwelling	2 ea	2	2	
	workers acc.	nil	0	2	
	anc. accom.	1	1	1	
	eco-tents	1 per unit	10	18	
	ACROD	1 per DA unit	1	1	
	wedding	nil	0	30	
	ACROD	1	1	4	
	delivery/load	nil	0	4	
	bus	nil	0	1	
	total	-	*14 bays*	*63 bays*	Yes
Standard Bays (Scheme)		2500W x 5500L		2600W x 5500L (XL)	Yes
Disabled Access Bays (AS1428.1 & AS2890.6)		2400W x 5400L x2		2400W x 5400L x2	Yes
Bus Bays (AS2890.4)		Std 3500W x 12500L x1		3500W x 12500L x1	Yes
Landscaping		s>20m, then 1 tree per 10 spaces		30 bays with 7 trees Extras in other areas Total 22 trees	Yes
Other Considerations		Below NGL		At NGL	NGL
		Access and manoeuvring		6m	Yes
		Location and local amenity		Isolated locality, large lots	Yes
		Setback areas			Yes
		Urban construction factors		Rural	N.A.
		Structural decks		None proposed	N.A.
		Disabled bays		Proposed	Yes
		Truck and service vehicles		Additional bays	Yes

Driveways are not proposed to be sealed, in keeping with the rural character of the locality, noting neighbours complaining about potential dust also do not have sealed driveways. The dimensions of car-parking bays will be greater than the Scheme requirement, which is more onerous than Australian Standards (AS2890.1), in order to provide a more convenient and luxurious experience.

4.9 Scheme & Policy Considerations

Local Scheme Requirements

Zone-specific and general development standards found in the Scheme (where relevant) are considered to be met as shown below.

Site & General Requirements (S. 5.25)				
Issue		**Required**	**Proposed**	**Complies?**
Building Setbacks	front (W)	Min. 20m	massive	Yes
	rear (E)		20m	Yes
	side (N)	Min. 10m	17m	Yes
	side (S)		20m	Yes
Incompatible Uses		Possible buffer	Noise addressed elsewhere	Yes
Environmental		Wetland or remnant vegetation	No wetland, vegetation addressed elsewhere	Yes
Water Supply		Sustainable	Roof capture and water carting	Yes
Soils		Suitable	See Soil and Wastewater Reports (**Appendix A**)	Yes
Wastewater		Treatment, disposal		Yes

Tourist Accommodation Requirements

The Tourist Accommodation Policy is considered to be met as shown below.

Tourist Accommodation Policy – Requirements			
Issue	**Required**	**Proposed**	**Complies?**
Location	Proximity to beach and scenic rural properties	Close to beach and scenic rural properties	Yes
Isolation	Onsite facilities	Management, food and drinks (food and drink trucks) toilets, bushfire shelter, pergolas	Yes
Parking	1 bay per guest room Accessible Landscaping to front boundary	1.5 bays Short walk Not visible from boundary	Yes
Amenity	Surrounding zones and uses Nuisance, siting, location, distances, sightlines Patrons and noise Existing accommodation and traffic	Rural-Residential to north and west, but few dwellings and considerable distances Eco-tents not in vicinity to neighbouring dwellings Nil in vicinity	Yes Yes Yes
Traffic	Nuisance and safety	TIS commissioned	Yes
Vegetation & Landscaping	Complement natural landscape	Locality has no vegetation of significant height	N.A.
Signs	Comply with Signs Policy	See assessment elsewhere	N.A.
Water	Adequate supply	Separate water tanks and fire tanks	Yes
Wastewater	Refer to DoH	Septic systems proposed	Yes

Outbuildings Requirements

The Outbuildings Policy is considered to be met as shown below.

Outbuilding Policy – Requirements			
Issue	**Required**	**Proposed**	**Complies?**
Setbacks	Front & Rear - 20m	Massive	Yes
	Side - 10m		

Signage Requirements

The proposal includes non-illuminated advertisements being 2 entry statements (**Appendix D3**) being compatible with the rural nature of the Site and locality. The purpose of the signs are to simply identify the business, alerting drivers and directing onsite in a safe and efficient manner. The signs are not within proximity to traffic signals (lights), and not on or abutting Regional Road reserves.

Under the Deemed Provisions and Scheme, the signs are not listed as an exempt advertisement (Sch. 5), and signage requirements are considered to be met as shown below.

Signs Policy – Signage Requirements			
Issue	**Required**	**Proposed**	**Complies?**
Definition	Ground-Based Sign max. 1200H	1200H	Yes
Public Health & Safety	Sharps	Not in public realm	N.A.
Location	Wholly on the property	Wholly onsite	Yes
Content	No third-party advertising, relates to site	Advertising onsite business only, relates to site	Yes
Sightlines	No obstructions	No intersection	N.A.
Illumination	Various	Not illuminated	N.A.
Meets Objectives	Various	Standard	Yes
Size	Max. 1200H	1200H	Yes
	Max. 1.5m^2	1.2m^2	Yes
Number	Max. 1 per frontage	1 per frontage	Yes

4.10 Colours & Amenity

Under the Reflective Materials Policy, the requirements are considered to be met as shown below.

Reflective Materials Policy – Material Requirements			
Issue	**Required**	**Proposed**	**Complies?**
Overlooked	From nearby properties	Proposal behind a small ridgeline and not visible from roads or public places; with plastic roof, canvas walls, and earthy tones	Yes
Visually Prominent	From main road or public place		Yes
Nuisance or Glare	From surrounding residents		Yes
Character	Not detrimental		Yes
Objectives	As above		Yes

The locality has a mixed character which includes rural-residential and rural uses, as well as a number of sensitive houses in the locality. As the proposal is for a small number of structures and activities, the proposal will not have foreseeable noise impacts requiring further analysis.

Proposed structures will be set back from the main road (Pt Henry Rd). Neighbouring properties are large in area with a low residential density and considerable distances to the proposal, with vegetation and contoured ground screening the proposal.

The road system is capable of higher trip movements and vehicular activity onsite is suitably facilitated; and noise has also been considered unlikely to be an issue.

As a consequence, it is considered that the resultant general amenity of the Site and locality will be satisfactory.

PART 5 – CONCLUSION

This report analyses a property in Bremer Bay in the Great Southern Region for the purpose of supporting a DA for a wedding venue and short-stay accommodation, with the assistance of soil & wastewater, transport, and bushfire reports.

The 100 acre Site is located in rural Point Henry with stunning views of the ocean, close to the Bremer Bay town centre, and various picturesque tourism / recreational sites accessible with good access available via local roads.

The locality has many semi-rural properties of various sizes with dwellings and outbuildings; with the Site featuring a homestead and shed on a large 100 acres of sloping land and minimal vegetation.

The proposal is for a wedding venue of up-to 120 people, including accommodation in glamping eco-tents, extensive car-parking and a bus bay, exempt structures of a minor nature formally being claimed, and minor signage.

The proposal complies with all bushfire requirements as demonstrated by a specialist report; whilst public and private utilities and services are suitably proposed to sustain proposed activities and habitation.

All land-uses are capable of approval, whilst the objectives of the zone, site requirements, and policy provisions have been met.

Amenity is considered via suitable theming, materials, colours and landscaping in keeping with the natural surroundings, with noise being not applicable with this proposal.

Accordingly, it is considered that the proposed development is an acceptable outcome to the Site and the surrounding locality, and as such, the Shire's discretion is requested to approve discretionary uses.

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APPENDICES

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Appendix A

Soil & Wastewater Reports

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Report No
7363/1

Great Southern GEOTECHNICS

Site Classification Report

Schlager Architects
The Bib Approach - 43 Horse Hill Rd, Bremer Bay

Thursday, 16 March 2023

Presented By: M.Coffey
Great Southern Geotechnics Pty Ltd
5a 209 Chester Pass Rd, Albany WA

1.0 INTRODUCTION

As authorised by ***Schlager Architects***
a site classification for the proposed building envelope at ***The Bib Approach - 43 Horse Hill Rd, Bremer Bay***
was performed on the ***22/02/2023***

2.0 GENERAL

This site investigation was carried out to determine the:
- Surface site conditions
- Subsurface soil profile
- Subsurface soil characteristics/parameters

This information is gathered to establish the swell/shrink characteristics of the underlying soils due to soil moisture changes under normal climatic conditions, and the probable amount of surface movement that may occur.

To allow for the determination of the site classification, the scope included:
- Observations of site conditions that may impact on the site classification,
- Sufficient test pits drilled and sampled to an appropriate depth, and
- Laboratory testing of samples.

3.0 SITE INVESTIGATION

Site conditions and test pit locations were recorded and are shown in Appendix 1 .
The field investigation consisted of **8** boreholes excavated on-site to depths of up to **1.6** m using a Kubota KX41-3V mini excavator with a 300mm Auger.
These test holes were located across the proposed building envelope.

All soil layers encountered were visually assessed and classified on-site.

IMPORTANT NOTE: We have endeavoured to locate the test holes so that they are representative of the subsurface materials across the intended building site. However, soil conditions may change dramatically over short distances and our investigations may not locate all soil variations across the site.

4.0 LABORATORY TESTING

Results of any relevant laboratory testing performed are shown in **Appendix 2**. (Test Results)

5.0 SITE CLASSIFICATION

In accordance with Australian Standard 2870 (2011) Residential slabs and footings, the areas shown on the accompanying site plan of 43 Horse Hill Rd, Bremer Bay are classified as class P

The sites have been classified class P due to both organic content and lack of compaction in the Insitu materials.

The "**Ancillary**" site has been classified P due to lack of compaction of the Insitu soil to a depth of 900mm below existing ground level. Should this be rectified to achieve adequate compaction the site could potentially be reclassified to a class **A**

The site labelled "**2 Bedroom**" has also been classified class P, not due to adequate compaction but due to the amount of organic content still present onsite. Should this be removed and replaced with controlled clean compacted non cohesive fill in accordance with AS 3798 the site could be reclassified to a class **S**.

A Class: The Characteristic Surface Movement (Ys) that the site may experience due to variations in subsurface moisture conditions during normal climatic changes was calculated to be 0mm - (refer to AS2870 – Section 2).
This Ys value indicates that the underlying soil profile has little to no potential to swell/shrink under normal climatic changes. This swelling &/or shrinking of the soils, particularly clay soils, is attributed to the absorption &/or loss of moisture.

S Class: The Characteristic Surface Movement (Ys) that the site may experience due to variations in subsurface moisture conditions during normal climatic changes was calculated to be 0mm to 20mm - (refer to AS2870 – Section 2).
This Ys value indicates that the underlying soil profile has potential to experience slight swell/shrink movement under normal climatic changes. This swelling &/or shrinking of the soils, particularly clay soils, is attributed to the absorption &/or loss of moisture.

The site classification was determined by visual assessment of relevant site conditions, analysis of the soil profiles revealed by the Test Pit logs, and laboratory testing of samples taken from the boreholes.

Comments. The building envelope should be stripped of all vegetation and topsoil, with any areas of soft, loose or wet material selectively excavated to provide a firm, working base.

All test pit profiles noted are recorded from existing ground levels as on the day of investigation and any removal or addition of imported material will alter the results found. The Site classification is valid only in the state of which the investigation was conducted on the day.

This report and associated documentation was undertaken for the specific purpose described in the report and shall not be relied on for other purposes. This report was prepared solely for the use by **Schlager Architects** and any reliance assumed by other parties on this report shall be at such parties own risk.

6.0 EXPLANATION

Clay-based soils have the potential to change volume and shift when a change in moisture occurs. These types of materials are called 'reactive soils' with the amount that the soil is likely to shift defining how 'reactive' it's considered to be.

Some soils have a greater potential to change volume than others, and this amount of potential needs to be measured to ensure footings are designed in a way that helps protect structures from any soil surface movement.

Site Class	Foundation	Characteristic Surface Movement
A	Most sand and rock sites with little or no ground movement from moisture changes.	
S	Slightly reactive clay sites, which may experience only slight ground movement from moisture changes.	**0mm to 20mm**
M	Moderately reactive clay or silt sites, which may experience moderate ground movement from moisture changes.	**20mm to 40mm**
H_1	Highly reactive clay sites, which may experience high ground movement from moisture changes.	**40mm to 60mm**
H_2	Highly reactive clay sites, which may experience very high ground movement from moisture changes.	**60mm to 75mm**
E	Extremely reactive sites, which may experience extreme ground movement from moisture changes.	**> 75mm**
P	Sites which include filled sites, soft soils, such as soft clay or silt or loose sands; landslip; mine subsidence; collapsing soils; soils subject to erosion; reactive sites subject to abnormal moisture conditions or sites which cannot be classified otherwise.	

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Appendix 1

Test Pit Logs

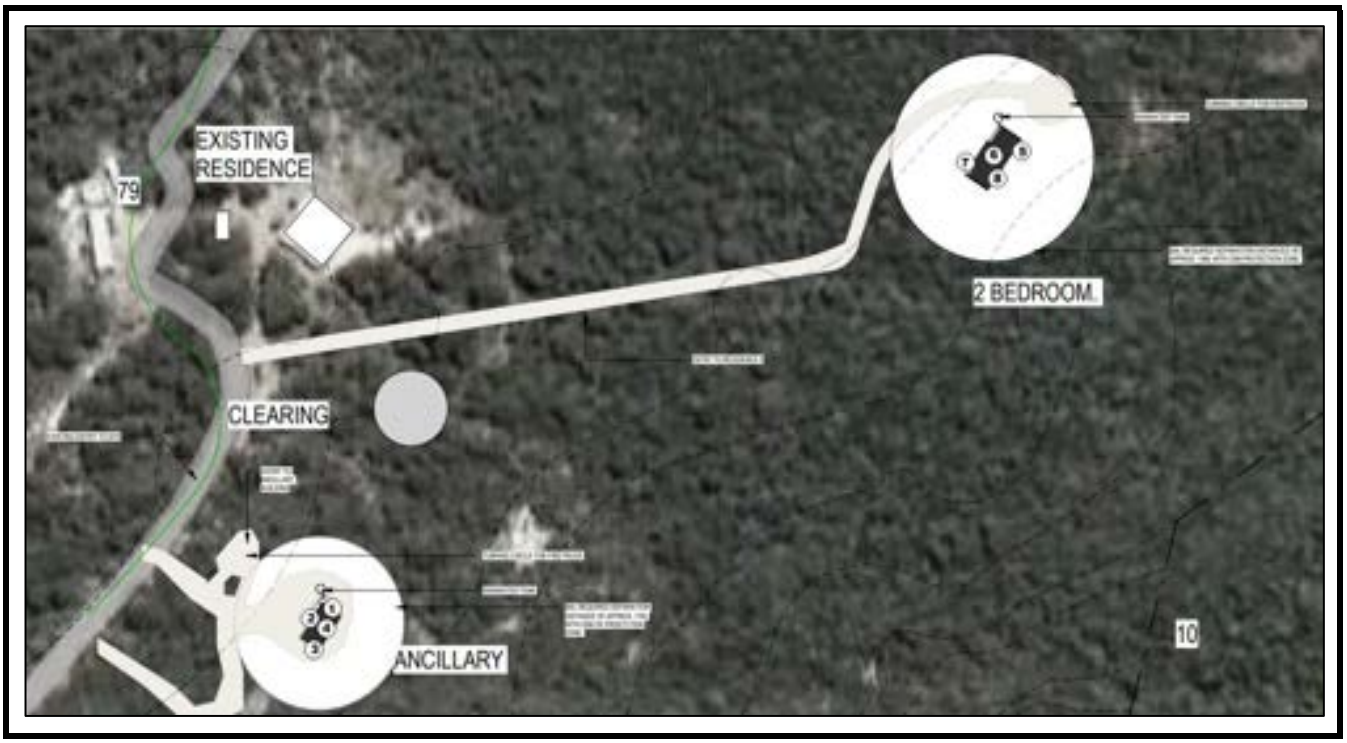
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Figure 1 - The Bib Approach - 43 Horse Hill Rd, Bremer Bay



Figure 2 - Approximate Test Pit Locations



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No	7363	Report	7363/1	Sheet	7	of	23

Client:	Schlager Architects	Operator/Contractor:	GSG
Project:	The Bib Approach - 43 Horse Hill Rd, Bremer Bay	Equipment type:	Kubota KX41-3V
Project No.	Qu-0878	Excavation Method :	300mm Auger
Location:	Proposed Building Envelope	Position:	See site plan
Test Pit No.:	**TP1** Sample No. **7363G1**	Elevation:	n/a

Date Commenced:	22/02/2023	Logged By:	M.Coffey	Excavation Dimensions: Depth 1.6 (m)	Width 0.3 (m)

Depth Below Surface (mm)	Layer Depth (mm)	Material Description SOIL TYPE, Plasticity, Colour, Particle characteristics, Secondary and other minor components	Moist. Condition	Consistency / Strength	Cementation	Water Table	Classification Symbol	Sample/Test
0 - 100	100	**SAND with silt:** Grey, fine to medium.	D	C		No water table encountered.		
		Contains roots and root fibres.						
100 - 1300	1200	**SAND:** Light brown/yellow, fine to medium.	M	L-MD				
1300 - 1600	300	**Gravelly SAND:** Brown, fine to medium.	M	MD				
		Fine to coarse sub-rounded to sub-angular gravel.						

Comments

Pit Terminated at: ✓ or ×		(mm) below ground level
Target Depth	✓	1600
Cave In		
Refusal		
Near Refusal		
Flooding		
Lack of Reach		

Materials Consistency/Strength		Rock	Cementation
Cohesive	**Non-Cohesive**		
VS - Very Soft	VL - Very Loose	EL - Extremely Low	
S - Soft	L - Loose	VL - Very Low	IN - Indurated
F - Firm	MD - Medium Dense	L - Low	PC - Poorly Cemented
St - Stiff	D - Dense	M - Medium	MC - Moderately Cemented
VSt - Very Stiff	VD - Very Dense	H - High	WC - Well Cemented
H - Hard	CO - Compact	VH - Very High	
		EH - Extremely High	

▼ Water
Water first Encountered

Moisture
D - Dry M - Moist W - Wet

General
N/A - Not Applicable
N/D - Not Determined

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Test Pit No. 1 - Excavation



Test Pit No. 1 - Spoil



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363 **Test Pit No:** **TP1**
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No	7363	Report	7363/1	Sheet	9	of	23

Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay
Project No. Qu-0878
Location: Proposed Building Envelope
Test Pit No.: **TP2** Sample No. **7363G2**

Operator/Contractor: GSG
Equipment type: Kubota KX41-3V
Excavation Method : 300mm Auger
Position: See site plan
Elevation: n/a

Date Commenced: 22/02/2023
Logged By: M.Coffey
Excavation Dimensions: Depth 1.6 (m) Width 0.3 (m)

Depth Below Surface (mm)	Layer Depth (mm)	Material Description SOIL TYPE, Plasticity, Colour, Particle characteristics, Secondary and other minor components	Moist. Condition	Consistency / Strength	Cementation	Water Table	Classification Symbol	Sample/Test
0 - 800	800	**SAND with silt**: Grey, fine to medium.	D	L		No water table encountered.		#
		Trace roots and root fibres.						
800	-	**Refusal:**						

Comments

Pit Terminated at: ✓ or × (mm) below ground level

Target Depth		
Cave In		
Refusal	✓	800
Near Refusal		
Flooding		
Lack of Reach		

Materials Consistency/Strength

Cohesive	Non-Cohesive
VS - Very Soft	VL - Very Loose
S - Soft	L - Loose
F - Firm	MD - Medium Dense
St - Stiff	D - Dense
VSt - Very Stiff	VD - Very Dense
H - Hard	CO - Compact

Rock

EL - Extremely Low
VL - Very Low
L - Low
M - Medium
H - High
VH - Very High
EH - Extremely High

Cementation

IN - Indurated
PC - Poorly Cemented
MC - Moderately Cemented
WC - Well Cemented

Water
▼ Water first Encountered

Moisture
D - Dry M - Moist W - Wet

General
N/A - Not Applicable
N/D - Not Determined

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Test Pit No. 2 - Excavation



Test Pit No. 2 - Spoil



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363 **Test Pit No:** **TP2**
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No	7363	Report	7363/1	Sheet	11	of	23

Client:	Schlager Architects	Operator/Contractor:	GSG
Project:	The Bib Approach - 43 Horse Hill Rd, Bremer Bay	Equipment type:	Kubota KX41-3V
Project No.	Qu-0878	Excavation Method :	300mm Auger
Location:	Proposed Building Envelope	Position:	See site plan
Test Pit No.:	**TP3** Sample No. **7363G3**	Elevation:	n/a

Date Commenced:	22/02/2023	Logged By:	M.Coffey	Excavation Dimensions: Depth 1.6 (m)	Width 0.3 (m)

Depth Below Surface (mm)	Layer Depth (mm)	Material Description SOIL TYPE, Plasticity, Colour, Particle characteristics, Secondary and other minor components	Moist. Condition	Consistency / Strength	Cementation	Water Table	Classification Symbol	Sample/Test
0 - 350	350	**SAND with silt:** Grey, fine to medium.	D	L		No water table encountered.		
		Trace roots and root fibres.						
350 - 1600	1250	**SAND:** Light brown/yellow, fine to medium.	D-M	L-MD				

Comments

Pit Terminated at: ✓ or ×		(mm) below ground level
Target Depth	✓	1600
Cave In		
Refusal		
Near Refusal		
Flooding		
Lack of Reach		

Materials Consistency/Strength		Rock	Cementation
Cohesive	**Non-Cohesive**		
VS - Very Soft	VL - Very Loose	EL - Extremely Low	
S - Soft	L - Loose	VL - Very Low	IN - Indurated
F - Firm	MD - Medium Dense	L - Low	PC - Poorly Cemented
St - Stiff	D - Dense	M - Medium	MC - Moderately Cemented
VSt - Very Stiff	VD - Very Dense	H - High	WC - Well Cemented
H - Hard	CO - Compact	VH - Very High	
		EH - Extremely High	

▼ Water
Water first Encountered

Moisture
D - Dry M - Moist W - Wet

General
N/A - Not Applicable
N/D - Not Determined

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Test Pit No. 3 - Excavation



Test Pit No. 3 - Spoil



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363 **Test Pit No:** **TP3**
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No 7363 | **Report** 7363/1 | **Sheet** 13 **of** 23

Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay
Project No. Qu-0878
Location: Proposed Building Envelope
Test Pit No.: **TP4** Sample No. **7363G4**

Operator/Contractor: GSG
Equipment type: Kubota KX41-3V
Excavation Method : 300mm Auger
Position: See site plan
Elevation: n/a

Date Commenced: 22/02/2023
Logged By: M.Coffey
Excavation Dimensions: Depth 1.6 (m) Width 0.3 (m)

Depth Below Surface (mm)	Layer Depth (mm)	Material Description SOIL TYPE, Plasticity, Colour, Particle characteristics, Secondary and other minor components	Moist. Condition	Consistency / Strength	Cementation	Water Table	Classification Symbol	Sample/Test
0 - 250	250	**SAND with silt:** Grey, fine to medium.	D	L		No water table encountered.		
		Trace roots and root fibres.						
250 - 1300	1050	**SAND with silt:** Light brown/yellow.	D-M	L-MD				
		Fine to medium grained sand.						
1300	-	**Refusal**						

Comments

Pit Terminated at: ✓ or × (mm) below ground level

Target Depth		
Cave In		
Refusal	✓	1300
Near Refusal		
Flooding		
Lack of Reach		

Materials Consistency/Strength

Cohesive	Non-Cohesive
VS - Very Soft	VL - Very Loose
S - Soft	L - Loose
F - Firm	MD - Medium Dense
St - Stiff	D - Dense
VSt - Very Stiff	VD - Very Dense
H - Hard	CO - Compact

Rock

EL - Extremely Low
VL - Very Low
L - Low
M - Medium
H - High
VH - Very High
EH - Extremely High

Cementation

IN - Indurated
PC - Poorly Cemented
MC - Moderately Cemented
WC - Well Cemented

Water
▼ Water first Encountered

Moisture
D - Dry M - Moist W - Wet

General
N/A - Not Applicable
N/D - Not Determined

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Test Pit No. 4 - Excavation



Test Pit No. 4 - Spoil



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363 **Test Pit No:** **TP4**
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No 7363 | **Report** 7363/1 | **Sheet** 15 **of** 23

Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay
Project No. Qu-0878
Location: Proposed Building Envelope
Test Pit No.: **TP5** Sample No. **7363G5**

Operator/Contractor: GSG
Equipment type: Kubota KX41-3V
Excavation Method : 300mm Auger
Position: See site plan
Elevation: n/a

Date Commenced: 22/02/2023 | Logged By: M.Coffey

Excavation Dimensions:
Depth 1.6 (m) Width 0.3 (m)

Depth Below Surface (mm)	Layer Depth (mm)	Material Description SOIL TYPE, Plasticity, Colour, Particle characteristics, Secondary and other minor components	Moist. Condition	Consistency / Strength	Cementation	Water Table	Classification Symbol	Sample/Test
0 - 650	650	**SAND with silt:** Grey/brown, fine to medium.	D	L		No water table encountered.		#
		Contains roots and root fibres.						
650 - 1050	400	**SAND with silt:** Grey/brown, fine to medium.	D-M	L-MD				
1050 - 1600	550	**Gravelly SAND with clay:** Brown with pockets of white, fine to medium.	M	F				
		Fine to coarse sub-rounded to sub-angular gravel. Contains cobbles.						

Comments

Pit Terminated at: ✓ or × (mm) below ground level

Target Depth	✓	1600
Cave In		
Refusal		
Near Refusal		
Flooding		
Lack of Reach		

Materials Consistency/Strength

Cohesive	Non-Cohesive
VS - Very Soft	VL - Very Loose
S - Soft	L - Loose
F - Firm	MD - Medium Dense
St - Stiff	D - Dense
VSt - Very Stiff	VD - Very Dense
H - Hard	CO - Compact

Rock

EL - Extremely Low
VL - Very Low
L - Low
M - Medium
H - High
VH - Very High
EH - Extremely High

Cementation

IN - Indurated
PC - Poorly Cemented
MC - Moderately Cemented
WC - Well Cemented

Water
▼ Water first Encountered

Moisture
D - Dry M - Moist W - Wet

General
N/A - Not Applicable
N/D - Not Determined

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Test Pit No. 5 - Excavation



Test Pit No. 5 - Spoil



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363 **Test Pit No:** **TP5**
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No	7363	Report	7363/1	Sheet	17	of	23

Client:	Schlager Architects	Operator/Contractor:	GSG
Project:	The Bib Approach - 43 Horse Hill Rd, Bremer Bay	Equipment type:	Kubota KX41-3V
Project No.	Qu-0878	Excavation Method :	300mm Auger
Location:	Proposed Building Envelope	Position:	See site plan
Test Pit No.:	**TP6** Sample No. **7363G6**	Elevation:	n/a

Date Commenced:	22/02/2023	Logged By:	M.Coffey	Excavation Dimensions: Depth 1.6 (m)	Width 0.3 (m)

Depth Below Surface (mm)	Layer Depth (mm)	Material Description SOIL TYPE, Plasticity, Colour, Particle characteristics, Secondary and other minor components	Moist. Condition	Consistency / Strength	Cementation	Water Table	Classification Symbol	Sample/Test
0 - 400	400	**SAND with silt:** Grey, fine to medium.	D	L		No water table encountered.		
		Contains roots and root fibres.						
400 -1200	800	**SAND with silt:** Grey, fine to medium.	DM	L-MD				
1200 - 1600	400	**SAND:** Light brown, fine to medium.	M	L-MD				

Comments

Pit Terminated at: ✓ or ×		(mm) below ground level
Target Depth	✓	1600
Cave In		
Refusal		
Near Refusal		
Flooding		
Lack of Reach		

Materials Consistency/Strength		Rock	Cementation
Cohesive	**Non-Cohesive**		
VS - Very Soft	VL - Very Loose	EL - Extremely Low	
S - Soft	L - Loose	VL - Very Low	IN - Indurated
F - Firm	MD - Medium Dense	L - Low	PC - Poorly Cemented
St - Stiff	D - Dense	M - Medium	MC - Moderately Cemented
VSt - Very Stiff	VD - Very Dense	H - High	WC - Well Cemented
H - Hard	CO - Compact	VH - Very High	
		EH - Extremely High	

▼ Water
Water first Encountered

Moisture
D - Dry M - Moist W - Wet

General
N/A - Not Applicable
N/D - Not Determined

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Test Pit No. 6 - Excavation



Test Pit No. 6 - Spoil



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363 **Test Pit No:** **TP6**
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No 7363 | **Report** 7363/1 | **Sheet** 19 **of** 23

Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay
Project No. Qu-0878
Location: Proposed Building Envelope
Test Pit No.: **TP7** Sample No. **7363G7**

Operator/Contractor: GSG
Equipment type: Kubota KX41-3V
Excavation Method : 300mm Auger
Position: See site plan
Elevation: n/a

Date Commenced: 22/02/2023
Logged By: M.Coffey
Excavation Dimensions: Depth 1.6 (m) Width 0.3 (m)

Depth Below Surface (mm)	Layer Depth (mm)	Material Description SOIL TYPE, Plasticity, Colour, Particle characteristics, Secondary and other minor components	Moist. Condition	Consistency / Strength	Cementation	Water Table	Classification Symbol	Sample/Test
0 - 400	400	**SAND with silt:** Grey, fine to medium.	D	L		No water table encountered.		
		Contains roots and root fibres.						
400 - 1300	900	**SAND with silt:** Grey, fine to medium.	DM	L-MD				
1300 - 1600	300	**SAND:** Light brown, fine to medium.	M	L-MD				

Comments

Pit Terminated at: ✓ or × (mm) below ground level

Target Depth	✓	1600
Cave In		
Refusal		
Near Refusal		
Flooding		
Lack of Reach		

Materials Consistency/Strength

Cohesive	Non-Cohesive
VS - Very Soft	VL - Very Loose
S - Soft	L - Loose
F - Firm	MD - Medium Dense
St - Stiff	D - Dense
VSt - Very Stiff	VD - Very Dense
H - Hard	CO - Compact

Rock
EL - Extremely Low
VL - Very Low
L - Low
M - Medium
H - High
VH - Very High
EH - Extremely High

Cementation
IN - Indurated
PC - Poorly Cemented
MC - Moderately Cemented
WC - Well Cemented

Water
▼ Water first Encountered

Moisture
D - Dry M - Moist W - Wet

General
N/A - Not Applicable
N/D - Not Determined

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Test Pit No. 7 - Excavation



Test Pit No. 7 - Spoil



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363 **Test Pit No:** **TP7**
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No 7363 | **Report** 7363/1 | **Sheet** 21 **of** 23

Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay
Project No. Qu-0878
Location: Proposed Building Envelope
Test Pit No.: **TP8** Sample No. **7363G8**

Operator/Contractor: GSG
Equipment type: Kubota KX41-3V
Excavation Method : 300mm Auger
Position: See site plan
Elevation: n/a

Date Commenced: 22/02/2023
Logged By: M.Coffey
Excavation Dimensions: Depth 1.6 (m) Width 0.3 (m)

Depth Below Surface (mm)	Layer Depth (mm)	Material Description SOIL TYPE, Plasticity, Colour, Particle characteristics, Secondary and other minor components	Moist. Condition	Consistency / Strength	Cementation	Water Table	Classification Symbol	Sample/Test
0 - 400	400	**SAND with silt:** Grey, fine ro medium.	D	L		No water table encountered.		
		Contains roots and root fibres.						
400 - 700	300	**SAND with silt**: Grey, fine to medium.	D	L				
700 - 1600	900	**SAND:** Light brown, fine to medium.	D	L-MD				

Comments

Pit Terminated at: ✓ or × (mm) below ground level

Target Depth	✓	1600
Cave In		
Refusal		
Near Refusal		
Flooding		
Lack of Reach		

Materials Consistency/Strength

Cohesive	Non-Cohesive
VS - Very Soft	VL - Very Loose
S - Soft	L - Loose
F - Firm	MD - Medium Dense
St - Stiff	D - Dense
VSt - Very Stiff	VD - Very Dense
H - Hard	CO - Compact

Rock

EL - Extremely Low
VL - Very Low
L - Low
M - Medium
H - High
VH - Very High
EH - Extremely High

Cementation

IN - Indurated
PC - Poorly Cemented
MC - Moderately Cemented
WC - Well Cemented

Water
▼ Water first Encountered

Moisture
D - Dry M - Moist W - Wet

General
N/A - Not Applicable
N/D - Not Determined

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Test Pit No. 8 - Excavation



Test Pit No. 8 - Spoil



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

Job No: 7363 **Test Pit No:** **TP8**
Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay

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Appendix 2

Test Results

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CONSTRUCTION MATERIALS TESTING

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Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay
Section: Proposed Building Envelope

Client Number: Qu-0878
Date Sampled: 22/02/2023
Date Received: -

Determination of the Penetration Resistance of Soil Test Report

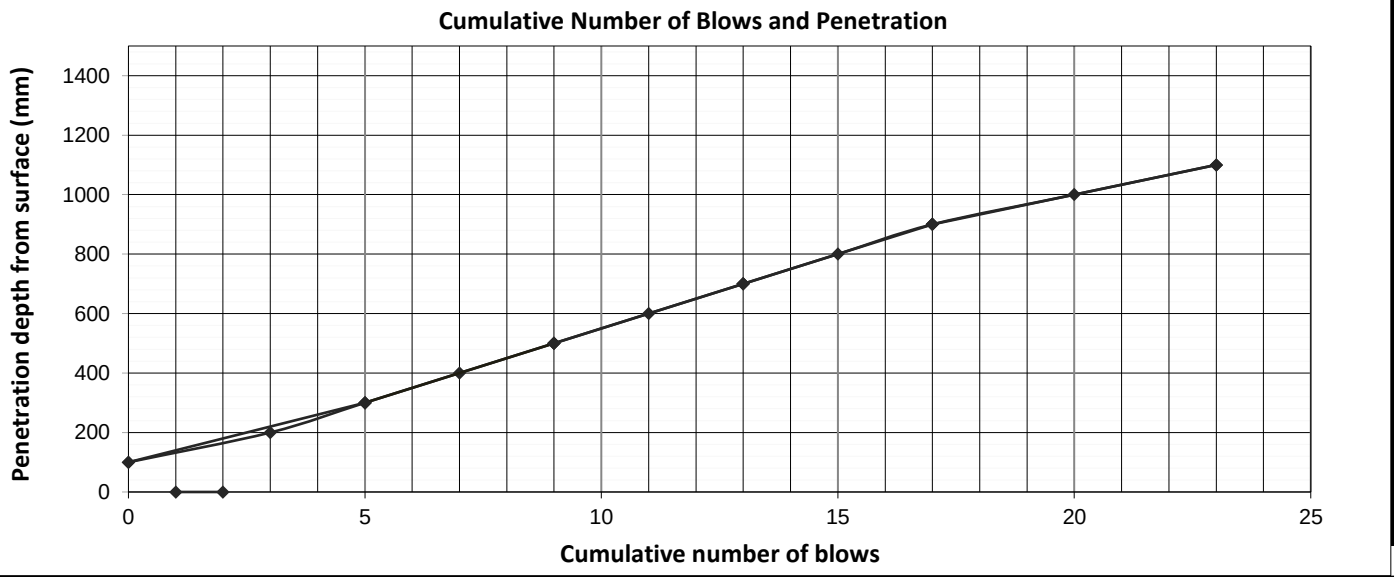
Test Method - AS 1289.6.3.2

Sample No.	7363G9	Material Description	In Situ

Location	Test Pit 1	Preparation Method	AS1289.1.1
Layer Type	In Situ	Sampling Method	AS 1289.1.2.1 Proc 6.5

Depth below surface at the commencement of penetration (mm)	Reduced level of ground surface at test site (R.L)	Location of ground water table, if intersected or known (mm)	Depth from surface for moisture condition of soil determination (mm)	Moisture Content (%)
			- to -	Refer to Test Pit Logs
			- to -	
100	0	Unknown	- to -	
			- to -	
			- to -	

Penetration depth from surface (mm) Start	Finish	Penetration (mm)	Average number of blows per 100mm over this depth	Calculated CBR (%)
100	300	200	3	4
300	500	200	2	3
500	700	200	2	3
700	900	200	2	3
900	1100	200	3	5



Comments: Calculated CBR is not NATA accredited.

Distribution: Laboratory File / Grace Schlager
Document ID: WS_AS_DCP_Rev4_Sep2022
Accredited for compliance with ISO/IEC 17025 - Testing - Accreditation No. 20092

Name: M.Coffey
Function: Quality Manager
Date: 13/03/2023

Approved Signatory:

GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

5a 209 Chester Pass Rd, Milpara WA 6330
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Email: Info@gsgeotechnics.com
WWW.GSGEOTECHNICS.COM

Client: Schlager Architects
Project: The Bib Approach - 43 Horse Hill Rd, Bremer Bay
Section: Proposed Building Envelope

Client Number: Qu-0878
Date Sampled: 22/02/2023
Date Received: -

Determination of the Penetration Resistance of Soil Test Report

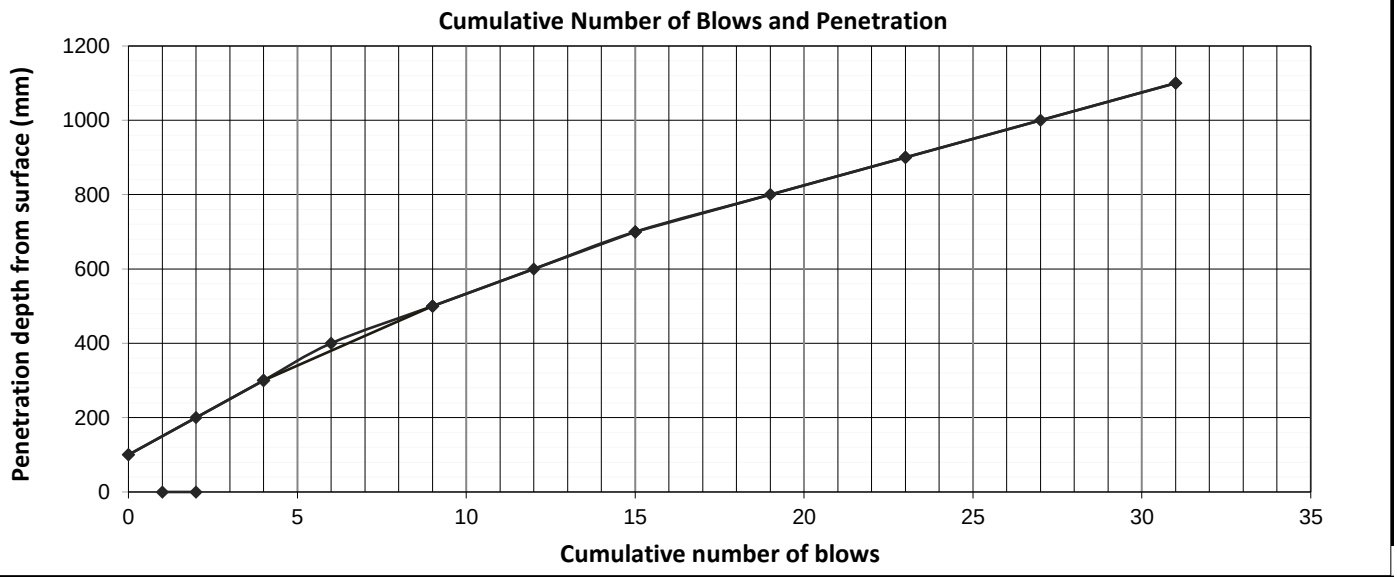
Test Method - AS 1289.6.3.2

Sample No.	7363G10	Material Description	In Situ

Location	Test pit 6	Preparation Method	AS1289.1.1
Layer Type	In Situ	Sampling Method	AS 1289.1.2.1 Proc 6.5

Depth below surface at the commencement of penetration (mm)	Reduced level of ground surface at test site (R.L)	Location of ground water table, if intersected or known (mm)	Depth from surface for moisture condition of soil determination (mm)	Moisture Content (%)
			- to -	Refer to Test Pit Logs
			- to -	
100	0	Unknown	- to -	
			- to -	
			- to -	

Penetration depth from surface (mm) Start	Finish	Penetration (mm)	Average number of blows per 100mm over this depth	Calculated CBR (%)
100	300	200	2	3
300	500	200	3	4
500	700	200	3	5
700	900	200	4	8
900	1100	200	4	8



Comments: Calculated CBR is not NATA accredited.

Name: M.Coffey
Function: Quality Manager
Date: 13/03/2023

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COLOURS

BLACK - BROWN (bk)	BLUE (bl)	ORANGE (or)
BROWN (br)	BLUE - GREEN (bl/gr)	RED (rd)
GREY - BROWN (gy/br)	GREEN (gr)	RED - BROWN (rd/br)
GREY (gy)	YELLOW (yl)	PINK (pk)
BLUE - GREY (bl/gy)	YELLOW - BROWN (yl/br)	PURPLE (pr)

MOISTURE CONDITION OF SOIL

TERM	DESCRIPTION
Dry	Cohesive soils; hard and friable or powdery, well dry of plastic limit. Granular soils; cohesionless and free-running.
Moist	Soil feels cool, darkened in colour. Cohesive soils can be moulded. Granular soils tend to cohere.
Wet	Soil feels cool, darkened in colour. Cohesive soils usually weakened and free water forms on hands when handling. Granular soils tend to cohere and free water forms on hands when handling.

PARTICLE SHAPES

ANGULAR	SUB-ANGULAR	SUB-ROUNDED	ROUNDED






PARTICLE SIZES

BOULDERS	COBBLES	COARSE GRAVEL	MEDIUM GRAVEL	FINE GRAVEL	COARSE SAND	MEDIUM SAND	FINE SAND	SILT	CLAY
>200mm	63-200mm	20-63mm	6-20mm	2.36-6mm	0.6-2.36mm	0.2-0.6mm	0.075-0.2mm	0.002-0.075mm	<0.002mm

GRAIN SIZE

SOIL TYPE (ABBREV.)	CLAY (CL)	SILT (SI)	←	SAND (SA)	→	←	GRAVEL (GR)	→	COBBLES (CO)
SIZE	< 2µm	2-75µm	Fine 0.075-0.2mm	Medium 0.2-0.6mm	Coarse 0.6-2.36mm	Fine 2.36-6mm	Medium 6-20mm	Coarse 20-63mm	63-200mm
SHAPE & TEXTURE	Shiny	Dull	← angular or sub angular or sub rounded or rounded →						
FIELD GUIDE	Not visible under 10x	Visible under 10x	Visible by eye	Visible at < 1m	Visible at < 3m	Visible at < 5m	Road gravel	Rail ballast	Beaching

GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

CLASSIFICATION CHART

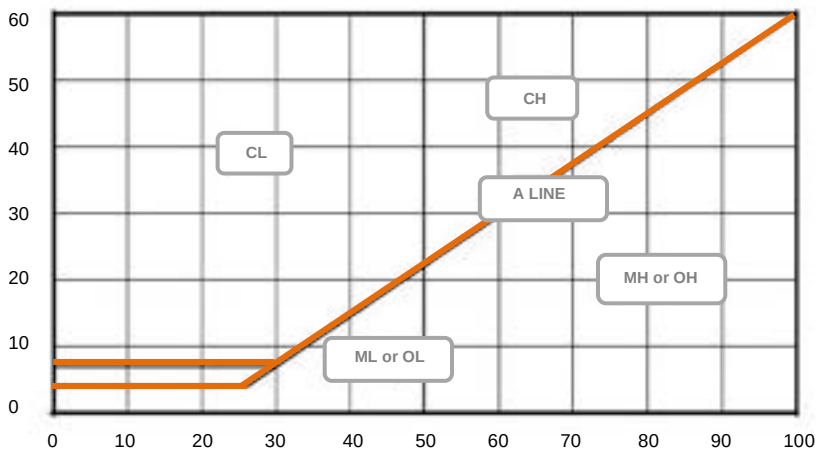
FIELD IDENTIFICATION PROCEDURES (Excluding particles larger than 60mm and basing fractions on estimated mass)				GROUP SYMBOLS	TYPICAL NAMES
COARSE GRAINED SOILS More than 50% of material less than 63 mm is larger than 0.075 mm	GRAVELS More than 50% of coarse fraction is larger than 2.36mm	CLEAN GRAVELS (Little or no fines)	Wide range in grain size and substantial amounts of all intermediate sizes, not enough fines to bind coarse grains, no dry strength	GW	Well graded gravels, gravel-sand mixtures, little or no fines
			Predominantly one size or range of sizes with some intermediate sizes missing, not enough fines to bind coarse grains, no dry strength	GP	Poorly Graded gravels and gravel-sand mixtures, little or no fines, uniform gravels
		GRAVELS WITH FINES (Appreciable amount of fines)	Dirty' materials with excess of non-plastic fines, zero to medium dry strength	GM	Silty gravels, gravel-sand-silt mixtures
			'Dirty' materials with excess of plastic fines, medium to high dry strength	GC	Clayey gravels, gravel-sand-clay mixtures
	SANDS More than 50% of coarse fraction is smaller than 2.36mm	CLEAN SANDS (Little or no fines)	Wide range in grain size and substantial amounts of all intermediate sizes, not enough fines to bind coarse grains, no dry strength	SW	Well graded sands, gravelly sands, little or no fines
			Predominantly one size or range of sizes with some intermediate sizes missing, not enough fines to bind coarse grains, no dry strength '	SP	Poorly graded sands and gravelly sands; little or no fines, uniform sands
		SANDS WITH FINES (Appreciable amount of fines)	Dirty' materials with excess of non-plastic fines, zero to medium dry strength	SM	Silty sands, sand-silt mixtures
			'Dirty' materials with excess of plastic fines, medium to high dry strength	SC	Clayey sands, sand-clay mixtures

FINE GRAINED SOILS More than 50% of material less than 63 mm is smaller than 0.075 mm	IDENTIFICATION PROCEDURES ON FRACTIONS <0.2mm					
		DRY STRENGTH	DILATANCY	TOUGHNESS		
	SILTS AND CLAYS Liquid limit less than 50	None to low	Quick to slow	None	ML	Inorganic silts and very fine sands, rock flour, silty or clayey fine sands with low plasticity. Silts of low to medium Liquid Limit.
		Medium to high	None to very slow	Medium	CL, CI	Inorganic clays of low to medium plasticity, gravelly clays, sandy clays, silty clays.
		Low to medium	Slow	Low	OL	Organic silts and organic silt-clays of low to medium plasticity.
	SILTS AND CLAYS Liquid limit greater than 50	Low to medium	Slow to none	Low to medium	MH	Inorganic silts, micaceous or diatomaceous fine sandy or silty soils, silts of high Liquid Limit.
		High to very high	None	High	CH	Inorganic clays of high plasticity.
		Medium to high	None to very slow	Low to medium	OH	Organic clays of high plasticity

HIGHLY ORGANIC SOILS	Readily identified by colour, odour, spongy feel and frequently by fibrous texture	Pt	Peat and other highly organic soils

PLASTICITY CHART

For laboratory classification of fine grained soils



GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

PLASTICITY

DESCRIPTIVE TERM	OF LOW PLASTICITY	OF MEDIUM PLASTICITY	OF HIGH PLASTICITY
Range Of Liquid Limit (%)	≤ 35	> 35 ≤ 50	> 50

DESCRIPTION OF ORGANIC OR ARTIFICIAL MATERIALS

PREFERRED TERMS	SECONDARY DESCRIPTION
Organic Matter	Fibrous Peat/ Charcoal/ Wood Fragments/ Roots (greater than approximately 2mm diameter)/ Root Fibres (less than approximately 2mm diameter)
Waste Fill	Domestic Refuse/ Oil/ Bitumen/ Brickbats/ Concrete Rubble/ Fibrous Plaster/ Wood Pieces/ Wood Shavings/ Sawdust/ Iron Filings/ Drums/ Steel Bars/ Steel Scrap/ Bottles/ Broken Glass/ Leather

CONSISTENCY - Cohesive soils

TERM	VERY SOFT	SOFT	FIRM	STIFF	VERY STIFF	HARD
Symbol	VS	S	F	St	VSt	H
Undrained Shear Strength (kPa)	< 12	12 - 25	25 - 50	50 - 100	100 - 200	> 200
SPT (N) Blowcount	0 - 2	2 - 4	4 - 8	8 - 15	15 - 30	> 30
Field Guide	Exudes between the fingers when squeezed	Can be moulded by light finger pressure	Can be moulded by strong finger pressure	Cannot be moulded by fingers. Can be indented by thumb nail	Can be indented by thumb nail	Can be indented with difficulty with thumb nail

CONSISTENCY - Non-cohesive soils

TERM	VERY LOOSE	LOOSE	MEDIUM DENSE	DENSE	VERY DENSE	COMPACT
Symbol	VL	L	MD	D	VD	CO
SPT (N) Blowcount	0 - 4	4 - 10	10 - 30	30 - 50	50 - 100	> 50/150 mm
Density Index (%)	< 15	15 - 35	35 - 65	65 - 85	85 - 95	> 95
Field Guide	Ravels	Shovels easily	Shovelling very difficult	Pick required	Pick difficult	Cannot be picked

MINOR COMPONENTS

TERM	TRACE	WITH
% Minor Component	Coarse grained soils: < 5% Fine grained soils: <15%	Coarse grained soils: 5 – 12% Fine grained soils: 15 – 30%
Field Guide	Presence just detectable by feel or eye, but soil properties little or no different to general properties of primary components	Presence easily detectable by feel or eye, soil properties little different to general properties of primary component

GREAT SOUTHERN GEOTECHNICS
CONSTRUCTION MATERIALS TESTING

GEOLOGICAL ORIGIN

	TYPE	DETAILS
TRANSPORTED SOILS	Aeolian Soils	Deposited by wind
	Alluvial Soils	Deposited by streams and rivers
	Colluvial Soils	Deposited on slopes
	Lacustrine Soils	Deposited by lakes
	Marine Soils	Deposited in ocean, bays, beaches and estuaries
FILL MATERIALS	Soil Fill	Describe soil type, UCS symbol and add 'FILL'
	Rock Fill	Rock type, degree of weathering, and word 'FILL'.
	Domestic Fill	Percent soil or rock, whether pretrucible or not.
	Industrial Fill	Percent soil, whether contaminated, particle size & type of waste product, ie brick, concrete, metal

STRENGTH OF ROCK MATERIAL

TERM	SYMBOL	IS(50)	(MPA)	FIELD GUIDE TO STRENGTH
Extremely Low	EL	≤0.03		Easily remoulded by hand to a material with soil properties.
Very Low	VL	>0.03	≤0.1	Material crumbles under firm blows with sharp end of pick; can be peeled with knife; too hard to cut a triaxle sample by hand. Pieces up to 3 cm thick can be broken by finger pressure.
Low	L	>0.1	≤0.3	Easily scored with a knife; indentations 1 mm to 3 mm show in the specimen with firm blows of the pick point; has dull sound under hammer. A piece of core 150 mm long by 50 mm diameter may be broken by hand. Sharp edges of core may be friable and break during handling.
Medium	M	>0.3	≤1.0	Readily scored with a knife; a piece of core 150 mm long by 50 mm diameter can be broken by hand with difficulty.
High	H	>1	≤3	A piece of core 150 mm long by 50 mm diameter cannot be broken by hand but can be broken by a pick with a single firm blow; rock rings under hammer.
Very High	VH	>3	≤10	Hand specimen breaks with pick after more than one blow; rock rings under hammer.
Extremely High	EH	>10		Specimen requires many blows with geological pick to break through intact material; rock rings under hammer.

ROCK MATERIAL WEATHERING CLASSIFICATION

TERM	SYMBOL	DEFINITION
Residual Soil	RS	Soil developed on extremely weathered rock; the mass structure and substance fabric are no longer evident; there is a large change in volume but the soil has not been significantly transported
Extremely Weathered Rock	XW	Rock is weathered to such an extent that it has 'soil' properties, i.e. it either disintegrates or can be remoulded, in water.
Distinctly Weathered Rock	DW	Rock strength usually changed by weathering. Rock may be highly discoloured, usually be iron staining. Porosity may be increased by leaching or may be decreased due to deposition of weathering products in pores.
Slightly Weathered Rock	SW	Rock is slightly discoloured but shows little or no change of strength from fresh rock.
Fresh Rock	FR	Rock shows no sign of decomposition or staining.

Taylex
WASTEWATER

DEPARTMENT OF HEALTH
APPROVED
18 Apr 2023
CHO
OF WA

Specification

POLY ADVANCED BLOWER SYSTEM
-Nutrient Reduction
-2000L/per day

PABSNR-2000

Taylex WASTEWATER

DEPARTMENT OF HEALTH
APPROVED
18 Apr 2023
CHO
OF WA

TAYLEX POLY ADVANCED BLOWER SYSTEM NUTRIENT REDUCTION 2000L/ per day PABSNR -2000

Specification

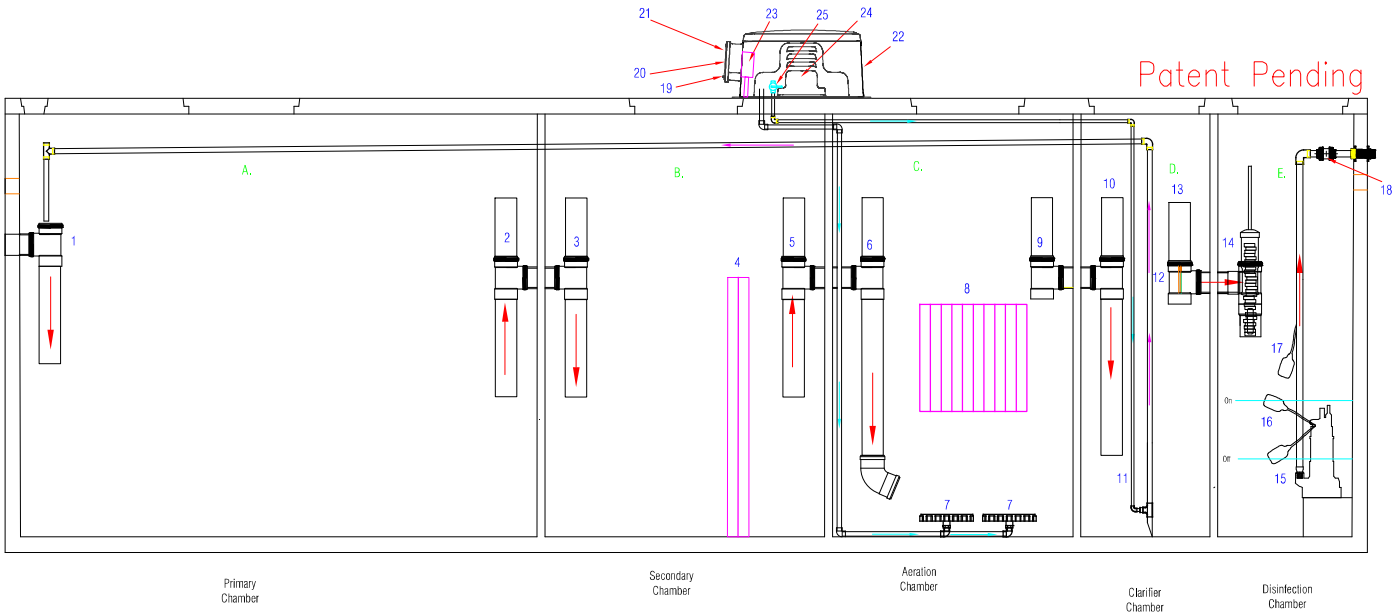
General Description:

The Taylex Poly Advanced Blower System NR 2000 (PABSNR-2000) Secondary Treatment System (STS) is designed to treat the wastewater from a residential dwelling up to 2,000 Litres per day, with a daily flow of 150 Litres per person and an average daily BOD^5 70g per person.

The Taylex PABSNR-2000 STS is contained in one vertical axis type cylindrical moulded polyethylene collection well with a design capacity of 7,449 Litres and an operating capacity of 5,908 Litres.

Flow path of wastewater:

1. A primary pre-treatment chamber, with a capacity of 1,646 Litres.
2. A secondary pre-treatment chamber, with a capacity of 881 Litres.
3. An aeration chamber, with a capacity of 2,053 Litres. This chamber is fitted with bio block media, 2, 9" disk diffusers.
4. A sedimentation / clarifier chamber, with a capacity of 663 Litres, containing a Taylex Filter Control (TFC) fitted to the outlet, and recirculation to the primary.
5. A Disinfection chamber, with a capacity of 665 Litres, incorporating a capacity of 300 Litres for chlorine contact of effluent. A chlorine disinfection unit is installed on the inlet to the irrigation chamber. The system is fitted with either a Davey D25 or D42 Irrigation Pump.
6. An Emergency Storage Buffer 1541 Litres.
7. The automatic irrigation pump transfers the treated effluent to the effluent disposal area / land application area (LAA).



Taylex WASTEWATER

DEPARTMENT OF HEALTH
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Product Specification Table:

Australian Standards Compliance		
Effluent Testing	AS1546.3:2017	
Tank Design and Testing	In Ground	AS1546.1:2008
	Above Ground	AS4766.2006
System Model	PABSNR-2000	POLY
Treatment Level	Advanced Secondary + % Nutrient Reduction	

Tank Capacity	
Total Tank Capacity	7449L
Operating Capacity	5908L

System Chamber Capacities	
Primary Chamber	1646L
Secondary Chamber	881L
Aeration Chamber	2053L
Clarifier Chamber	663L
irrigation Chamber	665L
Emergency Storage	1541L
Maximum Hydraulic Loading Capacity	2,000 litres per day / 13EP

Design Parameters		
Parameter	Total Per Day	Total Per person Per day
Daily Flow	2,000L/ 13 EP	150L
Maximum Organic Loading BOD^5	910g	70g
Total Suspended Solids (TSS)	910g	70g
Total Nitrogen (TN)	195g	15g
Total Phosphorus (TP)	22.5g	2.5g

Effluent Compliance: AS1546.3:2017		
Biochemical Oxygen Demand (BOD^5)	<10mg/l	
Total Suspended Solids (TSS)	<10mg/l	
E.Coli	<10cfu/100ml	
Min. FAC	Min 0.5 mg/l	

Temperature		
Operating Temperature C°	Minimum	Maximum
	-2°C	45°C

Electricity Consumption	
Kilowatt hours per day (kWh/d)	2.50
Kilowatt hours per 1000L (kWh/1000L)	1.33

Servicing and Maintenance	
Servicing Frequency	Every 3 months

Components List & Repair/ Replacement Instructions:

1. Primary Chamber – 100mm inlet Junction, BIO Block
2. Secondary Chamber – 100mm Junction x 2
3. Aeration Chamber – 100mm Junction x 2, BIO Block, Air Lift, Disk Diffuser
4. Clarifier Chamber – 100mm Junction, Taylex Filter Control, Recirculation Chamber
5. Irrigation Chamber – 100mm Junction, Chlorine Dispenser, Irrigation Pump, High Level Alarm Float, 100mm Elbow

Component List

TANK

Polyethylene Tank and Lid
Multi-chambered monolithic poly tank made using a sandwiched, closed-cell foam polymer manufacturing method.

Repair / Replacement Details:
Replacement lids available from Taylex or your local Service Agents.

Cracks can be repaired using a poly welder.



1) 100mm Sweep Tee With dropper pipe and riser
2)

Repair / Replacement Details:
3) Replacement tee and pipe can be purchased from a local plumbing store. Cut 100mm pipe at wall and using a 100mm slab repair coupling install new tee.

5)



4) BIO Block Media
Width - 385mm
Length - 110mm
Height - 1400mm
Surface Area – 20.6m^2



6) 100mm Sweep Tee With 1000mm dropper pipe and 100mm 45° M&F Bend

Repair / Replacement Details:
Replacement tee and pipe can be purchased from a local plumbing store. Cut 100mm pipe at wall and using a 100mm slab repair coupling install new tee.



7)	Diffuser x 2 Material – EPDM Diameter – 250mm (9 inch) Repair / Replacement Details: Turn the system off. Replace the diffuser by making a new complete aeration pipe assembly fitted with the Diffuser. Cut the main aeration supply line, place the new diffuser in the system, weighed down with a small concrete block and rotate the diffuser under the biomass. Re fix the new aeration pipe assembly complete with a joining socket. Removing the old Diffuser is not required. Turn the system on. Purchase the complete assembly from Taylex.	
8)	BIO Block Media Width - 550mm Length - 1100mm Height - 500mm Surface Area - 105m^2	
9) 10) 13)	100mm Sweep Tee With dropper pipe and riser Repair / Replacement Details: Replacement tee and pipe can be purchased from a local plumbing store. Cut 100mm pipe at wall and using a 100mm slab repair coupling install new tee.	
11) 12)	Recirculation System For the transfer of fluids using the 'Venturi Principle'. Air is injected toward the base of a vertical open ended PVC conduit. Continuous displacement occurs as the air moves vertically to the liquid, drawing liquid through the bottom of the conduit. The air/liquid mixture reaches a vertical maximum where it then moves through the 90° bend into the primary chamber. The conduit is arranged in the base of the clarifier so that the residual sludge constitutes the main vacuum target. Sludge Base Removal Sludge deposit removal is to be scheduled 1 time per 6 years or as determined necessary by a licenced Taylex Sales Technician or the client or due to mechanical failure. Servicing Routine maintenance/servicing of the Taylex PABSNR -2000 is to be scheduled quarterly or as determined necessary by an approved Taylex Sales Technician or due to mechanical failure. Refer to Field Service Report sheet for testing requirements. Repair / Replacement Details: Turn the system off. Replace the Sludge Recirculation Assembly by cutting the main line and installing the new assembly with a joining socket. Turn the system on. Purchase the complete assembly from Taylex.	

12) Taylex Filter Control (TFC)
Material – Stainless steel

Repair / Replacement Details:
Replace the TFC assembly by cutting the 100mm slab repair coupling, install the replacement TFC assembly.



14) Chlorine Dispenser
Material – HD Polyethylene
Length – 500mm
Diameter – 90mm

The chlorine dispenser is placed in the 100mm Tee located in the irrigation chamber.

Repair / Replacement Details:
Repairing the Chlorine Dispenser is not recommended. If the Dispenser is damaged, replace it with a new unit. Purchase the complete assembly from Taylex.



15) Irrigation Pump
The irrigation pump is self-controlled via a ball bearing activated float switch. When the according volume is reached in the pump chamber, the ball bearing in the float moves and creates an active connection. The treated effluent is pumped to the approved dispersal zone, as the chamber reaches minimum volume, the float drops and de-activates the pump. The type and capacity of the pump will be in accordance with the land application requirements.

Repair / Replacement Details:
Turn the system off. Replace the pump by disconnecting the barrel union, be sure not to drop the internal valve assembly. Lift the Pump Assembly out of the tank. Undo the threaded fitting connect to the outlet of the pump. Re apply thread tape and fix the threaded fitting back onto the pump. Return the assembly to the tank and re-connect the barrel union, ensuring the valve is seated correctly. Turn the system on. Purchase the correct pump from Taylex or a local outlet, ensuring the performance is identical to the pump removed.

DAVEY D25 – 9m Head	DAVEY D42A/B3 – 32m Head
Voltage – 220 ~240 IP 68	Voltage – 220 ~240 IP 68
AMPS – 1,9 Phase 1 50hZ	AMPS – 4,3 Phase 1 50hZ
Max Flow – 200L/min 7m	Max Flow – 130L/min 7m



17) Alarm System High Water
Material – PVC
Length – 20mm
Width - 90mm
Trigger – High Water
Code – 3
Visual – Red L.E.D - 3 Flashes
Audible – Micro Buzzer
Voltage – 12V

Repair / Replacement Details:
Turn the system off. Replace the float by disconnecting the electrical connection in the terminal block, located in the lower section of the control box. Feed the new float cable into the control box and connect to the terminal block, fixing the screws firmly. Re fix the float to the pipe assembly and loop the lead around the barrel union, to set the float height. Turn the system on. Purchase the float from Taylex.



18) Non- Return Valve
Height – 85mm
Length – 140mm
Width – 85mm

Repair / Replacement Details:
Turn the system off. Replace the Non- Return Valve by cutting the pipe in either side of the valve. Re-join the pipe using sockets and glue the Valve and sockets together. Ensure the glue is set before turning the system back on.



19) Control Panel Box
Material – HD Polyethylene
Height – 210mm
Length – 190mm
Width – 85mm

The weather proof control box is fixed to the side of the blower box using stainless steel screws. The control panel is fitted to the inside of this box and is connected to the power, high water alarm and pressure switch, via a gland at the back of the box.

Repair / Replacement Details:
Repairing boxes is not recommended. Replacements boxes be purchased from Taylex or your local service agent.



20) ECO Control Panel
(240v to 12V Power Supply)
Length – 160mm
Height – 100mm

The Taylex ECO is a 12V controller powered by the 240v to 12v power supply plug. As the unit is 12V all works including replacements and repairs do not need to be completed by a Licenced Electrician. All service agents can therefore complete all works within the Control Box and on the Taylex ECO Controllers.

The Taylex ECO Controller Assembly (complete with Controller, Control Panel Box, 3 x GPO Assembly and Blower Box) is classed as electrical equipment and has been certified to comply with AS/NZS 3820, meeting the Electrical Safety requirements in Australia and New Zealand

Repair / Replacement Details:
Turn the system off. Replace the Control Panel by removing the 4 screws in the control box. Disconnect the Loom plug from the rear of the panel. Connect the loom to the new panel; return the new Control Panel to the control box and re fix the 4 screws. Turn the system on. Purchase the Control Panel from Taylex.



21) L.E.D Light
Height – 30mm
Length – 20mm

The LED visual alarm is constructed within the Eco Panel. This LED Red light will flash when an alarm is present. The number of flashes represent the particular code.

Repair / Replacement Details:
Replacement of the LED lights only is not possible; the complete Control Panel must be replaced. Purchase the Control Panel from Taylex.



22) Blower Box
Material – HD Polyethylene
Height – 350mm
Length – 600mm
Width – 400mm

The Blower boxed is fitted to the lid of the ABS using 4 x 30mm anchors.

Repair / Replacement Details:

Repairing boxes is not recommended. Replacement boxes can be purchased from Taylex or your local service agent.



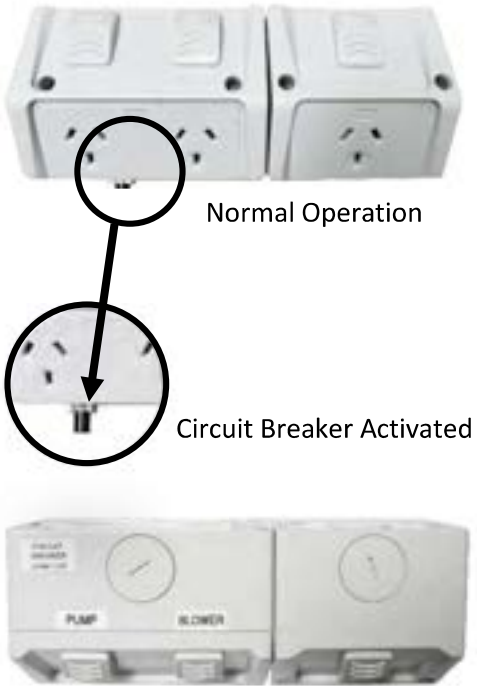
23) Weatherproof GPO's

Single	Double
Height – 85mm	Height – 85mm
Length – 85mm	Length – 115mm
Width – 80mm	Width – 80mm

Mains 10amp power is connected through the 25mm coupling provided on the side of the PABSNR -2000 and pulled up through a conduit into the Single GPO. The 12volt power pack plugs into the single GPO to power the control panel. The blower and irrigation pump are plugged into the double GPO.

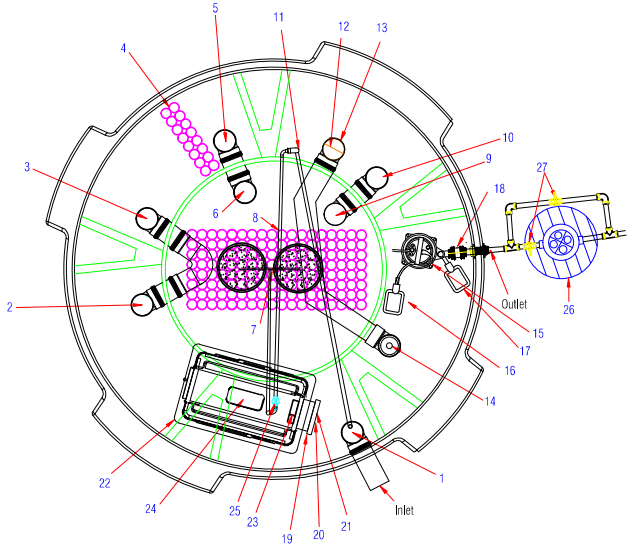
The double GPO contains a 5amp circuit breaker, which will activate if either the pump or blower (or both) draw too many amps, indicating a fault with the pump or blower. The breaker can be reset by pushing in the button if activated. The systems normal operation including alarms will continue to function, if the breaker is activated.

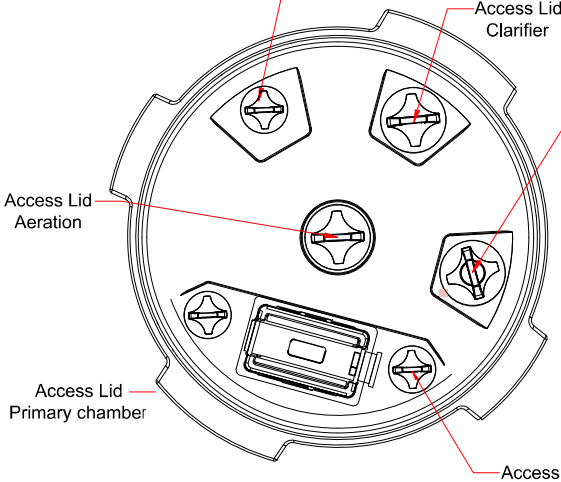
Repair / Replacement Details:
Replacing the GPO's can only be completed by a licenced electrician, please refer to the Taylex Electrical Connection instructions for details. Replacements can be purchased from Taylex or your local service agent.



24)	Nitto 120L Blower Material – Alloy / Plastic Height – 232mm Width – 210mm Length – 407mm Weight – 9.7kg Noise Rating: 40dB(A) Capacity – 120L Back Pressure Range – 5kpa – 25kpa Motor Power – 130 Watts Power Source – 240V 50hZ Repair / Replacement Details: Purchase replacement Blowers and parts from Taylex.	
25)	Recirculation Control Valve The Recirculation system has been designed to recirculate a precise volume of bacteria and sludge back to the primary chamber for denitrification and sludge management. The control valve should be set to '10' on the dial for optimum operation. Repair / Replacement Details: Turn the system off. Replace the Recirculation assembly by cutting the main line and installing the new assembly with a joining socket. Turn the system on. Purchase the complete assembly from Taylex.	

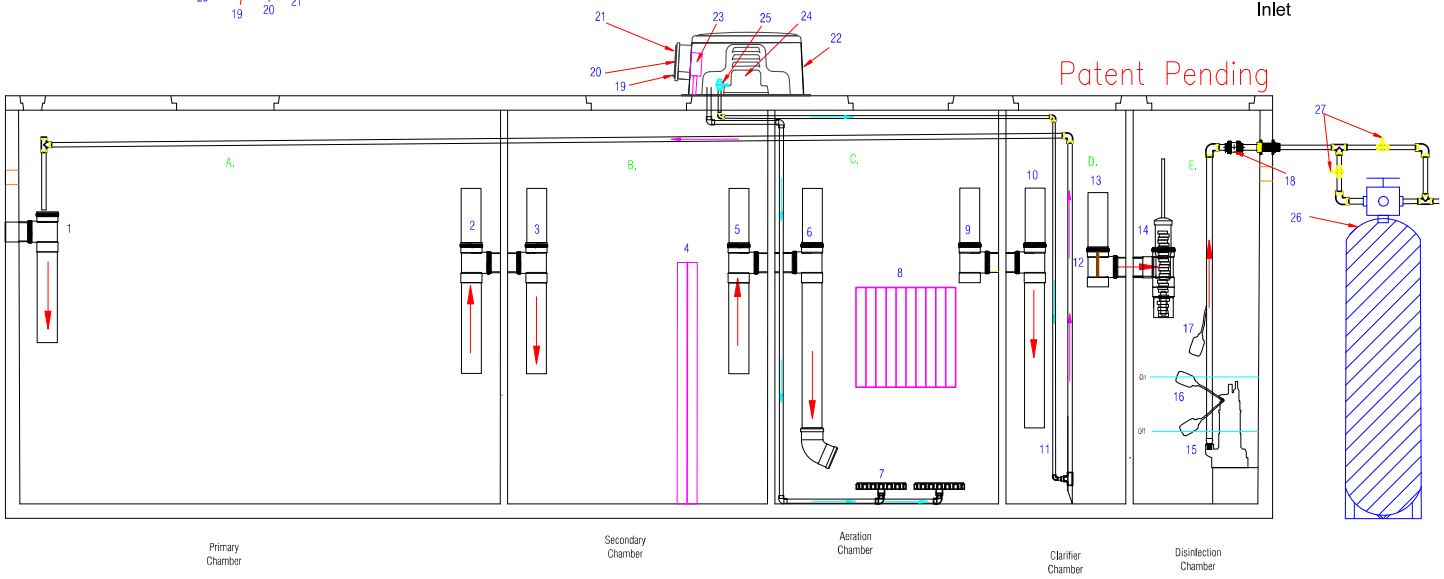
Patent Pending





DEPARTMENT OF HEALTH
APPROVED
18 Apr 2023
CHO
OF WA

Patent Pending



TANK DETAILS

TAYLEX WASTEWATER

Poly Tank

	CHAMBER	CAPACITY 'L'
A	PRIMARY	1646
B	SECONDARY	881
C	AERATION	2053
D	CLARIFIER	663
E	IRRIGATION	665
	EMERGENCY STORAGE	1541

WORKING VOLUME 5908 Litres

TOTAL VOLUME 7449 Litres

INDEX

1. PVC JUNCTION 100MM X 90
2. PVC JUNCTION 100MM X 90
3. PVC JUNCTION 100MM X 90
4. BIO BLOCK
5. PVC JUNCTION 100MM X 90
6. PVC JUNCTION 100MM X 90
7. DISK DIFFUSER
8. BIO BLOCK
9. PVC JUNCTION 100MM X 90
10. PVC JUNCTION 100MM X 90
11. RECIRCULATION
12. TFC (PATENT PENDING)
13. PVC JUNCTION 100MM X 90
14. CHLORINE DISPENSER
15. IRRIGATION PUIMP
16. IRRIGATION PUIMP FLOAT CONTROL
17. HIGH LEVEL ALARM
18. NON-RETURN VALVE
19. ECO-PANEL BOX
20. ECO-PANEL CONTROL
21. ECO-PANEL ALARM LIGHT
22. BLOWER BOX
23. WEATHERPROOF GPO'S
24. BLOWER
25. RECIRCULATION AIR COCK
26. TALL SAND FILTER
27. CONTROL VALVES

Taylex WASTEWATER

DESIGNED:	DE	DATE: 14.09.2022	STATUS:	DESIGN
DRAWN:	CZ		SCALE:	NTS
CHECKED:	KQ			
CAD FILE:				

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CLIENT: Taylex Australia Pty Ltd

PROJECT: Certification Drawing

TITLE: PABSNR 2000+P

DRAWING No.: 1 of 1

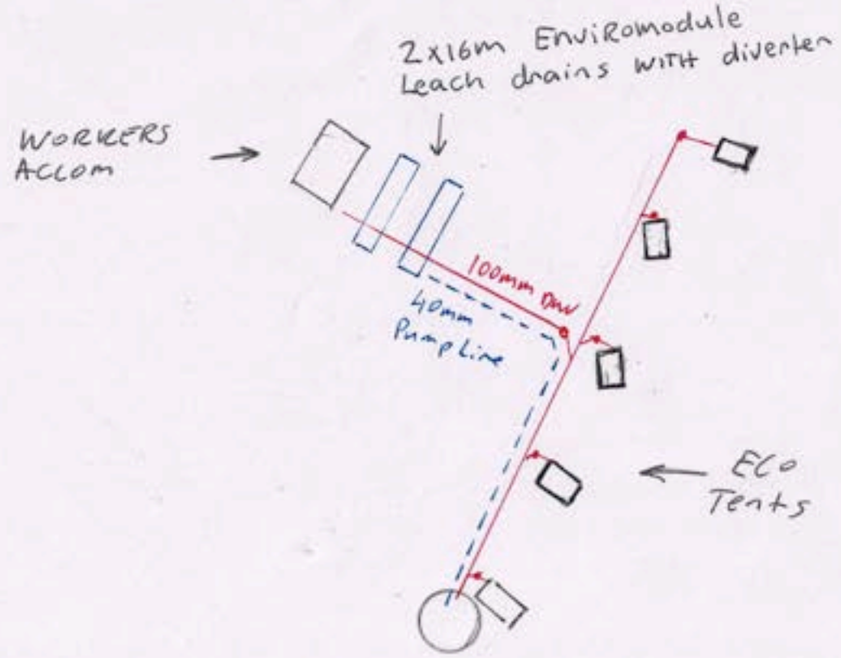
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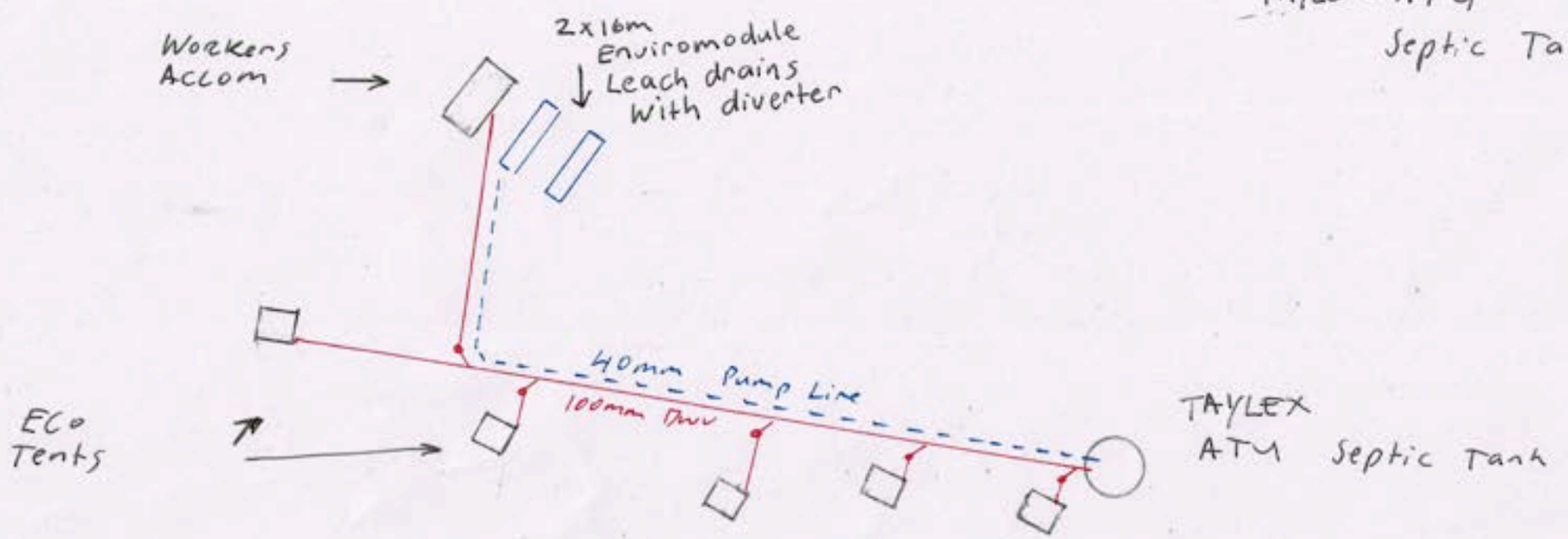
ISSUE No.:

NORTH

100mm Sewer Drain

40mm Pump Lines to Leach drains





Joel Small PI 8999

Appendix B

Transport Impact Statement

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PROPOSED RECEPTION CENTRE AND SHORT-STAY ACCOMMODATION

LOT 112 (43) HORSE HILL RD, BREMER BAY

LOCAL AUTHORITY: SHIRE OF JERRAMUNGUP

TRANSPORT IMPACT STATEMENT

Final

Prepared by i3 consultants WA for

Planning Outcomes WA

Prepared by

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Description

A Transport Impact Statement for a proposed Reception Centre and ten (10) Glamping Eco-Tents on Lot 112 Street Number 43 Horse Hill Rd within the Shire of Jerramungup locality of Bremer Bay prepared in accordance with the WAPC 2016 Transport Impact Assessment Guidelines.

Client

Planning Outcomes WA

Project ID 13811
Version Final
Publication Date 8 July 2026
Pages 42
File Name i3c13811-TIS-F

This is not an approved document unless certified here.

About the Author

David Wilkins is an RTA NSW Certified Level 3 Lead Auditor (RSA-08-0178) and Main Roads Western Australia (MRWA) accredited Senior Road Safety Auditor (SRSA 0101). In addition to this, David is an MRWA accredited Crash Investigation Team Leader and Roadworks Traffic Manager (MRWA-RTM-10-RTM20). David has undertaken over 730 road safety audits in Australia since 2001 across the full range of stages from feasibility through to pre-opening, including roadworks, existing roads, schools, events & mine sites.

David specialises in undertaking and preparing traffic impact assessments in accordance with either the WAPC *Transport Impact Assessment Guidelines* or Austroads *Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments* (1). David has authored over 250 of these since 2001.

David is a past member of Engineers Australia and committee member of Transport Australia society and is still guided by its Charter and Code of Ethics which states that its members act in the interest of the community, ahead of sectional or personal interests towards a sustainable future.

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Executive summary

Proposal

A proposed Reception Centre and Short-stay Eco-Tent Glamping Sites on Lot 112 Street No 43 Horse Hill Rd, Bremer Bay as shown in the Development Drawings in **Appendix A**.

Forecast Impact

The following diagram is based on the WAPC traffic impact definitions and shows the assessed forecast impact of the development in this context, i.e.: 'Moderate'.

Max 55 trips: 1 trip every 1 min 5 secs

Trips per hour	0	5	10	15	20	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95	100	105	110	115	120
Impact Description	Negligible		Low	<< Moderate >>																		High >>			
1 trip every mm:ss	00:00	12:00	06:00	04:00	03:00	02:24	02:00	01:43	01:30	01:20	01:12	01:05	01:00	00:55	00:51	00:48	00:45	00:42	00:40	00:38	00:36	00:34	00:33	00:31	00:30

Figure 1 – Assessed Forecast Impact of proposed development in terms of additional trips in each peak hour and the WAPC definition of Low, Moderate and High Impacts

Refer **Section 6:** Daily traffic volumes and vehicle types of this TIS report for determination of these forecast volumes and additional information and assessments.

Recommended remedial measures

This TIS has not identified any warrant for physical remedial measures as a result of the proposed development. It does however recommend that an **Operational Traffic and Parking Management Plan** is developed and used that addresses all the following:

- all guest, staff, supplier and bus parking to occur on-site.
- no event parking on Horse Hill Rd, Point Henry Rd or Magpie Rise.
- guest arrival and departure instructions to be issued before each event.
- service deliveries and waste collection to occur during daytime hours.
- dust management for internal unsealed access roads during event periods.
- no parking on internal access roads required for emergency access.
- event staff or marshals to direct vehicles during larger weddings.
- bus/ charter transport to be encouraged for larger weddings.
- any overflow parking to remain within the site.

It is also recommended that:

- The Shire and Main Roads WA assess the safe operating speed of Point Henry Rd on the bend north of Horse Hill Rd intersection and consider a reduced speed limit or curve warning/ advisory speed signage, regardless of the proposed development as this is an existing safety issue.
- The Bushfire Management Plan and Bushfire Emergency Plan confirm that the proposed internal access routes, passing opportunities, gates, road widths, turnarounds and emergency access arrangements are consistent with the bushfire consultant's recommendations.

Subject to the above, the traffic and parking component of amenity impact is capable of being managed.

1 Introduction

This Transport Impact Statement (TIS) has been prepared in accordance with Volume 4 (Individual Development) of the WAPC publication Transport Impact Assessment Guidelines (2).

Table 1 of Volume 4 of the WAPC Guidelines indicates the level of TIA required by land use and size. It has been reproduced as Table 1 below.

The guidelines indicate that a Transport Impact Statement (TIS) is required for proposed entertainment venues that accommodate between 100 and 1,000 persons.

The proposed development is designed to accommodate up to 120 wedding guests and 20 people (10 x couples) in Eco-Tents. It therefore warrants a TIS.

LAND USE	MODERATE IMPACT	HIGH IMPACT
	Transport Impact Statement required	Transport Impact Assessment required
	10 – 100 vehicle trips in the peak hour	> 100 vehicle trips in the peak hour
Residential	10–100 dwellings	>100 dwellings
Schools	10–100 students	>100 students
Entertainment venues, restaurants, etc.	100–1000 persons (seats) OR 200–2000 m² gross floor area	>1000 persons (seats) OR >2000 m² gross floor area
Fast food restaurants	50–500 m² gross floor area	>500 m² gross floor area
Food retail /Shopping centres with a significant food retail content	100–1000 m² gross floor area	>1000 m² gross floor area
Non-food retail	250–2500 m² gross floor area	>2500 m² gross floor area
Offices	500–5000 m² gross floor area	>5000 m² gross floor area
Service Station	1–7 refuelling positions	>7 refuelling positions
Industrial/Warehouse	1000–10,000 m² gross floor area	>10,000 m² gross floor area
Other Uses	Discuss with approving authority	Discuss with approving authority

Table 1 – Land use warrants for Transport Impact Statements and Assessments

Section 6 of this TIS indicates that the proposed development is expected to generate up to 55 vehicle trips during its busiest hour. This is consistent with a Moderate Impact requiring a TIS, i.e. 10–100 peak hour trips (refer **Table 1**).

Volume 4 of the WAPC Guidelines states:

"A transport impact statement is a brief statement outlining the transport aspects of the proposed development. The intent of the statement is to provide the approving authority with sufficient transport information to confirm that the proponent has adequately considered the transport aspects of the development and that it would not have an adverse transport impact on the surrounding area.

It is envisaged that the transport impact statement will generally be from two to three pages up to several pages in length, but this will depend upon the number and nature of any specific issues that need to be addressed.

It is expected that most, if not all, of the information to be provided will be of a non-technical nature, that is, will not require input from a specialist in transportation planning or traffic engineering. This will, however, depend upon the nature of the specific issues to be addressed and specialist technical input may be required on occasions."

The preparation of a TIS in accordance with the WAPC Guidelines is consistent with, and ensures compliance with, Clause 67(t) of the Planning and Development (Local Planning Schemes) Regulations 2015 (3), i.e.:

In considering an application for development approval the local government is to have due regard to the following matters to the extent that, in the opinion of the local government, those matters are relevant to the development the subject of the application — (t) the amount of traffic likely to be generated by the development, particularly in relation to the capacity of the road system in the locality and the probable effect on traffic flow and safety.

2 Proposed development

- **Show on a plan/ describe the proposed development land uses and their quantities (for example, retail floorspace, number of dwellings);**
- **Comment on any existing uses or changes of use;**
- **Show on a plan/ describe the development's relationship/context with the surrounding land uses.**

The proposed development comprises of 10 Eco-Tents and Reception Marquee with toilets and ancillary accommodation on a site with an existing house, shed and workers accommodation, as shown in **Figure 2** on page 9.

Each Eco-tent is designed for short stay accommodation for a couple. The Reception Marquee and Toilets are designed to accommodate up to 120 guests.

The Site is located within the Great Southern Region. Its geology is dominated by granite massifs and outcrops, numerous bays with white sandy beaches, and extensive open spaces with native vegetation.

The Site is located within proximity to the following features:

- Perth – 510 km / 5.7hr (by road);
- Albany – 190 km / 2.1hr;
- Jerramungup – 90 km / 1.1hr;
- Bremer Bay – 10 km / 10min;
- Numerous National Parks;
- Southern WA – Regional tourist destination
- Indian Ocean – Views, whale-watching, fishing & swimming

A map showing distances and driving times to and from Albany, Jerramungup and Perth is provided as **Figure 3** on page 10.

In terms of surrounding land uses, the site is zoned Rural and adjoins a mix of rural, rural-residential and coastal reserve land. To the north and west, the surrounding area has a rural-residential character, with scattered single houses on large lots rather than an urban residential pattern. To the south, the land remains rural and largely vacant. To the east, the property adjoins the coastal foreshore reserve/ Recreation and Open Space reserve, providing a natural coastal interface rather than a developed urban edge.

This TIS assesses only the current proposal comprising the reception centre, 10 eco-tents, associated parking, access, service areas and supporting facilities. It does not assess any future caravan bays, chalets, additional accommodation or expanded tourist park use. Any future expansion would require separate assessment.

3 Vehicle access and parking

- **Show on a plan/ describe the vehicle access arrangements to the development from the frontage road(s);**
- **Show the locations and indicate the number of proposed public and/or private car and disabled parking spaces and the provision for set down, pick up and taxis (if appropriate);**

Vehicle access to the proposed development is provided from the site's existing rural road frontages, primarily via Horse Hill Rd with an additional access point from the extended public road (Magpie Rise) along the northern boundary, as shown in **Figure 2** on page 9.

The proposal provides 63 on-site parking spaces in total. These are private on-site spaces associated with the wedding venue, accommodation and servicing of the development, rather than public on-street parking. The proposed parking type and provision is described in Table 2 below.

Parking type	Proposed provision
Dwelling	2 bays
Workers Accommodation	2 bays
Ancillary Accommodation	1 bay
Eco-tents	18 bays
Eco-tent ACROD/ disabled parking	1 bay
Wedding guest parking	30 bays
Wedding ACROD / disabled parking	4 bays
Delivery / service parking	4 bays
Bus parking	1 bay
Total	**63 bays**

Table 2 – Proposed parking provision

Accessible bays are proposed and are to be designed in accordance with AS2890.6 and connected to accessible paths of travel where required.

The plans and report do not identify a separate formal taxi rank or dedicated set-down/ pick-up bay. However, the proposal includes a dedicated bus bay, additional delivery/ service bays, internal 6 m access and manoeuvring, and footpath access, which would allow set-down and pick-up activity to occur within the site rather than on Horse Hill Rd. Section 4.8 (Transport Considerations) of the Town Planning Report prepared by Planning Outcomes WA (July 2026) demonstrates compliance with the parking requirements of the Shire of Jerramungup Local Planning Scheme No 2 (LPS2) (4) requirement and includes wide manoeuvring for buses, supporting on-site passenger loading and unloading.

Parking is proposed to be managed entirely on-site, with no reliance on parking along Horse Hill Rd Magpie Rise or Point Henry Rd.

- **Include details of parking management**

As advised earlier, the proposed development provides a total of 63 marked parking bays, comprising wedding guest, accommodation, ACROD, delivery/ service and bus parking.

As the Shire of Jerramungup Local Planning Scheme No. 2 does not prescribe a specific car parking rate for a "Reception Centre" land use, the parking requirement is to be determined by the local government in each particular case, having regard to the nature and scale of the proposal.

The proponent's town planner has assessed the Scheme parking requirement as 12 car parking bays. This is understood to be a statutory planning assessment of the minimum Scheme requirement, rather than a forecast of actual peak parking demand for the venue.

Notwithstanding the above, the proposal provides a substantially higher level of on-site parking, with 63 parking spaces proposed in total, comprising wedding guest parking, accommodation parking, accessible parking, service/delivery parking and a bus bay. This provision exceeds the town planner's assessed minimum requirement and has been adopted to ensure that parking demand associated with peak wedding events, staff, accommodation guests, service vehicles and group transport can be accommodated wholly within the site.

On this basis, the proposed parking supply is considered appropriate for the scale and operation of the development, subject to all event, staff, accommodation, service and bus parking being managed on-site, and no reliance being placed on parking along Horse Hill Rd, Point Henry Rd or Magpie Rise.

Parking management is proposed as per **Table 3** on the following page.

Management item	Proposed arrangement
Visitor parking	Wedding guests to be directed to the designated on-site parking area, with 30 wedding bays provided.
Accommodation parking	Guests staying in the eco-tents to use the 18 accommodation bays, separate from the wedding parking allocation.
Accessible parking	4 ACROD/ disabled bays are proposed in total: 3 associated with the wedding use and 1 associated with the accommodation use.
Bus/ group transport	1 dedicated bus bay is provided, designed to Australian Standard dimensions, with wide manoeuvring and footpath access.
Servicing and deliveries	5 delivery/ service bays are provided, allowing suppliers, food trucks, waste collection and operational vehicles to park clear of guest areas.
Internal circulation	The parking and access areas include 6 m manoeuvring, with vehicles contained within the internal driveway system.
Surface treatment	Driveways are proposed to remain unsealed to retain the rural character of the locality, while the parking bays are proposed larger than the Scheme standard.
Wayfinding	Entry statement signage is proposed to identify the business, guide drivers on-site and support safe and efficient circulation.

Table 3 – Proposed Parking Management

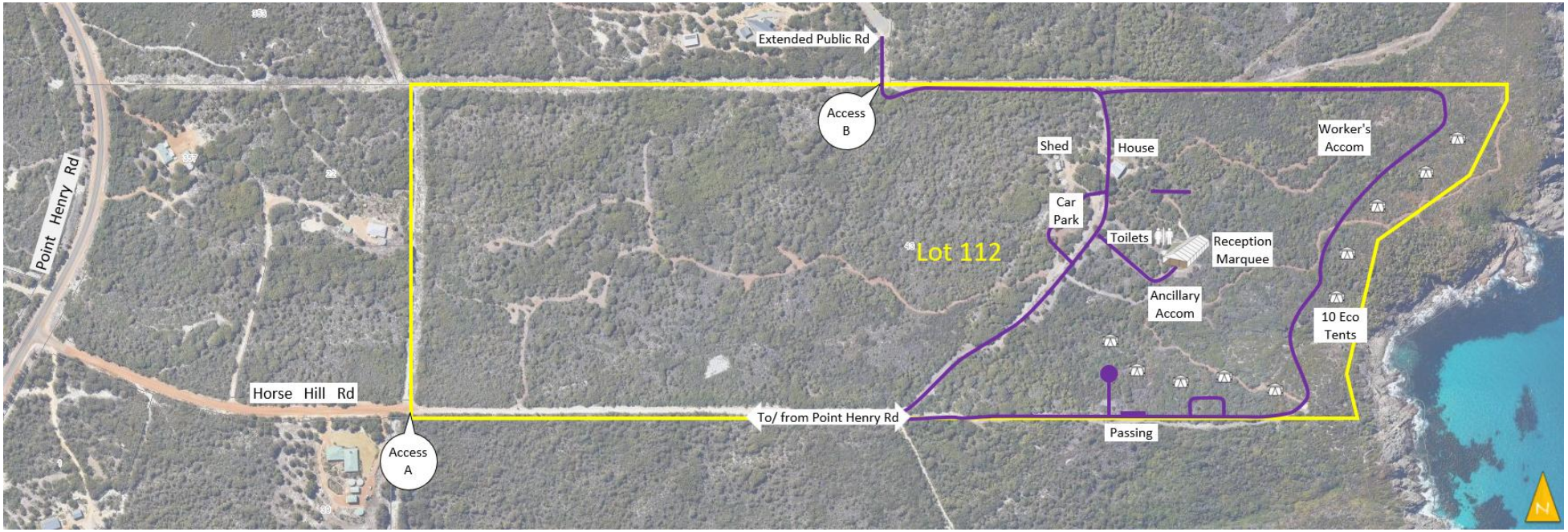


Figure 2 – Proposed and existing development on Lot 112

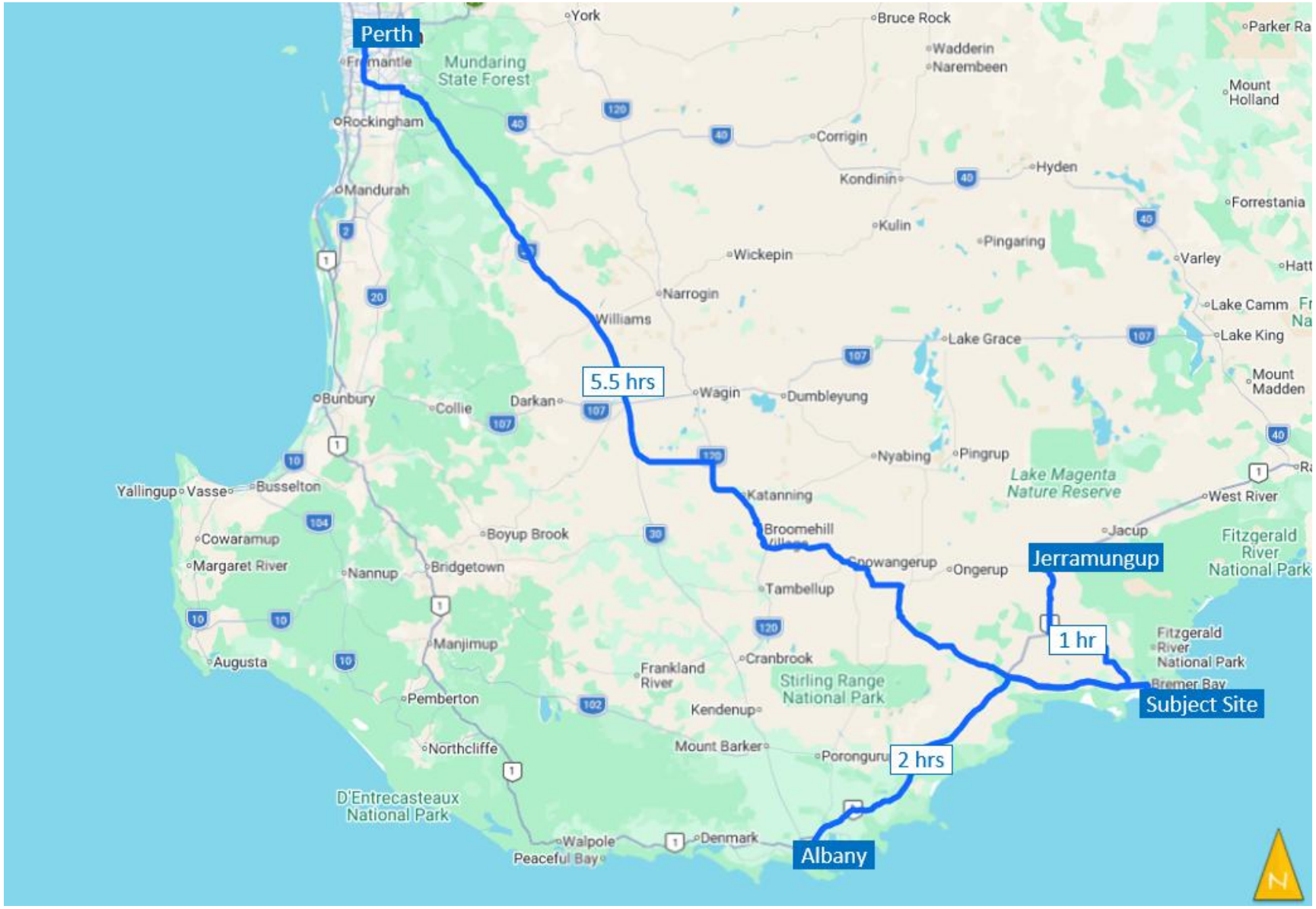


Figure 3 – Regional context

4 Provision for service vehicles

- **For the non-residential developments (or the non-residential components of mixed use developments), briefly describe/ show the access arrangements and on-site loading or unloading facilities for service vehicles;**
- **For residential developments, discuss/ show the access to the site for rubbish collection and emergency vehicles**

Service vehicle access is accommodated via the same internal access network as guest vehicles, with entry from the frontage road system via Horse Hill Rd/ Access A and the secondary northern access from the extended public road (Magpie Rise)/ Access B, as shown in **Figure 2** on page 9.

Once on-site, service vehicles can circulate along the internal rural driveways to the wedding, accommodation and utility areas. The proposal provides five dedicated delivery/ service bays, allowing suppliers, food vans, waste collection and maintenance vehicles to load and unload within the site rather than on Horse Hill Rd or other frontage roads.

The parking/ access schedule also identifies 6 m access and manoeuvring, additional provision for truck and service vehicles, and a dedicated bus bay, indicating that loading, unloading and passenger servicing are intended to occur within the development area and clear of the public road network.

5 Hours of operation

For non-residential developments only, outline the proposed hours of operation.

The proposed hours of operation are shown in **Table 4** below.

Activity	Proposed hours / timing
Wedding events	Friday to Sunday, **12:00 noon to 12:00 midnight**
Wedding frequency	Generally **1 wedding per week** during the wedding seasons
Wedding seasons	**September–November** and **February–April**
Guest departure pattern	Older guests and families with young children are expected to start departing from around **9:00 pm**
Wellness events	**1 per week** during **December–January**, outside the wedding season
Short-stay accommodation	Bookings of **2–6 nights**
Site management	On-site management from the existing homestead

Table 4 – Proposed Hours of Operation

The proposal therefore operates as a low-frequency event and short-stay accommodation use, with wedding activity concentrated on weekends and ceasing by midnight.

6 Daily traffic volumes and vehicle types

- **For non-residential developments, provide where possible a rough estimate of the likely daily, and/ or peak, traffic volumes generated by the development, split by types of vehicle, for example, car, light commercial or heavy commercial.**

Note that this is not intended to be a comprehensive assessment carried out by a transport specialist but a rough guide only to the amount and type of traffic likely to be generated.

The proposed development is forecast to generate up to 55 vehicle trips in its busiest hour with the maximum of 120 wedding guests, 20 Eco-tent patrons and all staff associated with this, as shown in **Table 5** below.

	Max	Max						Peak Hour Trips							
		Private Car		Charter Bus		Drop-off/ Pick-up*		Wedding Arrival				Wedding Departure			
		Car	People	Bus	People	Car	People	Car IN	Car Out	Bus In	Bus Out	Car IN	Car Out	Bus In	Bus Out
Wedding Guests	120	20	60	1	40	14	20	26	11	1	1	11	26	1	1
Wedding Staff	12	4	6	0	0	2	6	5	1	0	0	0	0	0	0
Eco-Tents	10	10	20	0	0	0	0	5	5	0	0	5	5	0	0
Eco-Tents Staff	2	1	2	0	0	0	0	1	1	0	0	1	1	0	0
							Totals	**36**	**17**	**1**	**1**	**16**	**31**	**1**	**1**
								53		**2**		**47**		**2**	

Table 5 – Estimated maximum peak hour trips

In summary, the development is expected to generate approximately 100 light-vehicle movements during the busiest hour during an event, plus around 4 bus movements and a small number of service/ commercial vehicle movements. The highest traffic period is expected during wedding arrivals, with about 53 car movements and 2 bus movements in the peak hour, followed by the departure peak with about 47 car movements and 2 bus movements.

Forecast Daily and Annual Traffic Volumes are shown in **Table 6** below.

Trip Period	Trips		Basis of assessment
	LVs	Buses/ HVs	
Arrival Peak	53	1	75% of car guests and a bus arrives or departs during the peak hour
Departure Peak	47	1	
Max Daily	194	4	(1.25 x Arrival Peak + 1.25 x Departure Peak + 2 Service Vehicles) x 2 (Trips IN + Trips OUT) + 10 staff trips
Ave 2 days per week	388	8	
Average Annual Traffic Volumes	**10,075**	**208**	Based on 50% of the year, i.e. 2 days each week for 26 weeks of the year
	10,283		

Table 6 – Forecast Daily and Annual Traffic Volumes

For context, a single rural residential dwelling is forecast to generate up to 8 vehicle trips per day, which equates to up to 2,912 trips per annum. On this basis, the forecast annual trip impact of the proposed development is equivalent to that generated by 3-4 rural residences.

7 Traffic management on frontage streets

- **Describe/ show the existing traffic management on the roads fronting the development and for 100 metres either side of the development.**
- **Information to include:**
  - **road width/ number of lanes;**
  - **footpaths/ cycleways;**
  - **any parking provision or restrictions;**
  - **posted traffic speed;**
  - **intersections and type of control (for example, give way, roundabout**
  - **accesses/ driveways to properties**

Based on the aerial and site photographs, the existing traffic management around the Lot 112 frontage is typical of a low-volume rural/ coastal road environment.

Item	Existing arrangement
Frontage road (Main Access)	The development fronts Horse Hill Rd (Local Road 3180119), which is an unsealed local rural road along the southern side of Lot 112.
Road width/ lanes	Horse Hill Rd operates as a two-way unsealed road with no marked centreline. The measured formation width near the site is approximately 8.2 m to 9.7 m, narrowing/ transitioning toward the site access. Point Henry Rd (Local Road 3180116) is a sealed 6.2 m wide local road. Magpie Rise (Local Road 3180237) is a sealed local cul-de-sac road, approximately 6.5 m wide.
Footpaths/ cycleways	No constructed footpaths, shared paths or dedicated cycle lanes are evident on Horse Hill Rd, Point Henry Rd or Magpie Rise in the vicinity of the site. Pedestrian and cyclist activity occurs on the roads or verges.
Parking provision/ restrictions	No formal on-street parking bays, parking restriction signs or line-marking is provided. Any existing stopping/ parking is informal on the road shoulder/ verge, consistent with the rural road environment.
Posted speed	No speed limit signs were identified from the available desktop review. The applicable speed environment should be confirmed with the Shire/ Main Roads WA. For the purpose of the safety review, the conservative outside-built-up-area default speed environment has been considered unless otherwise confirmed.
Intersections/ control	Horse Hill Rd forms a rural T-intersection with Point Henry Rd. The intersection is not channelised, or sign controlled and has a wide sealed bell mouth with the seal extending 40 m west from Point Henry Rd.
Accesses/ driveways	Several rural property accesses are present within approximately 100 m of the site frontage, including the existing Lot 112 access from Horse Hill Rd, a driveway/ access opposite or near No. 39 Horse Hill Rd, and local accesses connecting to Magpie Rise and surrounding rural-residential lots.
General traffic management character	The roads are rural in character, with no kerbing, no traffic calming, no lane marking on Horse Hill Rd, limited formal roadside infrastructure and informal gravel shoulders/ verges.

Table 7 – Traffic management on frontage streets

8 Public transport access

- **Identify/ show the nearest bus and train routes to the development and the locations of the nearest bus stops and train stations.**
- **Describe/ show briefly the pedestrian and cycle links between the development and the bus stops and train station**

The development has very limited access to public transport and would be expected to be primarily car, bus/ charter coach or private transfer based.

The nearest identified regular public coach service is the Transwa Perth–Esperance / Esperance–Perth coach route, which stops at Jerramungup Lions Park on South Coast Highway. Bremer Bay itself does not appear to be served by a regular Transwa coach stop.

The nearest bus stop is at Jerramungup Lions Park, approximately 90 km/ about 1 hour from the subject site.

The nearest regional coach interchange is in Albany, approximately 190 km/ about 2 hours from the site. Transwa's GS3 coach service terminates at Albany, opposite the railway station.

There are no passenger rail stations or lines in Bremer Bay, Jerramungup or Albany.

There are no practical pedestrian or cycle links between the development site, and the nearest public bus/coach stop at Jerramungup due to the long distance of around 90 km, the rural road environment, and the absence of continuous footpaths, shared paths or dedicated cycle facilities.

Similarly, there is no realistic pedestrian or cycling connection to a train station. Any use of public transport would require a private vehicle, shuttle, taxi, charter bus or organised transfer between the site and the relevant coach stop or regional centre. For weddings and accommodation guests, the more practical public transport-related arrangement would be pre-arranged charter coach or private transfer rather than reliance on scheduled public transport.

9 Pedestrian access

- **Describe/ show the existing pedestrian facilities, for example, footpaths, signalised crossings, within the development (if any).**
- **Describe/ show any proposed pedestrian facilities within the development.**
- **Describe/ show the pedestrian facilities on the roads surrounding the development. Outline any proposals by the applicant to improve pedestrian access.**

Existing pedestrian facilities within the development are limited. The site currently comprises rural land with an existing homestead, shed and informal internal access tracks/ driveways. There are no existing formal pedestrian footpaths, shared paths, signalised crossings or marked pedestrian crossings within the development area.

As part of the proposed development, internal pedestrian facilities are proposed to connect key activity areas, including the car parking area, bus bay, reception marquee, toilet facilities and accommodation units. The proposal includes footpaths throughout the development, with accessible paths to be provided where required for disabled guests. The bus parking area is also proposed with footpath access to support safe passenger loading and unloading within the site.

On the roads surrounding the development, including Horse Hill Rd, Point Henry Rd and nearby local roads, there are no constructed footpaths, shared paths, dedicated cycleways, signalised crossings or formal pedestrian crossing facilities evident in the immediate vicinity. These roads have a rural character, with unsealed shoulders/verges and limited roadside pedestrian infrastructure.

No off-site pedestrian or cycling upgrades are currently identified as part of the proposal. Pedestrian movement associated with the development is therefore expected to be managed within the site, with guests arriving primarily by private vehicle, charter bus or organised set-down and pick-up. The internal layout should ensure that pedestrians are directed between parking, set-down areas and the venue facilities without needing to walk along the frontage roads.

10 Cycle access

- **Describe/show any existing cycle facilities, (for example, cycle parking) within the development.**
- **Describe/show any proposed cycle facilities within the development.**
- **Describe/show any existing cycle facilities on the roads surrounding the development. Outline any proposals by the applicant to improve cycle access.**

There are no existing dedicated cycle facilities within the development site. The site currently comprises rural land with existing informal internal tracks/ driveways, a homestead and shed, and there is no identified cycle parking, end-of-trip facility, shared path or dedicated internal cycle route.

The proposal does not specifically identify dedicated cycle facilities such as bicycle parking, lockers, showers or formal internal cycle paths. Given the rural/ coastal location of the site, the nature of the wedding and short-stay accommodation use, and the distance from Bremer Bay townsite and other public transport services, cycle access is expected to form a very minor component of overall travel demand. Most guests are expected to arrive by private vehicle, charter bus, organised transfer or set-down and pick-up.

On the roads surrounding the development, including Horse Hill Rd, Point Henry Rd and Magpie Rise, there are no existing dedicated cycle lanes, shared paths or formal cycling facilities in the immediate vicinity of the site. Horse Hill Rd is an unsealed rural road, while Point Henry Rd and Magpie Rise are sealed rural local roads with no marked on-road cycle lanes or off-road cycling infrastructure.

No off-site cycling upgrades are currently proposed by the applicant. Cycle access, if required, would occur informally within the existing rural road environment and internal site access network. Given the anticipated low level of cycling demand, no dedicated cycle access improvements are considered necessary as part of the proposed development.

11 Site specific issues

- **Provide details of any site specific transport issues. .**

Some flexibility is required here to address these specific issues, as they will be different for each development. The general approach should be along the following lines :

- **Describe any transport issues specific to the development, as discussed and agreed with the approving authority.**
- **Demonstrate that these will not have an adverse impact on the surrounding area, or, if they may, propose remedial measures to redress these impacts.**

Alternatively, the specific issues may relate to demonstrating that the development satisfies a certain policy objective, for example, that a development close to a major train station provides a high level of access to the station and would encourage increased use of the train.

The Shire of Jerramungup refused Development Application P26-003 for a Reception Centre, Tourist Accommodation (ECO Tents) Signage and Associated Works on the Development Site lodged in February 2026. Its reasons were detailed in its letter to the Applicant (Brodie Lee Baum) (5). A 'Schedule of Submissions' relative to the February Development Application summarised submissions received from the community and stakeholders.

A detailed assessment of the issues raised is included as **Appendix B**.

Functional capacity of surrounding roads

For the purpose of this assessment, road capacity has been considered in terms of functional or environmental capacity, rather than theoretical mid-block lane capacity (6) (7) (8) (9). This is appropriate because Point Henry Rd, Horse Hill Rd and Magpie Rise operate in a rural/ coastal and rural-residential environment, where amenity, road surface, geometry, access function, pedestrian/ cyclist activity and emergency access are more relevant than absolute traffic-carrying capacity.

Point Henry Rd is a sealed local road providing the main road connection between the Point Henry locality and the broader Bremer Bay road network. The measured sealed width near Horse Hill Rd is approximately 6.2 m.

Functionally, Point Henry Rd is best regarded as a local distributor style road rather than a simple property access road. It connects local rural-residential properties and coastal recreation destinations to the wider road network. On that basis, a functional capacity in the order of 3,000 to 7,000 vehicles per day is considered appropriate for planning assessment purposes, noting that the lower end of that range is the more relevant comparison for this rural/ coastal context.

The proposed development traffic is well below this functional capacity. Even on a peak wedding day, the development is forecast to generate in the order of approximately 100 to 134 light-vehicle movements per day, plus approximately four bus movements and a small number of service/ commercial vehicle movements. This is a small proportion of the indicative functional capacity of Point Henry Rd.

Horse Hill Rd is an unsealed local rural road fronting the development site. It operates as a two-way road with no marked centreline and a measured formation width of approximately 8.2 m to 9.7 m near the site. Horse Hill Rd / Access A is the primary visitor access for the development. Access B via Magpie Rise is to be used for emergency, management or controlled operational access only, unless otherwise required by the Shire or the **Bushfire Management Plan.**

Although the formation width is relatively generous, its unsealed surface, rural-residential context, absence of formal pedestrian/ cycle facilities, and local access function mean it should be assessed conservatively. It is most appropriately treated as an unsealed access road.

While an unsealed road can physically carry several hundred vehicles per day, its practical functional capacity is governed by amenity, dust, surface condition, maintenance and safety rather than lane capacity. For assessment purposes, and subject to maintenance, dust and amenity management, a well-formed local unsealed road can generally accommodate several hundred vehicles per day. The practical limit is governed by surface condition, dust, maintenance, geometry and amenity rather than lane capacity.

Magpie Rise is a sealed local cul-de-sac road, approximately 6.5 m wide. It serves rural-residential properties and provides access toward Short Beach and the northern side of the site.

Given its cul-de-sac form and rural-residential function, Magpie Rise should be assessed as a low-order access road. An indicative functional capacity of about 800 vehicles per day is considered appropriate, consistent with WAPC access way guidance. If treated as a narrow, low-volume access street, a notional upper figure of 1,000 vehicles per day could also be referenced, but 800 vehicles per day is the more conservative and context-appropriate value.

The development should not rely on Magpie Rise for general visitor access unless this is explicitly accepted by the Shire and assessed in the operational management arrangements. The preferred transport position is for Horse Hill Rd/ Access A to remain the primary visitor access, with Magpie Rise/ Access B used only for emergency, management or controlled operational purposes, unless otherwise required by the bushfire management documentation.

Overall, the proposed development traffic will not exceed the functional capacity of Point Henry Rd, Horse Hill Rd or Magpie Rise.

Operational Traffic and Parking Management Plan

The assessment of the access and frontage roads has indicated that whilst these are suitable for the proposed development, it would be beneficial to include a requirement for the management of the unsealed roads within an **Operational Traffic and Parking Management Plan** requiring:

- all guest, staff, supplier and bus parking to occur on-site;
- no event parking on Horse Hill Rd, Point Henry Rd or Magpie Rise;
- guest arrival and departure instructions to be issued before each event;
- bus/ charter transport to be encouraged for larger weddings;
- any overflow parking to remain within the site;
- service deliveries and waste collection to occur during daytime hours where practicable; and
- dust management for internal unsealed access roads during event periods.

Subject to these measures, the traffic and parking component of amenity impact is capable of being managed.

Legal and physical status of Access B

Section 11 notes that Access B/ Magpie Rise should not be relied upon for general visitor access unless accepted by the Shire. The applicant and/ or Shire should confirm, or flag for confirmation, whether the northern access is:

- a constructed public road;
- legally available for use;
- trafficable in all relevant weather conditions;
- available for emergency access;
- gated or ungated;
- suitable for emergency/service vehicles; and
- consistent with the **Bushfire Management Plan** and **Bushfire Emergency Plan**.

This is important because Access B is used as part of the emergency-access narrative in **Sections 11**, **12** and **Appendix B**.

12 Safety issues

- **Identify and discuss any existing or potential safety issues. Where appropriate, suggest remedial measures.**

The previous sections may have identified existing or potential safety issues that should be expanded upon. Examples of possible safety issues include:

- **an access to the development crossing a busy footpath, especially one used by school children;**
- **the development increasing traffic through a busy priority intersection;**
- **direct access onto a busy road; and**
- **the need for pedestrians/cyclists to cross a busy road to access the development.**

This section should also include a discussion of possible measures to address these issues

Existing Safety Issue

A review of the reported crash record for the five-year period ending 31 Dec 2025 for the entire length of Horse Hill Rd, including its intersection with Point Henry Rd has indicated there have not been any reported crashes during this time.

It is noted that sight distance to the north on Point Henry Rd from a location on Horse Hill Rd 5 m back from Point Henry Rd is restricted to 200 m by a 300 m radius left-hand bend and associated verge embankment.

Table 3.2 of Austroads Guide to Road Design Part 4A (6) indicates that Safe Intersection Sight Distance (SISD) of 285 m is required for approach speeds of 110 km/h. The required approach speed to match the existing available SISD at this intersection is 80 km/h, i.e.: SISD = 181 m.

Based on Equation 5 in Austroads Guide to Road Design Part 3 (7), the assessed safe operating speed for a car on a 300 m bend with 3% superelevation is 70 km/h.

Based on the above, it is recommended that regardless of the proposed development, the Shire of Jerramungup and Main Roads WA should undertake an assessment of the safe operating speed on the Point Henry Rd bend north of Horse Hill Rd and either introduce a reduced speed limit, or curve warning sign with an advisory speed sign, consistent with this.

Bushfire Vulnerability

There is a safety concern regarding vulnerability of the site to bushfires. Whilst this is primarily a bushfire planning and emergency management issue, transport is relevant because evacuation relies on available access routes, internal circulation and emergency vehicle access.

The site plan identifies two access points: Access A via Horse Hill Rd and Access B via the extended public road (Magpie Rise).

Horse Hill Rd / Access A is the primary visitor access for the development. Access B via Magpie Rise is to be used for emergency, management or controlled operational access only, unless otherwise required by the Shire or the **Bushfire Management Plan**.

The internal access network links the accommodation, reception marquee, parking areas and existing buildings, with a passing area identified on the southern internal access route. The TIS also identifies 6 m internal access/manoeuvring and service vehicle access to the development areas.

It is therefore recommended that the **Bushfire Management Plan** and **Bushfire Emergency Plan** confirm that the proposed internal access routes, passing opportunities, gates, road widths, turnarounds and emergency access arrangements are consistent with the bushfire consultant's recommendations.



Figure 4 – Aerial image of 300 m bend on Point Henry Rd north of Horse Hill Rd

References

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2. **Western Australian Planning Commission.** *Transport Impact Assessment Guidelines.* Department of Planning, Government of Western Australia. Perth, Western Australia : Western Australian Planning Commission, August 2016. p. 182, Revised August 2016. The current version of the TIA guidelines (August 2016) has been endorsed by the WAPC.

3. **Government of Western Australia.** *Planning and Development (Local Planning Schemes) Regulations 2015.* Perth : Government of Western Australia, As at 01 Jul 2016. p. 205. Version 00-d0-02.

4. —. *Shire of Jerramungup Local Planning Scheme No 2.* Department of Planning, Lands and Heritage, Government of Western Australia. Perth : Department of Planning, Lands and Heritage, 2007 (2019 Update). p. 104, Local Planning Scheme. Updated to include AMD 10 GG 20/12/2019.

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6. **Government of Western Australia.** *Liveable Neighbourhoods 2009 Update 02.* Department for Planning and Infrastructure | Western Australian Planning Commission. Perth : Western Australian Planning Commission, Jan 2009. p. 178, Update 02. Origionally published October 2007.

7. **Western Australian Planning Commission.** *Development Control Policy 1.4 | Functional Road Classification for Planning.* Western Australian Planning Commission. Perth : s.n., 1998. p. 7, Development Control Policy.

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9. **ARRB.** *Unsealed Roads Best Practice Guide 2.* Port Melbourne : AARB Group Ltd, 2020. p. 358.

10. **Austroads.** *Guide to Road Design Part 4A: Unsignalised and Signalised Intersections.* 3.2 May 2023. Sydney : Austroads Ltd, 2023. p. 203. Vol. 4A. ISBN 978-1-925451-73-3.

11. —. *Guide to Road Design Part 3: Geometric Design.* 3.4. Sydney : Austroads Ltd, 2021. p. 390. Vol. 3, This Guide provides road designers and other practitioners with information about the geometric design of road alignments.. 978-1-922382-15-3.

APPENDIX A Proposed Development Plans

APPENDIX B Response to provided Shire and Community Concerns

As indicated in **Section 11**, the Shire of Jerramungup refused the Development Application lodged in February 2026. A copy of the refusal letter is provided below and on the following page.

SHIRE OF JERRAMUNGUP

8 VASEY STREET, JERRAMUNGUP WA

PO BOX 92, JERRAMUNGUP WA, 6337
PH: (08) 9835 1022

File No.: A80347/OPA264204
Application: P26-006

25 March 2026

BRODIE LEE BAUM
PO BOX 97
BREMER BAY WA 6338

Dear Sir/Madam

APPLICATION FOR RECEPTION CENTRE' 10 TOURIST ACCOMMODATION (ECO TENTS), SIGNAGE AND ASSOCIATED WORKS.

I refer to your application for a Reception Centre & 10 Tourist Accommodation (Eco Tents) lodged with this office on 2 February 2026. Council considered your application at their meeting of 25 March 2026 and resolved (OCM260307) as follows:

That Council refuse Development Application P26-003 for a Reception Centre, Tourist Accommodation. Signage and associated works on Lot 112 (43) Horse Hill Road, Bremer Bay for the following reasons:

1. The proposal is not consistent with the provisions of the Shire of Jerramungup Local Planning Scheme No. 2, specifically the objectives of the 'Rural 'zone:

   – To ensure the continuation of broad-hectare farming as the principal land use in the district and encouraging where appropriate the retention and expansion of agricultural activities where the land is capable of such development.

   – To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment.

   – To allow for facilities for tourists and travellers, and for recreation uses.

   – To help protect rural land from land degradation and further loss of biodiversity by:

     - minimising clearing of remnant vegetation
     - encouraging retention and protection of remnant vegetation
     - encouraging development and protection of vegetation corridors

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- encouraging development of sustainable surface and sub-surface drainage works
- encouraging rehabilitation of salt-affected land
- encouraging soil conservation through land management measures
- encouraging identification and protection of wetlands

– To promote the sustainable management of natural resources, and the prevention of land degradation.

2. The scale of the development will have a negative impact on the amenity of adjoining properties.
3. The Tourist Accommodation (eco tents) are all located at the extremity of the site and the ability to evacuate these if a fire is approaching would be difficult. Eco tents are inherently vulnerable in bushfire conditions.
4. The provided Site Classification Report provided as part of the application is not related to the application as it only deals with an ancillary unit and a 2-bedroom dwelling not the proposed development and as such it had not demonstrated that the site can accommodate the proposed development.
5. The provided 'Wastewater Report' is not a report or detailed study based on the Applicant's proposal. It is simply a quotation and proposed product details and does not demonstrated that the site can accommodate the development.
6. The Local Planning Strategy for Area 17 (Point Henry Peninsula) requires all proposals for development on Rural-zoned lots to be assessed against the Point Henry Limited Rural Strategy 1991, and to comprehensively address issues including environmental assessment, land capability, visual impact, effluent disposal capability, water management and drainage, and servicing and this has not been demonstrated.

If you wish to discuss this further or have any other enquiries please do not hesitate to contact me on the numbers below.

Yours sincerely



Richard Hindley
MANAGER OF DEVELOPMENT
Shire of Jerramungup

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Email: planning@jerramungup.wa.gov.au

A Schedule of Submissions from community members and stakeholders, summarising submissions from 20 submitters across 133 pages, has been provided to support responses to traffic and transport impact issues.

The Shire's Refusal Letter (5) and Schedule of Submissions have been reviewed in the context of this Transport Impact Statement, its reference documents (page 23) and Proposed Development Plans (**Appendix A**). Relevant Traffic and Transport Impact concerns/ comments and responses to these are listed and provided on the following pages.

B1 Shire of Jerramungup Refusal Letter Traffic and Transport Assessment and Response

The Shire of Jerramungup refused the previous development application for six reasons. The reasons are primarily planning, environmental, bushfire, servicing and land capability matters, rather than specific traffic engineering and transport planning grounds. This Transport Impact Statement has been prepared to provide relevant information to assist in assessing whether the proposal would create unacceptable traffic, parking, access, servicing, pedestrian or road safety impacts.

B1.1 Inconsistency with Rural zone objectives

The refusal letter states that the proposal is inconsistent with the Rural zone objectives, including the continuation of broad-hectare farming, consideration of non-rural uses, facilities for tourists and travellers, protection of rural land and biodiversity, and sustainable management of natural resources.

From a transport perspective, the proposal is consistent with a low-intensity rural tourism use rather than an urban-scale commercial development. The TIS identifies that the development would accommodate up to 120 wedding guests and 20 eco-tent guests, with wedding activity generally limited to one event per week during the wedding seasons. The forecast traffic generation is moderate in WAPC terms, with a maximum of approximately 53 car movements and 2 bus movements during the busiest arrival hour, and approximately 47 car movements and 2 bus movements during the departure peak.

The proposed transport arrangements are contained within the site, with on-site parking, bus parking, delivery/ service bays and internal manoeuvring. The development does not rely on on-street parking or urban-style road infrastructure. On this basis, the transport characteristics of the proposal are compatible with a rural tourism setting, subject to appropriate site management and any road safety measures considered necessary by the road authorities.

B1.2 Negative impact on amenity of adjoining properties

The refusal letter raises concern that the scale of the development will have a negative impact on adjoining properties. In traffic terms, potential amenity impacts would primarily relate to traffic volumes, vehicle noise, headlight glare, parking overspill, dust on unsealed roads, event arrivals/ departures and servicing activity.

The TIS demonstrates that parking is proposed to be managed entirely on-site, with 63 marked parking spaces, including guest, accommodation, accessible, service and bus parking. This materially exceeds the minimum calculated parking requirement and reduces the likelihood of parking overspill onto Horse Hill Rd, Point Henry Rd or Magpie Rise. The proposal also includes internal access and manoeuvring, a dedicated bus bay and service bays, allowing passenger set-down/ pick-up and deliveries to occur within the site.

The traffic generation is event-based and intermittent rather than continuous. The busiest traffic periods would occur before and after wedding events, with the highest forecast hour being approximately 53 car movements and 2 bus movements. This is a moderate but short-duration event peak, rather than a sustained daily commercial traffic load. The proposal would also operate primarily on weekends, with wedding events limited to one per week during the wedding seasons. To further address amenity concerns, the Shire could condition an **Operational Traffic and Parking Management Plan** requiring:

- all guest, staff, supplier and bus parking to occur on-site;
- no event parking on Horse Hill Rd, Point Henry Rd or Magpie Rise;
- guest arrival and departure instructions to be issued before each event;
- bus/ charter transport to be encouraged for larger weddings;
- any overflow parking to remain within the site;
- service deliveries and waste collection to occur during daytime hours where practicable; and
- dust management for internal unsealed access roads during event periods.

Subject to these measures, the traffic and parking component of amenity impact is capable of being managed.

B1.3 Eco-tents at extremity of site and bushfire evacuation difficulty

The refusal letter states that the eco-tents are located at the extremity of the site, making evacuation difficult if a fire is approaching, and that eco-tents are inherently vulnerable in bushfire conditions.

This is primarily a bushfire planning and emergency management issue. However, the transport response is relevant because evacuation relies on available access routes, internal circulation and emergency vehicle access.

The site plan and TIS identify two access points: Access A via Horse Hill Rd and Access B via the extended public road (Magpie Rise). The internal access network links the accommodation, reception marquee, parking areas and existing buildings, with a passing area identified on the southern internal access route. The TIS also identifies 6 m internal access/ manoeuvring and service vehicle access to the development areas.

From a transport perspective, the presence of two access points is beneficial compared with a single-access rural site.

The TIS identifies this in **Section 12** and recommends that the **Bushfire Management Plan** and **Bushfire Emergency Plan** confirm that the proposed internal access routes, passing opportunities, gates, road widths, turnarounds and emergency access arrangements are consistent with the bushfire consultant's recommendations.

B1.4 Site Classification Report not related to the proposed development

The refusal letter states that the provided Site Classification Report only deals with an ancillary unit and a two-bedroom dwelling, not the proposed development, and therefore does not demonstrate that the site can accommodate the proposal.

This issue is not a traffic or transport matter.

B1.5 Wastewater Report inadequate

The refusal letter states that the wastewater report is not a detailed study based on the applicant's proposal and does not demonstrate that the site can accommodate the development.

This is not a transport matter.

B1.6 Local Planning Strategy/ Point Henry Limited Rural Strategy requirements not demonstrated

The refusal letter states that Rural-zoned lots in Area 17 are to be assessed against the Point Henry Limited Rural Strategy 1991, including environmental assessment, land capability, visual impact, effluent disposal capability, water management and drainage, and servicing.

Transport is relevant to this reason under "servicing" and broader development suitability. The TIS addresses vehicle access, parking, service vehicles, hours of operation, traffic generation, frontage road conditions, public transport access, pedestrian access, cycle access and safety issues. It therefore provides useful supporting information for the servicing and access component of the broader planning response.

B1 Overall traffic and transport assessment

The available traffic and transport information does not identify a fundamental traffic engineering reason to refuse the proposal. The development is forecast to generate a moderate, event-based traffic impact, with traffic concentrated around wedding arrival and departure periods rather than spread continuously throughout the day. Parking and loading are proposed to be accommodated on-site, with 63 parking spaces, a bus bay, accessible bays, service bays and internal manoeuvring.

The main transport matters requiring further refinement are not capacity-related but relate to management and safety. These include confirming the legal and physical availability of both site accesses, finalising the road safety recommendation for the Point Henry Rd bend and including operational controls to prevent overflow parking, unmanaged roadside set-down/pick-up, or avoidable service vehicle impacts on neighbouring rural-residential properties.

B2 Schedule of Submissions Traffic and Transport Assessment and Response

Assessment comments on Schedule of Submissions – traffic and transport issues only

The Schedule of Submissions for the February 2026 Development Application raises a number of traffic and transport-related matters. These include concerns regarding traffic generation, the suitability of Horse Hill Rd and Magpie Rise, parking supply, bus and service vehicle access, emergency access and evacuation, pedestrian and cyclist safety, dust from unsealed roads, vehicle noise and the absence of a traffic impact assessment at the time of determination.

The Transport Impact Statement now provides a technical response to these matters. On review, the submissions do not identify a fundamental road capacity or traffic engineering constraint that would prevent the development from proceeding. However, they do identify legitimate matters that should be addressed through clear documentation, operational controls and, where appropriate, conditions of approval.

B2.1 Absence of a Traffic Impact Assessment

Several submissions state that no traffic impact assessment was provided with the original application, and the Shire's officer comments upheld this concern on the basis that there was insufficient traffic information to determine the application.

This issue has now been addressed by the preparation of the Transport Impact Statement (TIS). The TIS has been prepared in accordance with the WAPC Transport Impact Assessment Guidelines and identifies the proposal as requiring a Transport Impact Statement rather than a full Transport Impact Assessment. This is appropriate because the development is forecast to generate up to approximately 55 vehicle movements in the busiest peak hour, which falls within the WAPC "Moderate Impact" category.

The earlier criticism that insufficient traffic information was available was reasonable at the time of the February 2026 assessment. However, the TIS now provides the relevant information required to assess the transport impacts of the proposal.

B2.2 Traffic generation and road network impact

Objectors raised concern that the development would generate substantial traffic on Horse Hill Rd and the surrounding rural road network, including guest vehicles, buses, deliveries, staff, maintenance vehicles and accommodation-related trips.

The TIS estimates a maximum peak hour of approximately 53 car movements plus 2 bus movements during the wedding arrival peak, and approximately 47 car movements plus 2 bus movements during the departure peak. This is a moderate, event-based peak rather than a continuous daily commercial traffic load. The traffic would be concentrated around arrival and departure periods for weddings, with the proposal otherwise operating as low-frequency short-stay accommodation and occasional wellness events.

The submissions also include some higher traffic estimates based on caravan sites, 16 eco-tents, 12 caravan bays or total site occupancy of up to 240 people. These estimates are not directly applicable to the current proposal if the assessed development is limited to the reception centre and 10 eco-tents. Any future caravan bays, additional tents, chalets or expanded tourist park use would need to be treated as a separate development application and would require separate traffic assessment.

On the basis of the current proposal, the forecast traffic volumes are within the functional capacity of the surrounding rural road network, as described in **Section 11**. The issue is therefore not road capacity, but rather management of event arrivals/ departures, dust, amenity, road safety and ensuring that all parking and loading occurs on-site.

B2.3 Horse Hill Rd access

Several submissions state that Horse Hill Rd is a narrow, unsealed rural road and is unsuitable for the proposed level of traffic.

As indicated in **Section 11**, Horse Hill Rd is an unsealed two-way local rural road with no marked centreline and a formation width of approximately 8.2 m to 9.7 m near the site. This width is generally capable of accommodating low-volume two-way rural traffic, including intermittent event traffic.

The use of Horse Hill Rd as the primary access route is appropriate in principle, particularly given that the TIS proposes on-site parking and loading, rather than reliance on roadside parking. The TIS has identified the Horse Hill Rd / Access A as the primary visitor access. If the Shire requires or approves an alternative arrangement, a revision to the TIS will be required to document and assess this. Event information should direct guests to use the approved access route only.

Given the unsealed surface, a dust management measure would be appropriate. This could include maintaining internal access tracks, managing vehicle speeds, using traffic marshals or event staff during larger events, and applying dust suppression if required during dry or windy conditions. This should be included in the recommended **Operational Traffic and Parking Management Plan**, as stated in the **Executive summary** on page 3.

B2.4 Magpie Rise and northern access

A recurring concern in the submissions is the proposed connection to Magpie Rise and the possibility of event or tourist traffic using Magpie Rise to access Short Beach or as a short-cut through rural-residential land. Concerns include impacts on amenity, dust, noise, pedestrian safety and the function of Magpie Rise as a quiet local cul-de-sac.

The TIS identifies a secondary access from the extended public road/ Magpie Rise along the northern boundary. From a transport and emergency access perspective, a secondary access is beneficial, particularly in a bushfire-prone rural/ coastal setting. However, the submissions demonstrate that the purpose and management of this access must be clarified.

If Magpie Rise is intended only for emergency access, management access or restricted secondary access, that should be clearly stated on the plans and in the recommended **Operational Traffic and Parking Management Plan**. If it is intended for routine guest access, then the TIS requires amendment to assess the likely number of vehicles using Magpie Rise and address the amenity and safety concerns raised by surrounding residents.

The preferred transport response is to nominate Horse Hill Rd/ Access A as the primary guest access and restrict Magpie Rise/ Access B to emergency, management or controlled operational use unless otherwise required by the Shire or the **Bushfire Management Plan**.

B2.5 Parking adequacy

Several submissions refer to 40 bays, 12 wedding bays, or an apparent mismatch between the report and the masterplan. The submissions also raise concern that guests may park informally on internal tracks, perimeter access roads, roadsides or vegetated areas.

The revised TIS identifies 63 on-site parking spaces, comprising 2 Dwelling bays, 2 workers' accommodation bays, 1 ancillary accommodation bay, 18 accommodation bays, 1 accommodation ACROD bay, 30 wedding guest bays, 4 wedding ACROD bays, 4 delivery/ service/ loading bays and 1 bus bay. This is a stronger and clearer position than the material described in the submissions.

On this basis, the parking concern is capable of being addressed, provided the plans and report are consistent and the parking areas are clearly shown. The proponent should ensure that the 63 (previously 58) parking spaces are reflected consistently in the masterplan, parking schedule and operational description.

A suitable condition or management measure should require:

- all guest, staff, accommodation, supplier and bus parking to occur on-site;
- no event parking on Horse Hill Rd, Point Henry Rd or Magpie Rise;
- no parking on internal access roads required for emergency access;
- overflow parking, if ever required, to be contained within a designated on-site area; and
- event staff or marshals to direct vehicles during larger weddings.

All the above is included in the recommended **Operational Traffic and Parking Management Plan**.

Subject to these measures, the proposed parking supply of 63 parking bays (increased from previous 58 parking bays) is adequate for the current 120-guest proposal.

B2.6 Set-down and pick-up, taxis and buses

Some submissions raise concern about buses, guest arrivals, late-night departures and vehicles associated with weddings.

The TIS identifies a dedicated bus bay and internal manoeuvring, which supports on-site passenger loading and unloading. It also notes that there is no separate formal taxi rank or dedicated set-down and pick-up bay, but that set-down and pick-up can occur within the site through the internal access and parking layout.

This is acceptable for a rural event venue, provided all set-down and pick-up activity occurs on-site and not on Horse Hill Rd or Magpie Rise. For larger weddings, use of the dedicated bus bay and charter/ group transport should be encouraged, as this would reduce the number of individual car trips and assist with safe late-night departures.

B2.7 Service vehicles, deliveries and water carting

Submissions raise concern that service vehicles, deliveries, water trucks, waste vehicles and food suppliers may generate additional traffic and dust.

The TIS identifies 5 delivery/ service bays and confirms that service vehicles can access the site via the internal rural driveway network and load/ unload within the site. This addresses the key traffic issue, namely that service vehicles should not be required to stop or unload on the frontage roads.

The recommended **Operational Traffic and Parking Management Plan** requires that waste collection and servicing occurs during daytime hours.

B2.8 Dust and vehicle-related amenity impacts

Several submissions identify dust from unsealed roads and internal access tracks, particularly from buses, delivery vehicles and guest cars. This is a legitimate amenity issue in a rural coastal location with unsealed roads and strong winds.

The TIS notes that driveways are proposed to remain unsealed to retain rural character. That is reasonable however, it is also reasonable to require that management measures are included, such as maintaining the access surface, applying dust suppression where required, limiting vehicle speeds on internal roads, and avoiding unnecessary use of perimeter access roads close to adjoining dwellings.

The issue is not expected to warrant refusal on traffic grounds, but it should be addressed through the **Operational Traffic and Parking Management Plan** and/ or a condition of approval.

B2.9 Vehicle noise, headlights and late-night departures

Submissions refer to vehicle noise, buses, guest departures after events, headlights and late-night activity. These are primarily amenity issues, but they are partly traffic-related.

The TIS identifies wedding events operating Friday to Sunday from 12 noon to midnight, with older guests and families expected to depart from around 9:00 pm. Vehicle movements associated with departures would therefore occur during evening and late-night periods.

The transport response should focus on managing how departures occur. Measures could include:

- directing all departing vehicles to use the approved route;
- maintaining low internal speed limits;
- avoiding use of the northern boundary/ perimeter access road for routine guest departures if it is close to neighbouring dwellings;
- using low-level, directional wayfinding lighting where required;
- discouraging unnecessary idling;
- encouraging charter buses or organised transfers for larger weddings; and
- ensuring taxis and private pick-ups occur within the site.

These measures would reduce transport-related amenity impacts. These measures can be included in the recommended **Operational Traffic and Parking Management Plan.**

B2.10 Pedestrian and cyclist safety

Submissions raise concern about pedestrians and families using Magpie Rise and Short Beach access, as well as guests potentially wandering onto neighbouring properties.

The TIS identifies that there are no constructed footpaths, shared paths or dedicated cycle lanes on Horse Hill Rd, Point Henry Rd or Magpie Rise. It also identifies that pedestrian and cyclist activity would occur informally on roads or verges, and that proposed pedestrian movement within the development should be managed internally between parking, set-down areas and venue facilities.

Given the site's rural location, pedestrian and cycling access to and from the site is expected to be negligible. The more relevant issue is internal pedestrian management and avoiding pedestrian spillover onto neighbouring firebreaks or private land. The site plan and operational management plan should ensure that internal paths are legible, guests are directed between parking and venue areas, and any paths near boundaries are either removed, redirected internally, or clearly signed as not providing public access to neighbouring land.

No off-site footpath or cycleway upgrades are considered warranted as part of this proposal, given the low expected walking/ cycling demand and the regional/ rural context.

B2.11 Emergency access and evacuation

Several submissions raise bushfire evacuation and emergency access concerns, including the vulnerability of Point Henry, the limited road network, potential use of Magpie Rise, unlocked gates, firebreaks and the difficulty of evacuating visitors unfamiliar with the area.

The site plan and TIS identify two access points: Access A via Horse Hill Rd and Access B via the extended public road (Magpie Rise). The internal access network links the accommodation, reception marquee, parking areas and existing buildings, with a passing area identified on the southern internal access route. The TIS also identifies 6 m internal access/ manoeuvring and service vehicle access to the development areas.

From a transport perspective, the presence of two access points is beneficial compared with a single-access rural site.

The TIS identifies this in **Section 12** and recommends that the **Bushfire Management Plan** and **Bushfire Emergency Plan** confirm that the proposed internal access routes, passing opportunities, gates, road widths, turnarounds and emergency access arrangements are consistent with the bushfire consultant's recommendations.

B2.12 Road safety at Point Henry Rd / Horse Hill Rd

The submissions focus heavily on local access roads, but the TIS identifies a specific road safety matter at the Point Henry Rd bend north of Horse Hill Rd. The TIS notes that sight distance to the north from Horse Hill Rd is restricted by the bend and verge embankment, and recommends that the Shire and Main Roads WA assess the safe operating speed and consider a reduced speed limit or curve warning/advisory speed signage.

This is an important finding. It is not caused by the proposed development, but the development will increase the number of turning movements at Horse Hill Rd. The Executive Summary includes this recommendation.

From a road network safety perspective, the conclusion remains that no development-specific road capacity upgrades are warranted, but the existing road safety concern at Point Henry Rd requires assessment by the relevant road authorities, i.e., Shire of Jerramungup (responsible for the roads and intersection) and Main Roads WA (responsible for speed limit signing).

B2.13 Future development, caravans and cumulative traffic

A number of submissions refer to future caravan bays, additional tents, future chalets, central facilities or broader tourist park use. These concerns materially affect traffic assumptions if they form part of the assessed proposal.

The TIS makes it clear that the assessment is limited to the current proposal: reception centre, 10 eco-tents, associated parking, service access and supporting facilities. Any future expansion would require a separate application and a separate traffic assessment. This clarification is important because some objector traffic estimates are based on development components that are not part of the current proposal.

B2 Overall transport assessment

The Schedule of Submissions raised valid transport information gaps at the time of the original February 2026 application, particularly the absence of a traffic impact assessment, uncertainty regarding access management, inconsistency in parking numbers, and concerns regarding Magpie Rise, dust, service vehicles and emergency access.

The TIS addresses most of these matters and provides a reasonable basis to conclude that the current proposal would have a moderate, event-based traffic impact that can be accommodated by the surrounding rural road network, subject to appropriate management. The proposal provides on-site parking, service bays, bus parking, internal manoeuvring and a defined access network.

APPENDIX C WAPC Transport Impact Statement Checklist

Checklist for a transport impact statement for individual development

- Mark ☒ for items for which information is provided.
- Leave ☐ if the item is not appropriate and enter reason in comment column.
- Provide brief comments on any relevant issues.
- Provide brief description of any proposed transport improvements, for example, new bus routes or signalisation of an existing intersection.

ITEM	PROVIDED	COMMENTS
Proposed development	☒	Section 2
regional context	☒	Figure 3
existing land uses	☒	Figure 2
proposed land use	☒	Figure 2
context with surrounds	☒	Appendix A (Regional & District Plan)
Vehicular access and parking	☒	Section 3.
access arrangements	☒	Figure 2.
public, private, disabled parking set down/pick up	☒	Figure 2 and Table 2.
Service vehicles (non-residential)	☒	Section 4
access arrangements	☒	Figure 2 and Table 2.
on/off-site loading facilities	☒	Figure 2 and Table 2.
Service vehicles (residential)	☐	
rubbish collection and emergency vehicle access	☐	
Hours of operation (non-residential only)	☒	Section 5.
Hours of operation	☒	Table 4.
Traffic volumes	☒	Section 6.
daily or peak traffic volumes	☒	Table 5.
Type of vehicles (for example, cars, trucks)	☒	Table 5
Traffic management on frontage streets	☒	Section 7.
Frontage streets details	☒	Table 7.
Public transport access	☒	Section 8.
nearest bus/train routes	☒	Section 8.
nearest bus stops/train stations	☒	Section 8.
pedestrian/cycle links to bus stops/ train station	☒	Section 8.
Pedestrian access/ facilities	☒	Section 9.
existing pedestrian facilities within the development (if any)	☒	Section 9.
proposed pedestrian facilities within development	☒	Section 9.
existing pedestrian facilities on surrounding roads	☒	Section 9.
proposals to improve pedestrian access	☐	NA

ITEM	PROVIDED	COMMENTS
Cycle access/ facilities	☒	Section 10.
existing cycle facilities within the development (if any)	☒	Section 10.
proposed cycle facilities within development	☒	Section 10.
existing cycle facilities on surrounding roads	☒	Section 10.
proposals to improve cycle access	☐	NA.
Site specific issues	☒	Section 11.
Describe any site specific issues	☒	Section 11 and Appendix B.
Safety issues	☒	Section 12.
identify issues	☒	Section 12.
remedial measures	☒	Recommended that:
12.1	The Bushfire Management Plan and Bushfire Emergency Plan confirm that the proposed internal access routes, passing opportunities, gates, road widths, turnarounds and emergency access arrangements are consistent with the bushfire consultant's recommendations.	
12.2	An Operational Traffic and Parking Management Plan is developed and used.	
12.3	The Shire and Main Roads WA assess the safe operating speed of Point Henry Rd on the bend north of Horse Hill Rd intersection and consider a reduced speed limit or curve warning/ advisory speed signage, regardless of the proposed development as this is an existing safety issue.	

Proponent's name:

Company: Planning Outcomes WA **Date:**

Transport assessor's name: David Wilkins

Company: i3 consultants Pty Ltd **Date:** 8/07/2026

Appendix C

Bushfire Report

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Bushfire Management Plan Coversheet

Site address:	43 horse Hill Rd, Bremer Bay						
Site visit / date:	Yes	✓	No		14 December 2024		
Report author or reviewer:	Mike Scott						
Not accredited		Level 1 BAL assessor		Level 2 practitioner		Level 3 practitioner	
BPAD accreditation number:	27795	Accreditation expiry – month / year		February	2026		
Bushfire Management Plan - version / date:	V1.1	17 July 2026					

If one or more of the following responses are yes, then these should be automatically referred to DFES.	**Yes**	**No**
Strategic planning is required to address SPP 3.7 and the Guidelines		✓
The application is a vulnerable land use	✓	

If one or more of the following responses are yes, and the decision-maker requires input from DFES, then the application can be referred.	**Yes**	**No**
The BAL rating has been calculated by a method other than Method 1 as prescribed by AS 3959	✓	
An outcomes-based approach has been submitted to demonstrate compliance with the bushfire protection criteria	✓	

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

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

Dated signature of report author or reviewer:		17 July 2026

BUSHFIRE PRONE PLANNING

Bushfire Management Plan

(PREPARED FOR PLANNING APPLICATION ASSESSMENT PURPOSES)



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

Lot 112, 43 Horse Hill Road Bremer Bay

Shire of Jerramungup

Development Application - Vulnerable Land Uses

17 July 2026

Job Reference No: **251211**

BPP GROUP PTY LTD T/A BUSHFIRE PRONE PLANNING

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Reviewed:	Mike Scott (BPAD Level 3 No. 27795)	

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Version	Status/Details	Date
1.1	Updated report to reflect new site plan	17 July 2026
1.0	Original	5 February 2026

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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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STATEMENT OF PURPOSE – THE 'PLANNING' BUSHFIRE MANAGEMENT PLAN

EXPLANATORY INFORMATION

SITE/USE PLANNING

This BMP is produced to present the information necessary for a planning proposal's assessment against the State's bushfire planning requirements. The developed information is to inform and assist decision-making authorities, planners, landowners/proponents and referral agencies in their implementation WA's State Planning Policy 3.7 Bushfire – and where relevant, any supplementary provisions of a local planning scheme or policy.

Policy Document Versions Applied in This BMP	State Planning Policy 3.7 Bushfire (SPP 3.7)	November 2024	Planning for Bushfire Guidelines (supporting SPP 3.7)	November 2024

> The Stated Intent of SPP 3.7 is to *implement effective, risk based land use planning and development which in the first instance avoids bushfire risk, but where unavoidable, manages and/or mitigates the risk to people, property and infrastructure to an acceptable level. The preservation of life and the management of bushfire impact are paramount.*

SITE OPERATIONS

This BMP is not an 'operational' BMP for property and operations management. Such a BMP would apply additional and more specific bushfire protection measures to more comprehensively reduce the level of risks associated with a bushfire event. These being the potential loss of life, injury, or destroyed or damaged assets which results in personal loss and economic loss.

However, this 'planning' BMP does establish certain responsibilities for the implementation and maintenance of the bushfire protection measures that are considered the minimum for bushfire planning decision making.

BUSHFIRE RESISTENT CONSTRUCTION

This 'planning' BMP is not required to consider the requirement to construct certain buildings, in designated bushfire prone areas, to the standard corresponding to the Bushfire Attack Level (BAL) they are subject to. This requirement is dealt with under the State Building Act 2011/Building Regulations 2012 and the referenced Building Code of Australia.

DETERMINED BUSHFIRE ATTACK LEVEL (BAL) RATINGS AND CONSTRUCTION – CAUTION!

For construction purposes a determined (not indicative) BAL rating is required to be known and a BAL Certificate produced for submission with a building application. This establishes the construction design and materials that are to be complied with in accordance with AS 3959 Construction in bushfire prone areas (as amended) and/or NS 300 NASH Standard Steel Framed Construction in Bushfire Areas (as amended).

This 'planning' BMP cannot necessarily determine a BAL rating that will apply to a future building. All variables required for that calculation may not be known at the assessed stage of planning. For example, actual location of a building footprint on a lot and/or any classified vegetation that will remain, at the time of construction, within the lot or on neighbouring lots.

This 'planning' BMP is only required to identify if a viable sized building can be located on a lot and be subject to a BAL rating not exceeding BAL-29, based on certain allowable assumptions. This is a planning requirement not a building requirement and a BAL contour map can be used to illustrate this information as an 'indicative' BAL rating.

Be aware that typically you cannot derive the determined BAL rating for a future building(s) on a specific lot from a BAL contour map (when presented in a BMP prepared for planning approval purposes). This is only possible in limited circumstances.

Planning assessment requirements are different to building assessment requirements. Refer to explanatory information above and Appendix B1 and B2 for additional information.

EXECUTIVE SUMMARY

This Bushfire Management Plan (BMP) has been prepared to support a development proposal for a wedding venue with associated short-stay overnight accommodation, which is classified as a vulnerable land use under the bushfire planning framework. As part of the broader development, workers' accommodation and an ancillary dwelling are also proposed on the site; however, these buildings are the subject of a separate development application and are not assessed within this BMP, having already received conditional approval.

The proposal addressed by this BMP includes the following key components:

- A non-habitable toilet block;
- Glamping tents, classified as tolerable loss elements;
- The existing house to be used as an administration and check-in building;
- Tourism day-use areas, including the ceremony area; and
- An on-site bushfire shelter intended to accommodate event patrons and staff.

Given the nature of the use and the presence of visitors who may be unfamiliar with the site, the development is required to demonstrate a high level of bushfire protection and safe evacuation or shelter-in-place capability.

Technically, the proposal is non-compliant with the Acceptable Solutions for access under the relevant bushfire planning guidelines, as access is provided via a no-through road exceeding 200 metres in length, with only one suitable evacuation destination, and the on-site shelter is designed to accommodate more than 100 people.

An outcomes-based approach has therefore been undertaken to demonstrate that, despite the access constraints, the proposal meets the intent of the bushfire planning framework. This assessment considers the site context, fire behaviour potential, likely occupant characteristics, emergency management procedures, and the feasibility of evacuation versus shelter-in-place strategies during a bushfire event.

To mitigate bushfire risk and achieve an acceptable level of safety, a suite of additional bushfire protection measures is proposed, including but not limited to:

- Improved accessways;
- An on-site bushfire shelter designed to accommodate patrons and staff in the event of an emergency;
- Clear emergency management and evacuation procedures, including event-specific management protocols; and
- Designated closure days on high Fire Behaviour Index (FBI) days.

With the implementation of the recommended mitigation measures and ongoing site management, the development is considered capable of achieving an acceptable level of bushfire safety consistent with the objectives of the *Guidelines for Planning in Bushfire Prone Areas*, despite departures from certain Acceptable Solutions. Accordingly, the proposal is recommended to be supported by BPP from a bushfire risk management perspective, subject to the conditions and recommendations outlined in this BMP.

1 THE PLANNING PROPOSAL

1.1 Details, Plans and Maps

SUBJECT LAND AND PROPONENT (LANDOWNER)		
Address Details	43 Horse Hill Rd, Bremer Bay	
Applicable Local Government	Shire of Jerramungup	
Proponent	Isaac and Brodie Baum	
Entity Commissioning Production of the BMP	Matt Stuart	
THE PLANNING PROPOSAL STAGE AND TYPE		
Strategic Planning Document	☐	N/A
Structure Plan	☐	N/A
Subdivision Application	☐	N/A
Development Application	☑	Construction and/or use of a caravan park, nature-based park or camping ground that is subject to bushfire planning requirements.
DESCRIPTION		
The proposed development comprises a wedding venue with associated short-stay overnight accommodation, located within a bushfire prone area and therefore classified as a vulnerable land use under the bushfire planning framework. The development includes the following components: • Tourism day-use areas, comprising ceremony and reception spaces used for weddings and events; • Glamping tents to provide short-stay overnight accommodation for event guests, which are classified as tolerable loss elements; • The existing house to be used as an administration and check-in building; • A non-habitable toilet block to service patrons and guests; and • An on-site bushfire shelter intended to provide shelter-in-place capability for patrons and staff during a bushfire emergency.		

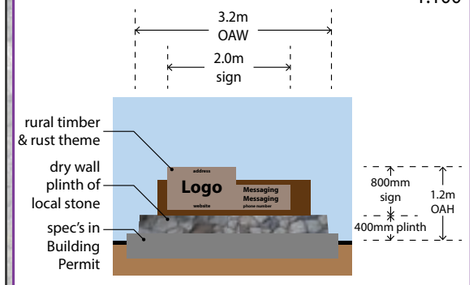
Primary Proposed or Intended Construction		
EXPLANATORY INFORMATION Note: A habitable building is defined in the WA *Planning and Development (LPS) Regulations 2015* to mean: A permanent or temporary structure on land that: (a) Is fully or partially enclosed; and (b) Has at least one wall of solid material and a roof of solid material; and (c) Is used for a purpose that involves the use of the interior of the structure by people for living, working, studying or being entertained.		
Primary Type(s)	Eco-tent	Change of use(s) to existing building(s)
BCA Classification	N/A	Class 5 (office building - professionals)
		Class 10a (non-habitable - inc. shed, carport, deck)

Vulnerable Land Use Determination	
Applying the definition established in SPP 3.7:	
• A land use which is designed to accommodate people who are less physically or mentally able and likely to present evacuation challenges; and/or	☐
• A land use which due to the building design or use, or the number of people accommodated, likely to present evacuation challenges; and/or	☑
• A land use which involves visitors who are unfamiliar with the surroundings.	☑
In applying the Guidelines, Appendix B5 and DPLH officer level advice, consideration is also given to:	
• The location and to the number of employees and visitors on-site at any one time; and	☑
• If the decision-maker considers that the preparation of a bushfire emergency plan is warranted, then the use should be considered vulnerable.	☑
Assessment Supporting Details: The proposed buildings will accommodate employees and visitors on-site, likely to present evacuation challenges. As the site is assessed as a vulnerable tourism land use, a Bushfire Emergency Plan (BEP) is also required. The BEP will be produced at a later date.	

Development Type - Establishing the Applicable Bushfire Protection Criteria			
Vulnerable Tourism Land Use and Day Uses	For the construction, and/or use of, or additions to a habitable building for a vulnerable tourism land use. *[Guidelines s8]*	Tourist and visitor accommodation.	☑
		Day Uses (no overnight stay)	☑
		Outdoor Events (may include overnight camping).	☑
		Caravan Park, nature based park and/or camping ground, with or without a habitable building(s).	☑
Assessment Supporting Details: None required.			

ENTRY STATEMENTS

1:100



Entry Statement – Elevation

- Agg. 1.2m² signage
- Non-illuminated
- Locally sourced
- Not in verge

LEGEND

- Existing building or use
- Proposed building or use
- SB50 — Setback to Boundary (e.g. 50m)
- Gate, min. 3600W, unlocked (Not to Scale)
- Entry statement (NtS)
- Driveway, 2WD, 4000W / 6000W (limestone / gravel / sealed)
- Parking bay, 2600W / 4800W x 5500L x 58 (AS2890.1 B99 / AS1428.1 DA bays)
- Bus bay, 3500W x 12500L x 1
- Pedestrian path, 1200W / 1800W
- Water tank (NtS)
- Pergola, 3.6m x 3.6m

Lot 108
Lot 112
Lot 113
Lot 2
Lot 3
Lot 7
Dwelling
Shed
to Short Beach & emergency destinations
winter sun
Magpie Rise
extensive illegal clearing ~5ha (50%) of lot in 2025 by neighbour objecting to clearing, flora & fauna & dust
extended public road by neighbour without Shire approval
new dusty limestone driveway by neighbour objecting to dust
ridge
UG power
Kwongkan & Peppermints
1212.100m
shed bushfire shelter
single house mgt accom.
outdoor ceremonies
toilets
reception centre portable marquee
workers accom.
5 x eco-tent tourist accom.
SB10
SB20
APZ 2024
Subject Site
No. 43
40 ha.
summer prevailing winds
views
draw
Salt Cove
Horse Hill Rd
to main road & emergency destinations
1045m
OH power
service access
universal access unit
ancillary accom.
passing 6x20@200m
5 x eco-tent tourist accom.
cove
to Banky Beach & Pt Gordon
winter prevailing winds

APPROVAL

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0 20 50 60 100 120 150 200 Metres

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Rev. B - July 2026

Salt Cove Bremer Bay

No. 43 (Lot 112) Horse Hill Rd, Bremer Bay

DA for Weddings & Accommodation – Appx.D3: Master Plan

1:3k(A3)

Figure 1.2

Proposed Development

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

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

- Subject Site
- Cadastral
- Driveways / Accessways
- Indicative Turning Circle
- Indicative Firefighting Water Tank
- Rainwater Tank

Existing Buildings

- House
- Shed

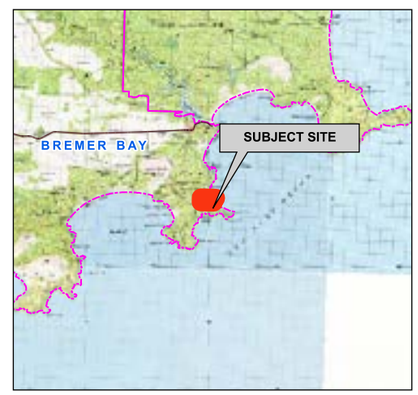
Proposed Buildings

- Worker's Accommodation
- Ancillary Dwelling
- Eco-tent
- Toilet block

0 20 40 60 80 100

Metres

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



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 17-07-2026
SCALE (A3): 1 : 2200

BUSHFIRE PRONE PLANNING

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Figure 1.3

Location Map

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

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

- Subject Site
- Reserves

DBCA Legislated Landsand Waters (DBCA-011)

- National Park

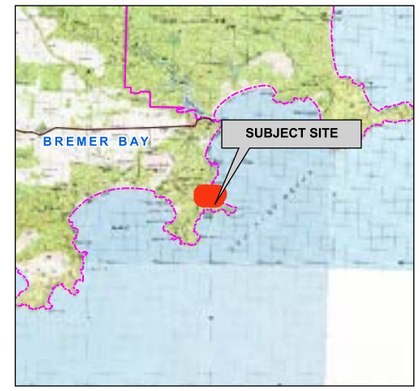
DFES Stations (DFES-023)

- Volunteer Fire & Emergency Service Unit

0 500 1,000 1,500 2,000 2,500

Metres

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



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 12-01-2026
SCALE (A3): 1 : 40000

BUSHFIRE PRONE PLANNING

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1.2 The Planning Proposal and its Requirement to Address Bushfire Risk

EXPLANATORY INFORMATION

For the subject planning proposal, the intent of this section is to:

- Identify the relevant statutory bushfire planning provisions that have established its requirement to address bushfire risk;
- Identify the relevant policy/guideline 'triggers' to apply SPP 3.7 Bushfire;
- Identify when a local government, as the decision maker, has established additional 'triggers' to apply defined bushfire planning assessments; and
- Identify the consideration of any relevant exemptions from application of SPP 3.7 Bushfire.

Relevant Terms

Development means the development or use of any land, including (a) any demolition, erection, construction, alteration of or addition to any building or structure on the land (b) the carrying out on the land of any excavation or other works (Planning and Development Act 2005, Part1, s.4; and

Habitable building means a permanent or temporary structure on land that:

(a) is fully or partially enclosed; and

(b) has at least one wall of solid material and a roof of solid material; and

(c) is used for a purpose that involves the use of the interior of the structure by people for living, working, studying or being entertained;

Specified building means a structure of a kind specified in this Scheme as a kind of structure to which this Part applies in addition to its application to habitable buildings.

Development site means that part of a lot on which a building that is the subject of development stands or is to be constructed - Planning and Development (LPS) Regulations 2015, s.78A.

Construction of a building includes the erection, assembly or placement of a building but does not include the renovation, alteration, extension, improvement or repair of a building;

1.2.1 Applied Statutory Bushfire Provisions Requiring a Planning Application

A PLANNING AND A BUILDING APPLICATION IS TO BE SUBMITTED TO THE LOCAL GOVERNMENT FOR DETERMINATION	
For the proposed development (construction and/or use) the local government is the decision maker. The local government determination will be made under: • The Planning and Development Act 2005, its relevant subsidiary legislation (e.g. Regulations) and associated policies that establish the objectives and high-level guidance; and/or • The local government's local planning scheme and associated policies that establishes objectives and guidance, specific to the jurisdiction, in addressing the requirements established by the above legislation and associated policy.	
A BUILDING OR PLANNING APPLICATION REQUIRES A BAL RATING AND PLANNING APPROVAL The proposed development is for building works subject to the Building Code of Australia and is located in a designated bushfire prone area (Map of Bushfire Prone Areas). One or more of the following applies.: • The local government requires submission of a building permit application under the Building Act 2011 / Building Regulations 2012) including a bushfire attack level (BAL) assessment (and certificate). Applicable when the proposed development is a class of building subject to bushfire construction requirements (i.e. Classes 1, 2, 3 buildings and associated Class 10a, and Class 9 vulnerable use buildings under the Building Code of Australia).	-

• The local government has a responsibility under the Planning and Development (LPS) Regulations 2015 to ensure strategic planning proposals, structure plans and development applications address SPP 3.7 and the Guidelines. • The local government, in accordance with its local planning scheme, is responsible to administer the relevant development controls, with due regard to SPP 3.7 and the Guidelines.	
WHERE PRE-DEVELOPMENT BUSHFIRE ATTACK LEVEL (BAL) OF RELEVANT BUILDINGS IS BAL-40 OR BAL-FZ The Deemed Provisions in Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015, Part 10A – Bushfire risk management, establish: 1. If the proposed development is: (a) The construction or use, or construction and use, of a single house or ancillary dwelling on a lot or lots with a total area of 1,100 m^2 or more; or (b) The construction or use, or construction and use, of (i) a habitable building other than a single house or ancillary dwelling; or (ii) a specified building; and (c) Is not the use of a dwelling as hosted or unhosted short-term rental accommodation (STRA) which is specifically excluded; and 2. The development site is wholly or partly within a designated bushfire prone area (Map of Bushfire Prone Areas), requiring the developer to have prepared a BAL assessment for the development site: then 3. Where the pre-development (before the establishment of an APZ), calculated bushfire attack level of the development site is BAL-40 or BAL-FZ, then the developer must have development approval to commence any development on the development site.	✓
Assessment Supporting Details: None required.	

1.2.2 Applied Triggers to Apply State Planning Policy 3.7 Bushfire

EXPLANATORY INFORMATION

State Planning Policy 3.7 Bushfire (SPP 3.7) provides broad objectives and high-level guidance for how planning proposals and development applications within bushfire prone areas should be considered. Implementation is supported by more detailed instructions within the *Planning for Bushfire Guidelines*.

The following table identifies the guidance that has resulted in the planning proposal being required to apply SPP 3.7.

Inconsistent Information (as of December 2024):

- There are inconsistences between the provisions of the applicable legislation (Planning and Development (LPS) Regulations 2015), the clauses of the associated policy (SPP 3.7 Bushfire) and its associated guidance (Planning for Bushfire Guidelines Nov. 2024).
- This has resulted in inconsistencies in the establishment of the 'triggers' to lodge proposals, plans and applications for planning approval sourced from these documents.

Until legislation/policy/guideline amendments are completed, the advice from WAPC/DPLH is that the decision maker should apply SPP 3.7 and the Guidelines as they deem necessary. *(Source: Explanatory Note SPP 3.7, DPLH, 25/11/24)*

Bushfire Prone Planning's Current Approach:

- To apply the 'triggers' for application of SPP 3.7/Guidelines in accordance with the current version of the Guidelines (Planning for Bushfire Guidelines, November 2024), in Sections 6, 7 and 8 - as this is best aligned with the current version (3 Nov 2024) of the LPS Regulations 2015; unless
- The relevant decision maker has determined, and confirmed in writing to the proponent, that SPP 3.7/Guidelines is to be applied.

SPP 3.7 AND THE GUIDELINES - ESTABLISHING THE NEED TO GIVE DUE REGARD TO SPP 3.7		APPLICABLE
1	THE LAND SUBJECT TO THE PLANNING PROPOSAL IS:	
	Designated bushfire prone and 'Area 1 (Urban)' on the Map of Bushfire Prone Areas (refer to Figure 1.4); or	No
	Designated bushfire prone and 'Area 2' on the Map of Bushfire Prone Areas (refer to Figure 1.4).	Yes
AND		
2	THE PLANNING PROPOSAL WILL:	
	Result in the intensification of development (or land use); or	Yes
	Result in an increase of visitors, residents or employees; or	Yes
	Adversely impact or increase the bushfire risk to the subject or surrounding site(s).	No
AND		
3	THE PLANNING PROPOSAL IS A:	
	(Source: SPP 3.7, Part 4) A development application for construction and/or use of a habitable building (other than a single house or ancillary dwelling), for a vulnerable land use and where the development site(s) has a BAL rating above BAL-LOW.	Currently not triggered by legislation - BUT – the relevant decision-maker has established the requirement to apply SPP 3.7
	(Source: SPP 3.7, Part 4) A development application for construction and/or use of a caravan park, nature-based park or camping ground	Currently not triggered by legislation - BUT – the relevant decision-maker has

	(whether it contains a habitable building(s) or not), and where the development site(s) has a BAL rating above BAL-LOW.	established the requirement to apply SPP 3.7
Assessment Supporting Details: None required.		

1.2.3 Applied Triggers Established by the Local Government as the Decision Maker

EXPLANATORY INFORMATION

The applicable local government is required to give due regard to the following:

The Deemed Provisions in Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015, where:

- Part 2 cl. 3 provides for the local government to prepare a local planning policy; and
- Part 9 cl. 67(q & r) establishes the local government must give due regard to:
  - The suitability of the land for the development taking into account the possible risk of flooding, tidal inundation, subsidence, landslip, bush fire, soil erosion, land degradation or any other risk.
  - The suitability of the land for the development taking into account the possible risk to human health or safety.

Under these general provisions, in addition to the specific statutory bushfire provisions identified in Section 1.2.1, the local government may have bushfire planning policy/information (under the local planning scheme) which is to be addressed in this BMP. This is identified below as relevant.

ESTABLISHING THE NEED TO APPLY LOCAL GOVERNMENT DEFINED BUSHFIRE PLANNING REQUIREMENTS	
Identification of the Relevant Instrument	No indication of applicability from the local government authority.

1.2.4 Identified Exemptions

EXPLANATORY INFORMATION The following situations provide for an exemption from the application of SPP 3.7/Guidelines. They are established by the stated sources and are presented below as: • Evidence they have been considered when relevant; and • Justification for the application of SPP 3.7/Guidelines despite a relevant exemption applying to part or all of the planning proposal.	
EXEMPTION SCENARIOS	APPLICABLE
(Source: LPS Regulations 2015 Part 10A - Bushfire risk management) Does not apply to land where there is no existing local planning scheme or where a local planning scheme has ceased to have legal effect.	N/A
(Source: Guidelines s1.2.1) For a structure plan or subdivision application, for proposed lot(s) that: • Are not designated as bushfire prone; • Or where there is no increase in the development potential and therefore no intensification of land use or bushfire risk, such as a boundary realignment, that does not restrict the ability to establish or maintain an APZ; and • does not restrict vehicular access to any existing or future habitable building.	N/A
(Source: Guidelines s1.2.1) - For incidental non- habitable buildings or structures located not less than six metres from the habitable building, including but not limited to private garages, carports, patios, storage sheds, outbuildings, swimming pools, spa pools and fences.	N/A
(Source: Guidelines s1.2.1) - For a change of use, minor renovations, extensions, alterations, improvements or repair of an existing habitable building where: • The application does not result in an increase of occupants onsite; and/or • There is no increase in the bushfire risk, such as an extension being further away from the bushfire hazard, or the extension does not restrict vehicular access or the provision of water for the development.	N/A
Assessment Supporting Details: None required.	

Figure 1.4

Bushfire Prone Area

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

WELLSTEAD RD
SWARBRICK RD
CHUDITCH CL
QUOLL CT
NEWBEY GR
POINT HENRY RD
RIDGEWAY DR
SHORT BEACH RD
BLACK ROCKS RD
MAGPIE RISE
TREVALLY PL
NATIVE DOG BEACH RD
GNEISS HILL RD
HORSE HILL RD
SUBJECT SITE
POINT GORDON RD
GULLY RD
LITTLE BOAT HARBOUR RD

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

Subject Site

Bushfire Prone Area 2024

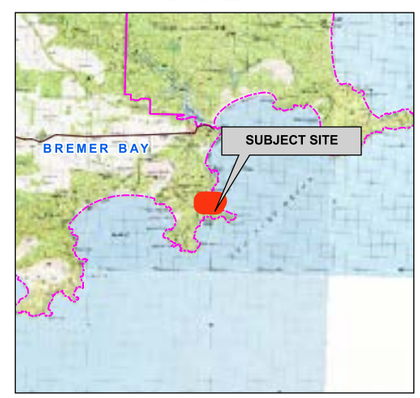
Bushfire Prone Area 1

Bushfire Prone Area 2

0 200 400 600 800 1,000

Metres

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



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 12-01-2026
SCALE (A3): 1 : 20000

BUSHFIRE PRONE PLANNING

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1.3 Required 'Bushfire Planning' Assessments and Documents

INFORMATION PRESENTED IN THIS 'PLANNING' BMP (OR THE BEP) - PROVIDED TO ACCOMPANY THE PROPONENT'S PLANNING SUBMISSION							
The requirements are established by SPP 3.7 Part 4, Guidelines Section 1.2, 4.4, 5.5, 6.4, 7.2, 8.3 and A1.2. The green highlighted column identifies the required information for the subject planning proposal.		Strategic Planning Document		Structure Plan / Subdivision Application		Development Application	
Required Information	Details	Map of Bushfire Prone Areas Designation					
		Area 1 (Urban)	Area 2	Area 1 (Urban)	Area 2	Areas 1 & 2	
Environment - Identification of environmental, biodiversity or conservation values on subject site(s)	Presented in the BMP. Identifies how proposal siting and design avoids and/or minimises clearing of native vegetation in applying required bushfire protection measures.	**BUSHFIRE PLANNING ASSESSMENTS ARE NOT REQUIRED**	✓	✓	✓	✓	
BLA - Broader Landscape Assessment (see note below)	Presented in the BMP. Considers subject site suitability based on exposure to bushfire hazards, potential for landscape scale bushfire, road network and suitable evacuation destinations.		✓	-	✓	-	
BHL - Bushfire Hazard Level Assessment (pre-development)	Presented in the BMP. Can include detail of treatments required to achieve BHL of moderate and/or low.		✓	-	-	-	
BAL - Bushfire Attack Level Assessment	Presented in the BMP in BAL contour map format as a requirement and in table format as an additional option.		-	✓	✓	-	
	Presented in the BMP in table format and/or BAL contour map format – dependant on which is more efficient and effective at presenting the results (e.g. BAL contour map for multiple buildings).		-	-	-	✓	
BPC - Assessment against the relevant Elements (E1 – E4) of the Bushfire Protection Criteria	Presented in the BMP. Strategic planning will necessarily focus on Element 1: Location. Can demonstrate compliance using acceptable solutions and/or an outcomes-based approach.		✓	✓ **Excluding E1**	✓	✓ **Excluding E1**	
BEP - Bushfire Emergency Plan	For vulnerable land uses only. Provided as a separate document or an addition / modification to an existing BEP or site Emergency Management Plan.		-	-	-	-	
LMP – Landscape Management Plan	For vulnerable land uses only. Provided as a separate document or an addendum to the BMP.						
Note: Where a relevant planning proposal (e.g. subdivision) was previously assessed and approved under the SPP 3.7/Guidelines 2015, it is likely that a BLA will not be required. Also, if an application (e.g. subdivision) is compliant with a structure plan and/or a local planning scheme amendment, which were assessed and approved under the 2015 SPP/Guidelines, it is likely that a BLA will not be required. Confirmation from a relevant DPLH officer may be required (DPLH advice to BPP 20/2/2025).							

1.4 Other Documents Relevant to Preparing the BMP

EXPLANATORY INFORMATION

This section identifies any known assessments, reports or plans that have been conducted and prepared previously, or are being prepared concurrently, and are relevant to the subject planning proposal.

They may have implications for the assessment of bushfire hazard threats and the identification and implementation of the bushfire protection measures that are established by this BMP.

RELEVANT DOCUMENTS

Document	Relevant	Exists	To Be Concurrently Developed	Copy Provided by Proponent / Developer	Title
Structure Plan	No	N/A	N/A	N/A	-
Bushfire Management Plan	Yes	Yes	N/A	Yes	43 Horse Hill Road BMP 2024 by Bushfire Prone Planning
Implications for the BMP: A Bushfire Management Plan was previously completed for this site in 2024 for the Worker's Accommodation and Ancillary dwelling					
Preliminary bushfire advice (may include a BAL contour map)	Yes	Yes	N/A	N/A	-
Implications for the BMP: Preliminary bushfire advice was provided prior to completing this report.					
Bushfire Emergency Plan	Yes	No	Yes	N/A	-
Implications for the BMP: A Bushfire Emergency Plan will be prepared at a later date.					
Bushfire Risk Report	No	N/A	N/A	N/A	-
Environmental Asset or Vegetation Survey	Yes	Yes	No	Yes	Vegetation Behaviour and Management at Bremer Bay and Point Henry- Shire of Jerramungup 2015-2016
Refer to Section 2.1 for details.					
Landscape Management Plan	No	N/A	N/A	N/A	-
Revegetation Plan	No	N/A	N/A	N/A	-

2 ENVIRONMENTAL CONSIDERATIONS – NATIVE VEGETATION

EXPLANATORY INFORMATION

Some bushfire prone areas also have high biodiversity values. SPP3.7 objective 5.4 prioritises the retention of native vegetation for biodiversity conservation, environmental protection and landscape amenity.

Clearing or modification of native vegetation for the purpose of land use or development is assessed under **State Planning Policy 2: Environment (SPP 2), State Planning Policy 2.8: Bushland policy for the Perth Metropolitan Region (SPP 2.8)** and relevant environmental legislation. A key objective of these polices is to avoid development that may result in unacceptable environmental damage.

Any 'modification' or 'clearing' of vegetation to reduce bushfire risk is considered 'clearing' under the ***Environmental Protection Act 1986*** (EP Act) and requires a clearing permit under the ***Environmental Protection (Clearing of Native Vegetation) Regulations 2004*** (Clearing Regulations) – unless for an exempt purpose.

Clearing native vegetation is an offence, unless done under a clearing permit or the clearing is for an exempt purpose. Exemptions are contained in the EP Act or are prescribed in the Clearing Regulations (note: these exemptions do not apply in environmentally sensitive areas).

The ***Department of Water and Environmental Regulation*** (DWER) is responsible for issuing 'clearing' permits and the framework for the regulation of clearing. Approvals under other legislation, from other agencies, may also be required, dependent on the type of flora or fauna present.

Local Planning Policy or Local Biodiversity Strategy: Natural areas that are not protected by the above Act and Regulation (or any other National or State Acts) may be protected by a local planning policy or local biodiversity strategy. Permission from the local government will be required for any modification or removal of native vegetation in these Local Natural Areas (LNA's). Refer to the relevant local government for detail.

For further Information refer to Native vegetation clearing permits | Western Australian Government, the Planning for Bushfire Guidelines (as amended) and the Bushfire and Vegetation Factsheet – WAPC, Dec 2021.

2.1 Biodiversity or Conservation Values Identified

EXPLANATORY INFORMATION

The required information, relevant to bushfire planning and informing the production of this BMP, is sourced and presented as indicated below.

Note that where a 'desktop' assessment has been conducted, this should not be considered a replacement for a full Environmental Impact Assessment. It is a summary of potential biodiversity or conservation values at the subject site, inferred from information contained in public available datasets and/or reports, which are only current to the date of last modification.

The information provided in the BMP should be considered indicative where the subject site has not previously been subject to a site-specific environmental assessment by an appropriate professional.

The required information is sourced from the environmental/planning consultant report developed for the subject site and provided to the bushfire consultant (details below when applicable). The information it contains is not repeated in this BMP as it will accompany the planning submission. The implications for the subject planning proposal and this BMP are stated below when relevant.	Yes - Partly

An environmental assessment was undertaken for the wider Bremer Bay and Point Henry region (Vegetation and Management at Bremer Bay and Point Henry – Shire of Jerramungup 2015-2016), encompassing the subject site, to identify relevant conservation priorities. The assessment highlights the importance of conserving intact kwongkan vegetation and mature, healthy open stands of Peppermint woodland, particularly areas supporting larger trees. These conservation areas are shown in Figure 1.2 and have been clearly identified and avoided in the management and design of the development. The site plan has been deliberately configured to work around these communities, minimising environmental disturbance and potential degradation.

The required information is sourced by the bushfire consultant as a 'desktop' assessment from publicly available data bases and/or a local government's local biodiversity strategy or local planning strategy. When applicable, this information is presented on the following pages of this BMP.	Yes - Partly

IDENTIFICATION OF RELEVANT BIODIVERSITY OR CONSERVATION VALUES							
Dataset	Relevant to Subject Planning Proposal	Influence on Bushfire Threat Levels and / or Application of Bushfire Protection Measures	Information Source(s) Applied				Further Action Required by Proponent
			WA Govt. Agency Dataset (ID)		Landowner or Developer Statements	Environmental Asset or Vegetation Survey Report	
Department of Biodiversity, Conservation and Attractions (DBCA) Datasets							
Conservation Category Wetlands and Buffer (geomorphic wetlands – relevant area)	N/A	No	☒	DBCA-019	☐	☐	None
RAMSAR Sites (wetlands of international importance)	N/A	No	☒	DBCA-010	☐	☐	None
Threatened and Priority Flora	Unlikely	Unlikely	Restricted Scale of Data Available (security)	DBCA-036	☐	☐	Confirm with relevant agency
Threatened Ecological Communities	Unlikely	Unlikely		DBCA-038	☐	☐	Confirm with relevant agency
Legislated Lands and Waters (national/conservation parks, nature/crown reserves, state forest)	N/A	No	☒	DBCA-011	☐	☐	None
Department of Planning, Lands and Heritage (DPLH) Datasets							
Bush Forever Areas 2000	N/A	No	☒	DPLH-019, 022 and MRS Bush Forever	☐	☐	None
Department of Water and Environmental Resources (DWER) Datasets							
Clearing Regulations – Environmentally Sensitive Areas	N/A	No	☒	DWER-046	☐	☐	None
Swan Bioplan Regionally Significant Natural Areas 2010	N/A	No	☒	DWER-070	☐	☐	None

ADDITIONAL INFORMATION

There are no relevant biodiversity or conservation values identified within the subject site or adjacent that would influence the application of the Bushfire Protection Measures.

The accuracy of this data and consequently its application to the subject site, should be confirmed with the relevant local government authority and/or state agency.

Figure 2.1

Environmental Considerations Map

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

DON ENDE DR
MARY RD
Pelican Park
BREMER BAY RD
FREEMAN DR
BORDEN-BREMER BAY RD
FRANTOM WAY
Bremer Bay Golf Club
O'DEA RD
WHITE TRAIL RD
WELLSTEAD RD
Glasse Island Nature Reserve
Bremer Bay Boat Ramp
Fitzgerald River National Park
SWARBRICK RD
POINT HENRY RD
RIDGEWAY DR
BLACK ROCKS RD
NATIVE DOG BEACH RD
GNEISS HILL RD
SUBJECT SITE

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

- Subject Site
- Reserves

DBCA Legislated Landsand Waters (DBCA-011)

- National Park

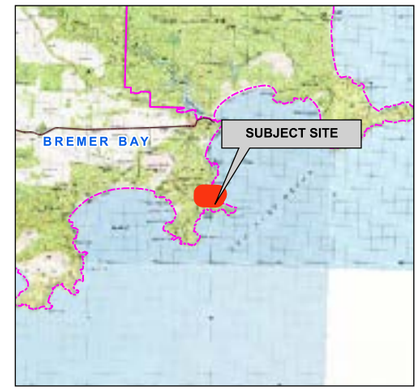
South Coast Significant Wetlands DBCA_018

- Conservation Class

0 500 1,000 1,500 2,000 2,500

Metres

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



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 12-01-2026
SCALE (A3): 1 : 40000

BUSHFIRE PRONE PLANNING

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2.2 Response of the Planning Proposal to Protection of Native Vegetation

The protection of native vegetation is to be prioritised by avoiding areas that would require clearing or modification of native vegetation, specifically for the purpose of bushfire mitigation (BMP Manual, November 2024 DPLH).

SOLUTIONS APPLIED TO MINIMISE NATIVE VEGETATION REMOVAL / MODIFICATION	
Clearing and/or modification of native vegetation is proposed and necessary.	Yes

Proposed Clearing or Modification:

The proposed clearing for the Asset Protection Zone (APZ) involves the removal or management of vegetation within a defined area around the existing dwelling and proposed on-site shelter to reduce bushfire risk. The vegetation management will ensure that the administration building is only exposed to 29kW and the on-site shelter is exposed to 10kW of radiant heat and provides a buffer against the surrounding bushfire-prone vegetation. This zone will primarily consist of the removal of dense scrub and vegetation that poses a fire threat, while retaining some vegetation and creating defensible space around the buildings. The APZ will be managed to maintain a reduced fuel load, improving accessibility for firefighting efforts and limiting the potential for direct flame contact or radiant heat exposure to the structures.

Demonstration of why the planning proposal cannot be re-designed or re-located to avoid clearing and/or modifying native vegetation.

The proposed planning proposal cannot be re-designed or re-located to avoid clearing and/or modifying native vegetation, as almost the entire site is densely vegetated, with the exception of areas cleared for roads, car parks, and existing dwellings. The surrounding scrub vegetation extends throughout the site, and relocating the development would still require some level of clearing due to the continuous nature of the vegetation. Furthermore, the site's topography, characterised by significant slopes and uneven ground, restricts alternative design options without compromising bushfire safety or access. As such, vegetation clearing is necessary to establish required Asset Protection Zones and comply with bushfire safety measures, making re-design or relocation unfeasible. The proposal to pursue low-impact, nature-based 'glamping' accommodation on the subject site, (designed to avoid the need for compliance with AS 3959 and extensive Asset Protection Zones (APZs)) demonstrates that careful planning and design has been undertaken to minimise the development footprint and reduce modification of existing vegetation.

Conservation Response	
The proposal reserves native vegetation for conservation, recreation or environmental protection purpose. These can include ecological linkage, local natural area, waterway, or foreshore area or wetland buffer.	N/A
Siting / Design / Construction Responses	
Reduction in the proposed intensification of land use or development potential.	N/A
Containing or clustering areas of intensification of land use to reduce clearing requirements.	N/A
Consideration of locating proposed development to have greater initial vegetation separation distances from bushfire hazards by utilising non-vegetated interfaces.	N/A
Modification or redesign of the proposed areas of intensification of land use to avoid areas with high environmental, biodiversity or conservation values.	N/A
The proposal has applied a reduction in the intensification of land use or development potential (e.g. reduced lot yield or smaller building footprints), to ensure the retention of greater areas of native vegetation while achieving the required vegetation separation distances to limit exposure to unacceptable levels of potential bushfire impact.	N/A

The proposal situates required non-vegetated elements (e.g. footpaths, paved areas, roads, parking, open drainage channels, and major services delivery installed in common corridors), between bushfire hazards and elements at risk – to effectively achieve required vegetation separation distances with less vegetation clearing and/or modification.	N/A
The proposal applies building envelopes, and these have located to minimise the requirement to clear and/or modify native vegetation.	N/A
The proposal utilises the clustering habitable buildings to reduce requirements for native vegetation clearing and/or modification.	N/A
The proposal aligns roads and pathways to work around trees and other vegetation, preserving their ecological values.	N/A
The proposal establishes requirements for the construction of building(s) to satisfy the requirements corresponding to higher BAL ratings to ensure a reduced vegetation separation distance requirement.	N/A

2.3 Vegetation Management Plans with Implications for the BMP

EXPLANATORY INFORMATION

This section identifies the area(s) of land (supporting vegetation), within or near the subject site (i.e. onsite or offsite) to which one or more of the following scenarios and their corresponding management actions applies.

If none of these scenarios is relevant to the subject planning proposal, this is stated.

1. Area(s) subject to a **LANDSCAPE PLAN THAT RESULTS IN RELEVANT ELEMENTS AT RISK BEING EXPOSED TO A LOW BUSHFIRE THREAT LEVEL** from existing or planned area(s) of vegetation and establishes the following management actions:

    (a) To apply landscaping design (including the modification and/or establishment of plants/shrubs/trees), that will enable the area(s) to be excluded from classification under AS 3959 BAL determination methodology;

    (b) To actively manage the area(s) to maintain the low bushfire threat level in perpetuity. Thereby ensuring the applicable bushfire protection measures, applied in accordance with the BMP, remain effective;

    (c) To achieve and maintain the low threat state through using a combination of mechanisms including:

        (i) Minimising vegetation fuel loads through design and ongoing management;

        (ii) Using low flammability and/or higher moisture content species;

        (iii) Incorporating non-vegetated elements; and

    (d) To identify the entity responsible for ensuring the landscape plan is complied with in perpetuity and when required, will contain written confirmation of their acceptance of the responsibility.

2. Area(s) subject to a **LANDSCAPE PLAN THAT RESULTS IN RELEVANT ELEMENTS AT RISK BEING EXPOSED TO A REDUCED BUSHFIRE THREAT LEVEL** from existing or planned area(s) of vegetation and establishes the following management actions:

    (a) To apply landscaping design involving the removal and/or modification of existing vegetation that will enable the area(s) to be classified as a lower threat class under AS 3959:2018 BAL determination methodology;

    (b) To actively manage the area(s) to maintain the reduced bushfire threat level in perpetuity. Thereby ensuring the applicable bushfire protection measures, applied in accordance with the BMP, remain effective;

    (c) To identify the entity responsible for ensuring the landscape plan is complied with in perpetuity and when required, will contain written confirmation of their acceptance of the responsibility.

3. Area(s) subject to a **REVEGETATION PLAN THAT MAY RESULT IN RELEVANT ELEMENTS AT RISK BEING EXPOSED TO AN ADDITIONAL BUSHFIRE HAZARD AND/OR AN INCREASED BUSHFIRE THREAT LEVEL** from an existing area(s) of vegetation and establishes the following information:

    (a) The location of the areas to be revegetated (as distinct from natural regeneration which is accounted for in the vegetation classification under AS 3959 BAL determination methodology); and

    (b) A description of the planned design regarding density and species of plants/shrubs/trees to inform the bushfire consultant's classification of the vegetation under AS 3959:2018 BAL determination methodology.

Relevance of the Stated Scenarios to the Subject Planning Proposal	No scenarios are relevant.

3 THE BUSHFIRE HAZARD – POTENTIAL IMPACT - LANDSCAPE AND VEGETATION DATA

3.1 Bushfire Attack Level (BAL) Assessment Summary (Contour Map Format)

EXPLANATORY INFORMATION

Caution! Future building works require a 'determined' BAL rating for building permit applications. When a BAL contour map is being used for planning assessment purposes, (as opposed to a building assessment purpose), the required 'determined' BAL rating typically is not able to be derived from the map (there are only limited scenarios where this is possible).

The BAL ratings identified from the map will more likely be only 'indicative' of what can be achieved – with planning compliance for this factor being achieved when BAL-29 is indicated.

Otherwise, an additional assessment of the site data for building application purposes is required, and potentially approval will need to be obtained for native vegetation modification and/or removal from the relevant authority.

Refer to Appendix B2 for additional information and guidance regarding interpretation of the BAL Contour Map.

3.1.1 BAL Determination Methodology and Location of Data and Results

LOCATION OF DATA & RESULTS					
BAL Determination Methodology		Location of the Site Assessment Data			Location of the Results
AS 3959:2018	Applied to Assessment	Classified Vegetation and Topography Map(s)	Calculation Input Variables		Assessed Bushfire Attack Levels and/or Radiant Heat Levels
			Summary Data	Detailed Data with Explanatory and Supporting Information	
Method 1 (Simplified)	Yes	Figure 3.1 and 3.1.1	Table 3.2	Appendix A1	Table 3.1 Table 3.3 / BAL Contour Map
Method 2 (Detailed)	Yes	Figure 3.1 and 3.1.1	Table 3.2	Appendix A2	

Reasons for the Application of the Method 2 Procedure	
1.	To apply the requirement to assume a higher flame temperature of 1200K when determining the availability of suitable onsite sheltering options for tourism vulnerable land uses (Guidelines v1.4 s5.5.3.1.3). This ensures the margin of safety is increased.

Identification of the specific issues associated with the site and/or proposed development that have necessitated the use of the Method 2 procedure:

A Method 2 assessment is adopted to calculate the maximum 10kW/m^2 radiant heat flux level buffer from classified vegetation. This is to address the suitability of structures within the site to be used as a shelter in place building.

3.1.2 BAL Ratings Derived from the Contour Map

Table 3.1: Indicative and determined BAL(s) for existing and/or proposed building works.

BUSHFIRE ATTACK LEVEL FOR EXISTING/PLANNED BUILDINGS/STRUCTURE [1]		
Building/Structure Description	Indicative BAL [2]	Determined BAL [2]
Eco-tents	N/A	BAL-FZ
Toilet block	N/A	BAL-FZ
Existing single house – proposed reception	BAL-29	N/A
Existing shed – proposed onsite shelter	BAL-12.5	N/A

[1] The assessment data used to derive the BAL ratings is sourced from Table 3.1 and Figure 3.2 'BAL Contour Map'.

[2] Refer to the start of Section 3 for an explanation of indicative versus determined BAL ratings.

3.1.3 Site Assessment Data Applied to Construction of the BAL Contour Map(s)

RELEVANT CLASSIFIED VEGETATION	
Identification of Classified Vegetation that is Relevant to the Production of the BAL Contour Map(s)	Relevant Vegetation Map
The relevant vegetation will be all areas of classified vegetation that exist at the time of the site assessment – both within the subject site (onsite) and external to the subject site (offsite).	Figure No. 3.1
The relevant vegetation will be any area of classified vegetation - within the subject site (onsite) that will remain at the intended end state of the subject development once earthworks, any clearing and/or landscaping and re-vegetation have been completed.	Figure No. 3.1.1
The relevant vegetation for the post-development BAL contour map will be any area of classified vegetation - within the subject site (onsite) that will remain at the intended end state of the subject development once earthworks, any clearing and/or landscaping and re-vegetation have been completed.	Figure No.3.2
Supporting Assessment Details: None required.	

Table 3.2: Calculation inputs applied to deriving the vegetation separation distances corresponding to different levels of potential radiant heat transfer.

DATA APPLIED TO CALCULATE THE SITE SPECIFIC VEGETATION SEPARATION DISTANCES CORRESPONDING TO POTENTIAL RADIANT HEAT TRANSFER LEVELS [1]												
Applied BAL Determination Method		METHOD 1 - SIMPLIFIED PROCEDURE (AS 3959:2018 CLAUSE 2.2) AND METHOD 2 - DETAILED PROCEDURE (AS 3959:2018 APPENDIX B)										
The Calculation Input Variables - Corresponding to the Applied BAL Determination Method [2]												
Methods 1 and 2		Method 1		Method 2								
Vegetation Classification		FDI	Effective Slope		Site Slope	FFDI or GFDI	Flame Temp.	Elevation of Receiver	Flame Width	Fireline Intensity	Flame Length	Modified View Factor
			Applied Range	Measured								
Area	Class		degree range	degrees	degrees		K	metres	metres	kW/m	metres	% Reduction
1	(C) Shrubland	80	Downslope >15-20	18	-	-	-	-	-	-	-	-
2	(D) Scrub	80	Downslope >5-10	9	-	-	-	-	-	-	-	-
3	(D) Scrub	80	Downslope >0-5	5	5	80	1200	-	-	-	-	-
4	(D) Scrub	80	Upslope or flat 0	0	0	80	1200					
5	Excluded cl 2.2.3.2(e)	N/A	N/A	N/A	N/A	N/A	Select.	-	-	-	-	-
6	Excluded cl 2.2.3.2(f)	N/A	N/A	N/A	N/A	N/A	Select.	-	-	-	-	-

Note 1: The values used to indicate levels of potential radiant heat transfer (from fire in bushfire prone vegetation to exposed elements at risk), will be stated in subsequent tables as either as a bushfire attack level (BAL) and/or as kilowatts per square metre (kW/m2), as relevant to the application of the value and the type and use of the element at risk.

Note 2: All data and information supporting the determination of the classifications and values stated in this table is presented in Appendix A. Where the values are stated as 'default' these are either the values stated in AS 3959:2018, Table B1 or the values calculated as intermediate or final outputs through application of the equations of the AS 3959:2018 BAL determination methodology. They are not values derived by the assessor.

Table 3.3: Vegetation separation distances corresponding to the stated levels of potential radiant heat transfer.

THE CALCULATED (SITE SPECIFIC) VEGETATION SEPARATION DISTANCES CORRESPONDING TO THE STATED LEVEL OF POTENTIAL RADIANT HEAT TRANSFER (METRES) [1]									
Vegetation Classification		Maximum Radiant Heat Transfer (Flux)							
		>40 kW/m^2	40 kW/m^2	29 kW/m^2	19 kW/m^2	12.5 kW/m^2	N/A [2]	10 kW/m^2	2 kW/m^2
		Bushfire Attack Levels							
Area	Class	BAL-FZ	BAL-40	BAL-29	BAL-19	BAL12.5	BAL-LOW		
1	(C) Shrubland	<10	10-<15	15-<22	22-<31	31-<100	>100	-	-
2	(D) Scrub	<12	12-<17	17-<24	24-<35	35-<100	>100	-	-
2	(D) Scrub	<11	11-<15	15-<22	22-<31	31-<100	>100	49	-
3	(D) Scrub	<10	10-<13	13-<19	19-<27	27-<100	>100	45	-
4	Excluded cl 2.2.3.2(e)	-	-	-	-	-	-	-	-
5	Excluded cl 2.2.3.2(f)	-	-	-	-	-	-	-	-

Note 1: The calculated results are illustrated in Figure 3.2 as a BAL Contour Map and/ or additional defining lines as necessary. All applied calculation input variables are presented in Table 3.2. A copy of the radiant heat calculator output for each area of classified vegetation is presented in Appendix A3.

Note 2: The BAL-LOW rating does not represent a maximum level of radiant heat transfer. The rating is applied when the separation distance is at least 100m from all classified vegetation except Grassland, for which 50m applies.

Figure 3.1

Classified Vegetation & Topography (Existing)

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

AREA 3
Class (D) Scrub
Effective Slope >0-5°

AREA 4
Class (D) Scrub
Effective Slope 0°

AREA 1
Class (C) Shrubland
Effective Slope >15-20°

AREA 2
Class (D) Scrub
Effective Slope >5-10°

AREA 5
Excluded

AREA 4
Class (D) Scrub
Effective Slope 0°

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

- Subject Site
- Cadastral
- Photo and Direction
- 150m Assessment Area
- 100m Assessment Area

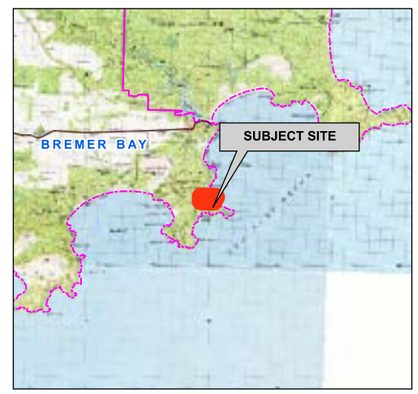
Existing Buildings
- House
- Shed

Classified Vegetation
- Shrubland
- Scrub
- Excluded 2,2,3,2 (e)
- Excluded 2,2,3,2 (f)

0 20 40 60 80 100

Metres

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



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 13-01-2026
SCALE (A3): 1 : 2400

BUSHFIRE PRONE PLANNING

Disclaimer and Limitation: This map has been prepared for bushfire management planning purposes only. All depicted areas, contours and any dimensions shown are subject to survey. Bushfire Prone Planning does not guarantee that this map is without flaw of any kind and disclaims all liability for any errors, loss or other consequence which may arise from relying on any information depicted.

Figure 3.1.1

Classified Vegetation & Topography (Post Dev)

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

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

- Subject Site
- Cadastral
- 100m Assessment Area
- 150m Assessment Area
- Driveways / Accessways
- Indicative Turning Circle
- Indicative Firefighting Water Tank
- Rainwater Tank
- 3-metre wide exclusion zone
- 10kW APZ
- BAL-29 APZ
- APZ Distance (m)

Existing Buildings

- House (Proposed check-in building)
- Shed (Proposed onsite shelter)

Proposed Buildings

- Worker's Accommodation
- Ancillary Dwelling
- Eco-tent
- Toilet block

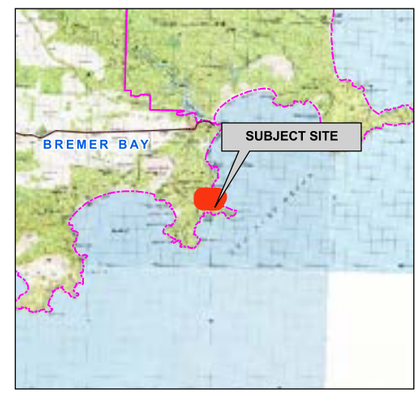
Post Veg

- Shrubland
- Scrub
- Excluded 2,2,3,2 (e)
- Excluded 2,2,3,2 (f)

0 20 40 60 80 100

Metres

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



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 17-07-2026
SCALE (A3): 1 : 2400

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Figure 3.2

BAL Contour Map

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

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

- Subject Site
- Cadastral
- 100m Assessment Area
- Driveways / Accessways
- Indicative Turning Circle
- Indicative Firefighting Water Tank
- 3-metre wide exclusion zone
- 10kW APZ
- BAL-29 APZ
- APZ Distance (m)

Existing Buildings

- House (Proposed check-in building)
- Shed (Proposed onsite shelter)

Proposed Buildings

- Worker's Accommodation
- Ancillary Dwelling
- Eco-tent
- Toilet block

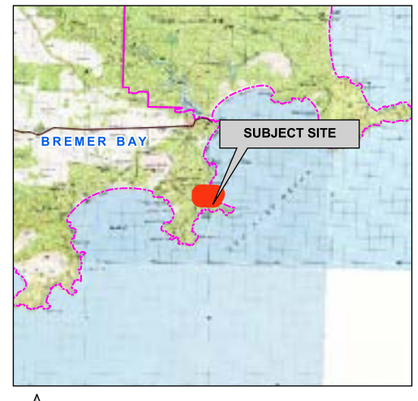
Bushfire Attack Levels

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

0 20 40 60 80 100

Metres

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



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 17-07-2026
SCALE (A3): 1 : 2200

BUSHFIRE PRONE PLANNING

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4 IDENTIFICATION OF BUSHFIRE HAZARD ISSUES

EXPLANATORY INFORMATION

Section Content Guidance (DPLH/WAPC)

'Bushfire Hazard Issues' is a section of the Bushfire Management Plan (BMP) in accordance with guidance presented in the BMP Manual (DPLH/WAPC, November 2024).

The Manual indicates the intent of applying its guidance with the following statement:

> *"The standardisation of BMP's improves efficiencies in decision making at local and state government level by promoting the clear and succinct presentation of information required under SPP 3.7 and the Guidelines."*

Bushfire Prone Planning's Approach

In complying more broadly with the above efficiency intentions, Bushfire Prone Planning (BPP) will also seek to:

- Improve the efficiency of BMP development by its consultants; and
- Ensure the readability and understanding of the BMP by persons who will need to read the document.

Key to achieving these efficiency and comprehension outcomes is the design and quality of the explanatory and assessment content of the BMP. This includes the effective use of Section 4 by not repeating content and assessment summaries that are presented in other sections of the BMP.

Typically, bushfire hazard issues will be appropriately addressed in Sections 2 and 3 of the BMP which identify:

- The required environmental considerations; and
- The assessment of potential levels of bushfire impact and their justification.

Limitation on Section 4 Content

As a consequence of the above considerations, content in this section will be limited to raising decision maker awareness regarding additional site specific matters that otherwise may not be a component of the standard BMP bushfire hazard assessment.

Additional information is provided on an 'as necessary' basis for the following scenarios:

1. When local governments have provided jurisdiction specific bushfire hazard assessment and/or management guidance that needs to be addressed. How these have been considered by the bushfire consultant in conducting their bushfire hazard assessments will be discussed.
2. When, due to difficult site conditions, additional explanation and justification of the bushfire hazard assessment process undertaken by the bushfire consultant would assist decision making.
3. Matters are identified when they are either not considered or are only partially considered, under the bushfire hazard assessments conducted in accordance with SPP 3.7/Guidelines. These include matters that would potentially reflect poorly on the bushfire consultant's professional integrity if ignored.

For the subject planning proposal, has the bushfire practitioner determined (in accordance with the explanatory information above), that presenting additional information in this section is necessary?	No
Additional bushfire hazard information is provided below for the relevant scenarios.	N/A

5 ASSESSMENT AGAINST THE BUSHFIRE PROTECTION CRITERIA (BPC)

EXPLANATORY INFORMATION

State Planning Policy 3.7 Bushfire (SPP 3.7) establishes policy outcomes (cl. 6) that "specify the role of planning and development in contributing to the overall objectives" of the policy.

The policy outcomes are incorporated into the four elements of the bushfire protection criteria established in the Planning for Bushfire Guidelines (Guidelines).

CONSEQUENTLY, TO SATISFY THE OBJECTIVES AND POLICY OUTCOMES OF SPP 3.7, A PLANNING PROPOSAL IN A DESIGNATED BUSHFIRE PRONE AREA IS REQUIRED TO DEMONSTRATE THAT COMPLIANCE WITH THE BUSHFIRE PROTECTION CRITERIA CAN BE ACHIEVED.

The Guidelines in Section 2.2.1 establish two pathways to demonstrate compliance:

1. The deemed to comply pathway - in which compliance is able to be demonstrated with all relevant acceptable solutions associated with each Element, for a specific planning stage or use; or
2. An alternative pathway when all relevant acceptable solutions cannot be fully achieved, which utilises either:
    (a) The outcomes-based approach (established in SPP 3.7 cl. 6) alone; or
    (b) A combination of the outcomes-based approach and the acceptable solutions.

For the subject planning proposal:

- The assessment applying the deemed to comply pathway assessment is presented in Section 5.3.
- When an assessment applying the alternative pathway is necessary, the required additional information is presented in Section 5.4.

5.1 Local Government Variations to Apply

EXPLANATORY INFORMATION

1. Local governments may add to or modify the acceptable solutions contained within the Guidelines to recognise special local or regional circumstances that reinforce the SPP 3.7 objectives and outcomes. This is achieved through regional or local variations that form part of a local planning strategy and/or local planning scheme via a scheme amendment or special control area.

   This could include acceptable solutions that address topography, vegetation or climate to the satisfaction of the Western Australian Planning Commission (WAPC) that the modifications comply with the corresponding SPP 3.7 objectives and outcomes. (Planning for Bushfire Guidelines, s. 3.4, 2024).
2. Under the relevant state legislation (LPS Regulations 2015), SPP 3.7 does not apply to hosted or unhosted short-term rental accommodation. However, the local government under its Local Planning framework (i.e. Strategy / Scheme and Policy as applicable), may require that certain bushfire protection measures or variations to the measures (the bushfire protection criteria), established by SPP 3.7 and the Guidelines, are to be applied.

Endorsed regional or local variations to the acceptable solutions apply to the assessments against the Bushfire Protection Criteria for the planning proposal?	None known or identified
The proposed land use for hosted or unhosted short-term rental accommodation, and the local government requires certain bushfire protection measures, contained within the BPC, to be applied, that under the LPS Regulations 2015, would otherwise not be required?	None known or identified

5.2 Assessment Summary

PATHWAY APPLIED TO DEMONSTRATE ACHIEVING POLICY OUTCOMES OF SPP 3.7 BUSHFIRE [1] INCLUDES SUMMARY OF THE PROPOSAL'S ASSESSMENT AGAINST THE BPC ACCEPTABLE SOLUTIONS			
DEVELOPMENT – VULNERABLE TOURISM LAND USES AND DAY USES			
The Acceptable Solutions Corresponding to the Policy Outcomes of SPP 3.7 Bushfire as Incorporated into the Elements of the Bushfire Protection Criteria (Guidelines)	Acceptable Solutions Pathway Compliance Status	Alternative Pathway [2] Outcomes-Based Approach Only	Alternative Pathway [2] Combination of Pathways
ELEMENT 2: SITING AND DESIGN:	Fully Compliant	-	-
A2.1a Siting and design	Fully Compliant		
A2.1b Asset Protection Zone (APZ)	Fully Compliant		
A2.2a Siting in an area with a radiant heat impact exceeding 29 kW/m² (BAL-40 or BAL-FZ)	Fully Compliant		
A2.2b Asset Protection Zone (APZ)	Fully Compliant		
A2.3 Clearing of native vegetation	Fully Compliant		
A2.4 Landscape management plan	Not Applicable		
A2.5 Onsite shelter (safer building) - schools	Fully Compliant		
ELEMENT 3: VEHICULAR ACCESS:	Partly Compliant	-	✓
A3.1 Public roads	Fully Compliant		
A3.2a Access routes	Not Compliant		
A3.2b Access routes for a day use with no overnight accommodation	Not Applicable		
A3.3a No-through roads	Not Compliant		
A3.3b No-through roads technical requirements	Not Compliant		
A3.4 Emergency access way	Not Compliant		
A3.5 Onsite shelter	Not Compliant		
A3.6 Fire service access route	Not Applicable		
A3.7 Internal vehicular access & private driveways	Fully Compliant		
A3.8 Signage	Fully Compliant		
ELEMENT 4: WATER SUPPLY:	Fully Compliant	-	-
A4.1 Water supply	Fully Compliant		
Note 1: Achieving the objectives and policy outcomes of SPP 3.7 Bushfire can be demonstrated through either the acceptable solutions pathway, the outcomes- based approach only, or a combination of both pathways (refer to Guidelines s 2.2.1). Note 2: When applied, the required additional assessment details are provided in Section 5.4 of this BMP. The content and comprehensiveness of the assessment will vary dependant on the specific conditions of the broader landscape, the development site, its use and the degree to which any relevant acceptable solutions cannot be complied with.			

5.3 BPC 8.2: Development – Vulnerable Tourism Land Uses and Day Uses - Acceptable Solutions Assessment

5.3.1 Element 2: Siting and Design

ELEMENT 2: SITING AND DESIGN (DEVELOPMENT – VULNERABLE TOURISM LAND USES LAND USES AND DAY USES)

EXPLANATORY INFORMATION

Refer to Appendices B1 and B3 of this BMP for additional information and to *the bushfire protection measure implementation checklist in Section 6 for the APZ dimensions applicable to this planning proposal.*

The Planning Assessment and the APZ

This assessment is a 'planning assessment' being conducted for planning approval purposes only. All details of acceptable solution requirements are established in the Planning for Bushfire Guidelines (Guidelines) – WA Department of Planning, Lands and Heritage (DPLH, as amended).

> *Note the assessment is not conducted for building approval purposes. The derivation of 'determined' BAL ratings for building permit applications is not the intended outcome of this planning assessment. However, in limited situations, the presented indicative BAL rating might also be considered as 'determined' as an incidental outcome.*

To comply with the relevant acceptable solutions contained in the 'Bushfire Planning Guidelines', the subject planning proposal must demonstrate that the required minimum sized asset protection zone (APZ) - subject to location constraints and allowances established by the Guidelines - can be installed surrounding a habitable or specified building.

Approved BMP's and the APZ Dimensions to be Implemented

An approved BMP, unless stated otherwise, is only approving the installation of an APZ comprised of:

- The minimum dimensions that ensure the radiant heat impact of a bushfire (on building works) does not exceed 29 kW/m² (BAL-29); or
- For specific 'vulnerable' land uses, the minimum dimensions that ensures the radiant heat impact of a bushfire (on building works) does not exceed the level of radiant heat exposure stated in the applicable acceptable solution; or
- The specific minimum dimensions that may be applied through the application of an outcomes-based approach.

Consequently, the 'minimum' dimensions of the approved APZ are also the 'maximum' approved dimensions when installation of the APZ will require the modification/removal of native vegetation. Installing a larger dimensioned APZ, to lower the determined BAL rating of specific building works, will need additional approval from the relevant planning authority.

The following bushfire planning policy and guidance potentially limit installed APZ dimensions:

- SPP 3.7 Bushfire, Policy Objectives, cl. 5.5 states – "Prioritise the retention of native vegetation for biodiversity conservation, environmental protection and landscape amenity.
- SPP 3.7 Bushfire, Policy Outcomes, cl. 6.2 - establishes that clearing of native vegetation is to be avoided or minimised in managing or mitigating bushfire risk.
- The Guidelines, Appendix B2, B.2.1 states - "clearing or modification of native vegetation to reduce the radiant heat impact below 29 kW/m² is generally not supported."

	The Outcome of State Planning Policy 3.7 Bushfire (and the BPC) to be Achieved
O2	**Ensure siting and design solutions:** • **Manage or mitigate the bushfire risk to people, property and infrastructure; and** • **Avoid, or where unavoidable, minimises the clearing of native vegetation. (SPP 3.7, 6.2)**
E2	Acceptable Solutions Pathway - Compliance Statement
	The planning proposal is fully compliant with all applicable acceptable solutions and therefore achieves the required outcomes of this element.
	Alternative Pathway Applied to Demonstrate Ability to Achieve SPP 3.7 Outcomes
	N/A

ACCEPTABLE SOLUTIONS - ASSESSMENT STATEMENTS

Check Box Legend: ☑ Relevant & met ☒ Relevant & not met ⃠ Not relevant

A2.1a Siting and design	Applicable:	Yes	Compliant:	Yes

☑ ☐ ☐	Every habitable building achieves a radiant heat impact not exceeding 29 kW/m² (BAL-29).
☐ ☐ ⃠	A2.1a is not applicable to the subject planning proposal as it cannot be complied with and an alternative acceptable solution A2.2a (dealing with the same protection measure), is provided and establishes a higher level of radiant heat impact that will be considered for planning approval, if it can be satisfactorily demonstrated that the allowable constraints apply to the subject development site.

Assessment Supporting Details: All habitable buildings aside from the eco-tents (considered tolerable loss – see section A2.2) can achieve a radiant heat impact not exceeding 29 kW/m² (BAL-29). Refer to Figure 3.2.

A2.1b Asset Protection Zone (APZ)	Applicable:	Yes	Compliant:	Yes

☐ ☐ ⃠	A2.1b is not applicable to the subject planning proposal because it is a requirement associated with the compliant application of A2.1a. Given A2.1a is not applicable to the subject planning proposal, A2.1b is also not applicable.

Where a habitable building(s) cannot be wholly within an area with a radiant heat impact not exceeding 29 kW/m² (BAL-29) in its pre-development state, an indicative APZ is to be provided and meet the following requirements for width, location and management:

☑ ☐ ☐	**APZ Width:** The APZ, when measured from the development site (or any external wall or supporting post or column), is of sufficient size to ensure the radiant heat impact of a bushfire does not exceed 29 kW/m² (BAL-29) to any part of the building, in all circumstances.
☑ ☐ ☐	**APZ Location – Option 1:** The indicative 'Planning BAL-29' APZ can be contained solely within the boundaries of the lot.
☐ ☐ ⃠	**APZ Location – Option 2:** The indicative 'Planning BAL-29' APZ cannot be contained solely within the boundaries of the lot. However, the relevant vegetation on the adjoining land / lot(s) is, and will continue to be, on an ongoing basis in perpetuity, low threat as per: • Clause 2.2.3.2 of AS 3959 (including non-vegetated land such as a sealed or unsealed road, or a water body); or

	• The requirements of the Guidelines Appendix B.2, Table 9 – APZ technical requirements; or • The alternative standard in the local planning scheme (when it exists).
☑ ☐ ☐	**APZ Management:** The APZ is (or can and will be) managed in accordance with the requirements established in the Guidelines, Appendix B.2 or the alternative standard in the gazetted local planning scheme (when it exists).

Assessment Supporting Details:

The proposed onsite shelter and existing habitable building (to be converted to an admin building) can achieve a radiant heat impact not exceeding 29 kW/m^2 (BAL-29). Refer to Figure 3.2.

The proposed eco-tents are 'standalone' structures, that are considered tolerable loss – refer to section 2.2.

A2.2a Siting in an area with a radiant heat impact exceeding 29 kW/m² (BAL-40 or BAL-FZ)	Applicable:	Yes	Compliant:	Yes

☐ ☐ ⊘	A2.2a is not applicable to the subject planning proposal because A2.1a can be complied with.
☑ ☐ ☐	The habitable building(s) or structure(s) is sited with a radiant heat impact exceeding 29 kW/m² (i.e. BAL-40 or BAL-FZ) and is unable to establish an APZ in accordance with A2.1b. However, meeting **all** of the following established requirements allows consideration for approval:
☑ ☐ ☐	• There are no bushfire construction standards required under the BCA; and
☑ ☐ ☐	• There are demonstrated site characteristics and/or environmental values that prevent the achievement of a radiant heat impact not exceeding 29 kW/m2 (BAL-29); and
☑ ☐ ☐	• It is acknowledged within the bushfire management plan that it is understood that in the event of a bushfire it is possible the building or structure will be damaged or destroyed; and
☑ ☐ ☐	• The vegetation immediately surrounding the building(s) or structure(s) can and will be managed as defendable space in accordance with Appendix B.2, Table 9 – APZ technical requirements.

Assessment Supporting Details:

The proposed eco-tents are considered by the proponent as a tolerable loss and cannot be constructed to a BAL rating. Therefore, as per this acceptable solution no APZ is required, and the eco-tents will be constructed in an area above BAL-29.

A2.2b Asset Protection Zone (APZ)	Applicable:	Yes	Compliant:	Yes

☐ ☐ ⊘	A2.2b is not relevant to the subject planning proposal because A2.2a is not applicable.
☑ ☐ ☐	The provision of an APZ with width and location requirements in accordance with acceptable solution A2.1b (to result in BAL-29 exposure), cannot be achieved for the subject planning proposal. Instead, the vegetation immediately surrounding the habitable building, to the extent possible within the lot, is to be managed as defendable space in accordance with Appendix B.2, Table 9 – APZ technical requirements.

Assessment Supporting Details: A defendable space of 3-metres will be maintained around the eco-tents.

A2.3 Clearing of native vegetation	Applicable:	Yes	Compliant:	Yes
☑ ☐ ☐	The development avoids, or where unavoidable, minimises the clearing of native vegetation.			
Assessment Supporting Details: Some targeted clearing/thinning of native vegetation is unavoidable to establish APZs around key habitable building, noting clearing has been significantly minimised as the eco-tents are considered tolerable loss and do not require extensive APZ's; enabling greater retention of native vegetation within the site.				
A2.4 Landscape management plan	Applicable:	No	Compliant:	-
☐ ☐ ⊘	A landscape management plan has been prepared to identify ongoing onsite vegetation management.			
Assessment Supporting Details: Not required. Compliance with the standards for Asset Protection Zones (Appendix B2) in perpetuity is a requirement of this BMP.				
A2.5 Onsite shelter (if required)	Applicable:	Yes	Compliant:	Yes
☑ ☐ ☐	An onsite shelter is proposed. It will comply with A3.5 Onsite shelter and can and will meet all the relevant following established requirements.			
☑ ☐ ☐	An onsite shelter building(s) is proposed for which there is sufficient separation distance from the bushfire prone vegetation to avoid exposure to a radiant heat flux exceeding 10 kW/m^2 (applying an assumed flame temperature of 1200 K).			
☑ ☐ ☐	The building(s) identified as suitable for onsite shelter is (or can and will be) designed in accordance with Building Code of Australia and the ABCB Design and Construction of Community Bushfire Refuges Handbook.			
☐ ☐ ⊘	An open space area is proposed to function as an onsite shelter. There is sufficient separation distance between the open space area and the bushfire prone vegetation to avoid exposure to a radiant heat flux exceeding 2 kW/m^2 (applying an assumed flame temperature of 1200 K).			
☑ ☐ ☐	Pedestrian paths to any onsite shelter(s) are (or can and will be) provided and clearly signposted.			
Assessment Supporting Details: The existing shed is proposed as an onsite shelter. This can and will be required to be upgraded to meet the requirements of the Building Code of Australia and the ABCB Design and Construction of Community Bushfire Refuges Handbook. An APZ will be managed around the onsite shelter to ensure the building is not exposed to a radiant heat flux exceeding 10 kW/m^2 (applying an assumed flame temperature of 1200K). See Figure 3.1.1 and section 3.1 for required APZ dimensions. Pedestrian paths will be provided and with appropriate signage.				

5.3.2 Element 3: Vehicular Access

ELEMENT 3: VEHICULAR ACCESS (DEVELOPMENT – VULNERABLE TOURISM LAND USES AND DAY USES)	
All details of acceptable solution requirements are established in the Planning for Bushfire Guidelines (Guidelines) – WA Department of Planning, Lands and Heritage (DPLH, as amended). When relevant, the 'Bushfire Management Plan Guidance for the Dampier Peninsula' (DPLH, 2021 Rev B), is also referenced. The technical construction requirements for access types and components are established in the Guidelines Appendix B.3, Table 10 (certain information is copied and presented in Appendix C of this BMP). The local government will advise the proponent where different requirements are to apply and when any additional specifications such as those for signage and gates are to apply. These are included as an appendix if requested by the local government. ***Note:*** *The following understanding of what constitutes a 'road', and the stated definitions can be important considerations for assessments against an acceptable solution for Element 3.* • *Guidelines Appendix B3: Vehicular Access, identifies a 'road' as being either a public road (that includes a no-through road) or a perimeter road. All other access types (i.e. emergency access ways, fire service access routes, battle-axes and private driveways) are considered a different class of access i.e. they are not 'roads'.* • *SPP 3.7 defines 'no-through road' as "a cul-de-sac or dead end road".* • *SPP 3.7 defines 'two-way access' as "vehicular access from a site in two different directions to at least two different suitable destinations". This allows for required access to potentially be provided by an emergency access way.*	
O3	**The Outcome of State Planning Policy 3.7 Bushfire (and the BPC) to be Achieved**
	Ensure the design and capacity of vehicular access and egress provide: • **For efficient and effective evacuation to a suitable destination(s); and/or** • **As a contingency measure for vulnerable land uses, an on-site shelter, where demonstrated appropriate, as a last resort option. (SPP 3.7, 6.3)**
E3	Acceptable Solutions Pathway - Compliance Statement
	The planning proposal cannot fully comply with all applicable acceptable solutions. The required outcomes of the element cannot be achieved applying only the deemed to comply (acceptable solutions) approach.
	Alternative Pathway Applied to Demonstrate Ability to Achieve SPP 3.7 Outcomes
	An outcomes-based approach is applied (refer to Section 5.4) to demonstrate (to the decision maker) that the relevant risks can be appropriately managed and/or mitigated to a tolerable or acceptable level and the required outcomes are achieved.

ACCEPTABLE SOLUTIONS - ASSESSMENT STATEMENTS					
Check Box Legend:	☑ Relevant & met	☒ Relevant & not met	⃠ Not relevant		
A3.1 Public roads		Applicable:	Yes	Compliant:	Yes
☑ ☐ ☐	Public roads meet (or can and will meet) the technical requirements for minimum vertical clearance (4.5 metres) and minimum weight capacity (15 tonnes - includes bridges, culverts).				
☑ ☐ ☐	Public roads meet (or can and will meet) the technical requirement recommended in the Guidelines in Appendix B3, B3.1 for a minimum horizontal clearance of 6 metres.				

☑ ☐ ☐	Public road technical requirements for minimum horizontal clearance, gradients and curves should be in accordance with the class of road as specified in the Public Works Engineering Australasia (IPWEA) subdivision guidelines, Liveable Neighbourhoods, Austroads Standards, any applicable or relevant Main Roads standards, supplements, policies and any applicable or relevant local government standards or policies. The assessment conducted for the bushfire management plan indicates that it is likely that the proposed development can and will comply with the requirements. However, the applicable class of road, the associated technical requirements and subsequent proposal compliance, will need to be confirmed with the relevant local government and/or Main Roads WA.

Assessment Supporting Details: None required.

A3.2a Access routes	Applicable:	Yes	Compliant:	No

☐ ☐ ⊘	A3.2a is not applicable to the subject planning proposal because will not provide overnight accommodation and consequently is considered a day use. Therefore A3.2b is the applicable acceptable solution.
☐ ☐ ⊘	The subject site is in Area 1 (Urban) (Map of BPA). Public road access, with all-weather surfaces, is to be provided to at least one suitable destination.
☐ ☒ ☐	The subject site is in Area 2 (Map of BPA). Public road access, with all-weather surfaces, is provided in two different directions, to at least two different suitable destinations.

Assessment Supporting Details:

Horse Hill Road is a no-through road that terminates at the subject site. As a result, the site is served by a single access and egress route via Horse Hill Road. This road provides the only viable evacuation and access pathway, leading north toward Bremer Bay Town. The access to the south terminates at the coastline, where access is not suitable for vehicular evacuation or emergency response. Consequently, there is only one practical direction of travel available for site access, egress, and emergency evacuation.

A3.2b Access routes for a day use with no overnight accommodation	Applicable:	No	Compliant:	-

☑ ☐ ☐	A3.2b is not applicable to the subject planning proposal as it intends to provide overnight accommodation and consequently not considered a day use. Therefore A3.2a is the applicable acceptable solution.
☐ ☐ ⊘	The subject site is in Area 1 (Map of BPA). Public road access, with all-weather surfaces, is (or can and will be) provided in one direction to a single suitable destination.
☐ ☐ ⊘	The subject site is in Area 2 (Map of BPA). Public road access, with all-weather surfaces, is (or can and will be) provided in two different directions, to at least two different suitable destinations.
☐ ☐ ⊘	The subject site is in Area 2 (Map of BPA). Public road access, with all-weather surfaces, is (or can and will be) only provided in one direction to a single suitable destination. The Guidelines establish this as an acceptable solution when: • It is demonstrated that secondary access (including an emergency access way), cannot be provided due to site constraints; and • The proposed day use site is located within a residential built out area.

☐ ☐ ⊘ The subject site is in Area 2 (Map of BPA). Public road access, with all-weather surfaces, is (or can and will be) only provided in one direction to a single suitable destination.

The Guidelines establish this as an acceptable solution when:

- It is demonstrated that secondary access (including an emergency access way), cannot be provided due to site constraints; and
- The required Bushfire Emergency Plan (BEP) provides for:
    - Closure during days forecasted to be an extreme or catastrophic fire danger rating and/or days a total fire ban is declared; and
    - The early evacuation of patrons and staff.

☐ ☐ ⊘ The subject site is in Area 2 (Map of BPA). Public road access, with all-weather surfaces, is (or can and will be) only provided in one direction to a single suitable destination.

The Guidelines establish this as an acceptable solution when:

- It is demonstrated that secondary access (including an emergency access way), cannot be provided due to site constraints; and
- The required Bushfire Emergency Plan (BEP) provides for non-operation during the bushfire season.

Assessment Supporting Details: None required.

A3.3a No-Through Roads	Applicable:	Yes	Compliant:	No

☐ ☐ ⊘ A3.3a is not applicable to the subject planning proposal because the subject site is in Area 1 (Urban) (Map of BPA), for which there is no limitation on no-through road lengths.

☐ ☐ ⊘ The subject site is in Area 2 (Map of BPA) but A3.3a is not applicable to the subject planning proposal because access to the subject site is via a private driveway from a public road providing two-way access.

Consequently, vehicular access to the subject site does not have a no-through road component.

☐ ☐ ⊘ The subject site is in Area 2 (Map of BPA) but A3.3a is not applicable to the subject planning proposal as the proposal can satisfy the two-way access exception conditions established by A3.2b as the applicable acceptable solution for a day use that will not provide any overnight accommodation (refer to the A3.2b assessment).

Compliant access applying acceptable solution A3.2b as the relevant and overriding solution, can be via a single public road, of any length, to a single suitable destination. Consequently, the requirement for consideration of the length of a no-through road and the availability of an "intersection within 200 metres of the subject lot boundary from which two-way access is available", cannot logically be relevant to the subject proposal.

Note To Decision Makers

Regarding A3.2b potentially negating the requirement to apply 3.3a. DPLH officer level advice has been received by BPP stating their agreement with the above interpretation of the applicable acceptable solutions and that consideration of the relative level of risk for the different use scenarios is incorporated into those acceptable solutions.

The intended risk outcome is to ensure that the residual level of risk to 'vulnerable' persons can be considered as equally acceptable or tolerable for both compliant overnight stay and day use only scenarios.

The application of this approach is identified in the DPLH SPP 3.7 Explanatory Note (25/11/2024), Part 3 where it is identified risk levels are being considered "… specific bushfire protection criteria for day uses …

	have been introduced. This acknowledges the lesser risk and increased opportunities for businesses approved for development to close on days with an extreme or catastrophic fire danger rating."
☐ ☐ ⊘	The subject site is in Area 2 (Map of BPA); Access to the subject site is via a no-through public road that does not exceed the established maximum of 200 metres in length from the subject site boundary to an intersection where two-way access is provided.
☑ ☐ ☐	The subject site is in Area 2 (Map of BPA): Access to the subject site / lot(s) is via a no-through public road that exceeds the established maximum of 200 metres in length from the proposed lot(s) boundary to an intersection where two-way access is provided. It is demonstrated that there are site constraints and/or that there are no alternative design options to achieve the 200 metre maximum length. Compliant two-way access within 200 metres from the proposed lot(s) boundary will be established through the provision (or existence) of a compliant emergency access way through the application of acceptable solution A3.4: Emergency Access Way.
☐ ☒ ☐	The subject site is in Area 2 (Map of BPA); Access to the subject site is via a no-through public road that exceeds the established maximum of 200 metres in length from the proposed lot(s) boundary to an intersection where two-way access is provided. However, the additional road length can be considered to satisfy the acceptable solution as the following three established requirements can be met:
☐ ☒ ☐	1. It is demonstrated that that an alternative access, including an emergency access way, cannot be provided due to site constraints; and
☐ ☒ ☐	2. The no-through road travels towards a suitable destination; and
☐ ☒ ☐	3. The balance of the no-through road that is greater than 200 metres from the subject site is: • Wholly within a residential built-out area; or • Wholly within an area designated Area 1 (Urban) on Map of BPA; or • Potentially subject to radiant heat levels from adjacent bushfire prone vegetation not exceeding 12.5 kW/m^2 / BAL-LOW (Guidelines Figure 29).

Assessment Supporting Details: The no-through road is 436 metres in length and has an Extreme Bushfire Hazard Level. Compliance is shown through Outcomes-based assessment in Section 5.4.

A3.3b No-through roads technical requirements	Applicable:	Yes	Compliant:	No

☐ ☐ ⊘	A3.3b is not applicable to the subject planning proposal because the assessment against A3.3a has established that vehicular access to the site does not have a no-through road component.
☑ ☐ ☐	The no-through road meets (or can and will meet) the public road technical requirements for minimum vertical clearance (4.5 metres) and minimum weight capacity (15 tonnes - includes bridges, culverts).
☑ ☐ ☐	The no-through road meets (or can and will meet) the public road technical requirement recommended in the Guidelines in Appendix B3, B3.1 for a minimum horizontal clearance of 6 metres.
☑ ☐ ☐	The no-through road (i.e. public road) technical requirements for minimum horizontal clearance (excluding perimeter road), gradients and curves should be in accordance with the class of road as specified in the Public Works Engineering Australasia (IPWEA) subdivision guidelines, Liveable

	Neighbourhoods, Austroads Standards, any applicable or relevant Main Roads standards, supplements, policies and any applicable or relevant local government standards or policies. The assessment conducted for the bushfire management plan indicates that it is likely that the proposed development can and will comply with the requirements. However, the applicable class of road, the associated technical requirements and subsequent proposal compliance, will need to be confirmed with the relevant local government and/or Main Roads WA.
☐ ☒ ☐	The turnaround area/head meets (or can and will meet) the design requirements established by the Guidelines, Figure 30.

Assessment Supporting Details: There is no compliant turnaround at the end of Horse Hill Road; however, compliant turnarounds are provided within the subject site via internal accessways (private driveway). This variation from the acceptable solution is addressed through an outcomes-based assessment in Section 5.4.

A3.4 Emergency access way	Applicable:	Yes	Compliant:	No

☐ ☐ ⊘	A3.4 is not applicable to the subject planning proposal because it has been assessed as compliant with A3.2a and 3.2b (and A3.3a and A3.3b when applicable), and an emergency access way is not required.
☐ ☐ ⊘	A3.4 is applicable to the subject planning proposal because an emergency access way currently exists and has been part of the subject planning proposal's ability to comply with A3.2a. Consequently, it will apply with regard to meeting (or being able to meet), the specified technical requirements and ongoing management requirements, rather than its installation.
☑ ☐ ☐	The requirements established for acceptable no-through road access to the subject site in A3.2 and A3.3 cannot be achieved. An emergency access way (EAW) is provided as the alternative access and can be considered as an acceptable solution, when the following established requirements are met:
☑ ☐ ☐	• It is demonstrated that site constraints prevent the requirements of A3.2 and A3.3 being met; and
☐ ☒ ☐	• The access way is no more than 500 metres in length, provides a through connection to a public road connecting to a public road network; and
☐ ☒ ☐	• The access way meets the technical requirements (Guidelines Appendix B3, Table 10) for minimum horizontal clearance (Map of BPA Area 1 (Urban) = 6 metres and Area 2 = 10 metres), minimum vertical clearance (4.5 metres), minimum weight capacity (15 tonnes - includes bridges, culverts) and minimum inner radius of road curves (8.5 metres); and
☑ ☐ ☐	• The access way meets the technical requirements (Guidelines Appendix B3, Table 10) for crossfalls and gradients for different surfaces and dips; and
☑ ☐ ☐	• The access way will be signposted and, if gated, gates will open for the whole carriageway width and remain unlocked; and
☐ ☒ ☐	• The proponent has obtained consent from the local government, that it will accept care, control and management responsibilities for the emergency access way.

Assessment Supporting Details:

An alternative emergency accessway is proposed. Site constraints limit the provision of an emergency accessway that fully complies with the acceptable solutions; however, the proposed accessway will be available for use by emergency services and patrons and meets the intent of the Guidelines by providing safe through-access.

The accessway will not be maintained by the local government and will instead be the responsibility of the landowner. This variation is addressed in detail through an outcomes-based assessment in Section 5.4.

The emergency accessway exceeds 500 m in length and does not achieve the minimum horizontal clearance requirements in order to avoid unnecessary clearing of native vegetation; instead, it will comply with the driveway requirements.

A3.5 Onsite shelter	Applicable:	Yes	Compliant:	No

☐ ☐ ⊘	A3.5 is not applicable to the subject planning proposal because the proposal has been assessed as compliant with the relevant part of A3.2, A3.3 (if applicable) and A3.4 (if required), providing two-way access and an onsite shelter is not required.
☐ ☐ ⊘	The proposed development has a capacity of up to a maximum of 50 guests and employees at any one time and the requirement for compliant two-way access cannot be achieved. Consequently, an onsite shelter will be provided in accordance with A2.5.
☐ ☐ ⊘	The proposed development has a capacity of up to a maximum of 50 guests and employees at any one time and the requirement for compliant two-way access cannot be achieved and the bushfire practitioner considers an onsite shelter not necessary. An outcomes-based approach may be prepared to determine the level of relevant risks to persons and property and whether adequate protection measures can be implemented to result in an acceptable or tolerable level of residual risk.
☑ ☐ ☐	The proposed development has a capacity greater than 100 guests and employees at any one time, the requirement for compliant two-way access cannot be achieved and/or the bushfire practitioner considers an onsite shelter not necessary. An outcomes-based approach may be prepared to determine the level of relevant risks to persons and property and whether adequate protection measures can be implemented to result in an acceptable or tolerable level of residual risk.

Assessment Supporting Details: The BPP identifies an onsite shelter as necessary for the site; however, the number of guests and employees may exceed 100 at any one time. Accordingly, an outcomes-based approach has been prepared to demonstrate how the proposal meets the intent of the acceptable solution.

A3.6 Fire service access route	Applicable:	Yes	Compliant:	Yes

Note To Decision Makers

DPLH officer level advice has been received by BPP (email 18 November 2024) stating that this acceptable solution is applicable to a development application planning proposal when "it is necessary and serves a purpose" i.e. contributes meaningfully to mitigating risks associated with a bushfire event.

The DPLH response indicates a flexibility with the application of this acceptable solution that typically does not exist with other acceptable solutions for development applications (other than access route signage).

Consequently, what should apply as suitable firefighter access, in the opinion of the bushfire consultant, is presented as part of this acceptable solution assessment and there is no need to apply an outcomes-based assessment.

Note the following that have also been considered in determining this approach:

- *The wording of this acceptable solution (Guidelines BPC 8 A3.6) includes "Where proposed lots adjoin classified vegetation". This is better aligned with application to subdivision proposals than a single existing lot and a development application;*
- *The Guidelines explanatory note B3.6 establishes that the fire service access route (FSAR) "can be provided as either an easement in gross over private or Crown land or ceded to the Crown as a reserve. In both approaches management of the FSAR is by the local government as the grantee of the easement or management body of the reserve".*

  This explanation indicates the application of this acceptable solution is better aligned with its application to subdivision proposals than a development application involving a single existing lot; and
- *The management and technical requirements for a FSAR are likely to be impractical and/or excessive for development on the majority of individual lots.*

Where the bushfire consultant's assessment establishes that suitable firefighter access to adjoining classified vegetation (excluding Class G Grassland) is "necessary and serves a purpose", this assessment will identify that the acceptable solution is applicable and the appropriate requirements. The following is considered:

- *If suitable firefighter access is required and currently exists or not;*
- *If suitable firefighter access is required and does not currently exist, the necessary physical requirements must give due regard to the use and scale of proposed development, the size of the lot and the identified bushfire hazard threat levels; and*
- *When is it appropriate to establish firefighter access that complies with the technical requirements for a FSAR (Guidelines Table 10).*

☐ ☐ ⊘ A3.6 is not applicable to the subject planning proposal because the subject lot(s) do not adjoin classified vegetation or only adjoin Class G Grassland (classified under AS 3959).

☑ ☐ ☐ A3.6 is not applicable to the subject planning proposal because the provision of suitable firefighter access within or external to the subject lot(s) is not necessary and would serve no purpose. It is not a practical response to any identified bushfire hazard associated with the subject planning proposal.

☑ ☐ ☐ The subject lot(s) adjoin classified vegetation that is not Class G Grassland (classified under AS 3959). Suitable firefighter access, in the opinion of the bushfire consultant, is considered 'necessary and serves a purpose'.

Suitable firefighter access to the classified vegetation is currently available. This firefighter access achieves the intent of the acceptable solution but applies a more pragmatic design than that established by the FSAR technical requirements and is aligned with the specifics of the planning proposal's site and use.

The requirements for maintenance of the defined firefighter access are referenced in the landowner responsibility checklists of this BMP.

☐ ☐ ⊘ The subject lot(s) adjoin classified vegetation that is not Class G Grassland (classified under AS 3959). Suitable firefighter access, in the opinion of the bushfire consultant, is considered 'necessary and serves a purpose'.

Suitable firefighter access to the classified vegetation is currently not available.

The physical requirements of the suitable firefighter access are established by the bushfire consultant within the assessment supporting details below (these will align at a minimum with typical 'firebreak' requirements when installed for firefighter access).

This firefighter access achieves the intent of the acceptable solution but applies a more pragmatic design than that established by the FSAR technical requirements and aligned with the specifics of the planning proposal's site and use.

The requirements for implementation and maintenance of the firefighter access are referenced in the landowner responsibility checklists of this BMP.

☐ ☐ ⊘	The subject lot(s) adjoin classified vegetation that is not Class G Grassland (classified under AS 3959). A fire service access route is to be provided for firefighter access to this vegetation. It can and will meet the following established requirements:
☐ ☐ ⊘	• The fire service access route is a through-route with no dead-ends, no further than 500 metres from a public road and will be signposted; and
☐ ☐ ⊘	• The fire service access route meets (or can and will meet) the technical requirements (Guidelines Appendix B3, Table 10) for minimum horizontal clearance (Map of BPA Area 1 (Urban) = 6 metres and Area 2 = 10 metres), minimum vertical clearance (4.5 metres), minimum weight capacity (15 tonnes - includes bridges, culverts) and minimum inner radius of road curves (8.5 metres); and
☐ ☐ ⊘	• The fire service access route meets (or can and will meet) the technical requirements (Guidelines Appendix B3, Table 10) for crossfalls and gradients for different surfaces and dips; and
☐ ☐ ⊘	• When gated, gates will open the whole carriageway width and can be locked by the local government and/or the emergency services, when keys are provided for each gate; and
☐ ☐ ⊘	• The proponent has obtained consent from the local government, that it will accept care, control and management responsibilities for the fire service access route (unless it is a Crown reserve managed by another entity).

Assessment Supporting Details:

Access to the classified vegetation is provided via the existing firebreaks and the existing and proposed internal driveway and accessway network. These access routes provide sufficient and continuous access for ongoing land management and emergency response purposes. On this basis, no additional access tracks, Fire Service Access Route, or vegetation clearing are considered necessary, as the existing and proposed vehicular access adequately meets the intent of the relevant access and management requirements.

A3.7 Internal vehicular access and private driveways	Applicable:	Yes	Compliant:	Yes

☐ ☐ ⊘	A3.7 is not applicable to the subject planning proposal because the proposal does not contain internal vehicular access and private driveways longer than 70 metres.
☑ ☐ ☐	There are internal vehicular access and private driveways longer than 70 metres and the subject site meets (or can and will meet) all the following established requirements:
☑ ☐ ☐	• The private driveway meets (or can and will meet) the technical requirements (Guidelines Appendix B3, Table 10) for minimum horizontal clearance (6 metres) or where not required to comply with the Guidelines width, it meets the requirements of the Residential Design Codes and Development Control Policy 2.2 Residential Subdivision; and
☑ ☐ ☐	• The private driveway meets (or can and will meet) the technical requirements (Guidelines Appendix B3, Table 10) for minimum vertical clearance (4.5 metres), minimum weight capacity (15 tonnes - includes bridges, culverts) and minimum inner radius of road curves (8.5 metres); and
☑ ☐ ☐	• The private driveway meets (or can and will meet) the technical requirements (Guidelines Appendix B3, Table 10) for the gradients of different surfaces and dips; and

☑ ☐ ☐	• Passing bays are (or can and will be) installed every 200 metres with a minimum length of 20 metres and a minimum additional carriageway width of 2 metres i.e. the combined carriageway width of the passing bay and constructed private driveway will be a minimum 6 metres; and
☑ ☐ ☐	• The turnaround area/head meets (or can and will meet) the design and location (within 30m of main habitable building) requirements established by the Guidelines (refer to Figures 30 and 38).

Assessment Supporting Details: All internal accessways and driveways will me the driveway standards listed in this BMP.

A3.8 Signage	Applicable:	Yes	Compliant:	Yes

Note To Decision Makers

DPLH officer level advice has been received by BPP (email 18 November 2024) stating that this acceptable solution is applicable to a development application planning proposal when "it is necessary and serves a purpose" i.e. contributes meaningfully to mitigating risks associated with a bushfire event.

The DPLH response indicates a flexibility with the application of this acceptable solution that typically does not exist with other acceptable solutions for development applications (other than a fire service access route).

There are development application situations where this acceptable solution is unlikely to serve a purpose and would not contribute meaningfully to the reduction of bushfire risk.

This is likely to be the case for situations which have attributes such as; relatively small lot size, no or limited length no-through roads, good public road access network (surfaces, widths, gradients, visibility, connectivity etc), multiple suitable destinations easily, good road signage or in a built out areas or situations where persons are likely to be familiar with their surrounds.

Consequently, should the described signage requirements of the acceptable solution, in the opinion of the bushfire consultant, serve no purpose – justification for this position is presented as part of this acceptable solution assessment and there is no need to apply an outcomes-based assessment.

☐ ☐ ⊘	A3.8 is not applicable to the subject planning proposal because the provision of signage is, in the opinion of the bushfire consultant, not necessary and would serve no purpose. Signage would not meaningfully contribute to mitigating risks associated with a bushfire event, for the subject proposal.
☑ ☐ ☐	Signage can and will be provided within the subject site, advising of where each access route travels to and the distance and general information on what to do in the event of a bushfire.

Assessment Supporting Details:

A Bushfire Emergency Plan will be prepared for the proposed development. The plan will include all required signage, including evacuation maps, which will be displayed within the eco-tents.

Additional signage will be provided along accessways to indicate direction, length, and destination. A site map will also be installed at the entrance to the development to assist with guest orientation and allow visitors to familiarise themselves with the venue.

5.3.3 Element 4: Water Supply

ELEMENT 4: WATER SUPPLY (DEVELOPMENT –VULNERABLE TOURISM LAND USES AND DAY USES)	
All details of acceptable solution requirements are established in the Planning for Bushfire Guidelines (Guidelines) – WA Department of Planning, Lands and Heritage (DPLH, as amended). When relevant, the 'Bushfire Management Plan Guidance for the Dampier Peninsula' (DPLH, 2021 Rev B), is also referenced.	
O4	**The Outcome of State Planning Policy 3.7 Bushfire (and the BPC) to be Achieved**
	Ensure that sufficient water is available and accessible for emergency services, to enable people, property and infrastructure to be defended from bushfire. (SPP 3.7, 6.4)
E4	Acceptable Solutions Pathway - Compliance Statement
	The planning proposal is fully compliant with all applicable acceptable solutions and therefore achieves the required outcomes of this element.
	Alternative Pathway Applied to Demonstrate Ability to Achieve SPP 3.7 Outcomes
	N/A

ACCEPTABLE SOLUTIONS - ASSESSMENT STATEMENTS				
Check Box Legend:	☑ Relevant & met	☒ Relevant & not met	⃠ Not relevant	
A4.1 Water supply	Applicable:	Yes	Compliant:	Yes

☐ ☐ ⃠	Evidence is provided that a reticulated water supply, available for firefighting purposes, exists or can be provided. Hydrant connection(s) will be provided in accordance with the specifications established by the relevant water supply authority (refer also to hydrant location information in Appendix D of this BMP).
☑ ☐ ☐	The provision of or the specifications of a reticulated water supply cannot be met. Evidence is provided that a sufficient, sustainable and accessible non-reticulated water supply, dedicated to firefighting purposes, can and will be provided in accordance with the specifications established in the Guidelines, Appendix B4: Water Supply:
☐ ☐ ⃠	• The planning proposal is for a vulnerable land use development (not camping ground). For each habitable building a water supply, dedicated to firefighting purposes, will be stored in tanks at 10,000 litres of water per 500 m^2 of floor area up to 50,000 litres in total; and
☑ ☐ ☐	• The planning proposal is for a 'camping ground' vulnerable land use development. The required water supply dedicated to firefighting purposes is to be determined at the discretion of the local government and this will be complied with. Evidence is provided of the determined requirements and is presented as an Addendum in this BMP; and
☑ ☐ ☐	• The above ground water supply tank(s), dedicated to firefighting purposes (and tank stand(s) when applicable), will be constructed of non-combustible material and as necessary, will comply with AS/NZS 3500.1(as amended). This includes not using the same water supply for both domestic use and firefighting purposes. If a combined use tank(s) is to be used, it will separate the storage compartments in accordance with the provisions of the standard (i.e. internal installation of double partition walls); and
☑ ☐ ☐	• The outlet connection fitting for the water supply tank(s), dedicated to firefighting purposes, will have a full flow valve and a 50 mm male camlock coupling; and

☑ ☐ ☐	• All above-ground, exposed water supply pipes and fittings will be metal and positioned facing away from the source of bushfire hazard and/or shielded against potential bushfire impact – to allow access by emergency services; and
☑ ☐ ☐	• The planned provision of the water supply tank(s) will consider locations relative to the bushfire hazard. Location of the tank(s) and management of vegetation will ensure vegetation will not exist over or against the tank(s) and that sufficient separation exists to limit the potential bushfire impact. Due consideration will also be given to the provision of sufficient separation from vegetation and/or shielding for the protection of firefighters accessing the water supply; and
☑ ☐ ☐	• An unobstructed, hardened ground surface, for emergency services vehicle access, can and will be installed within 4 metres of the water supply outlet (refer to Figure 39, Guidelines); and
☑ ☐ ☐	• It is proposed for a water supply tank outlet(s) is to be remote from the tank, the local government and DFES will have been consulted regarding the application and location. The determined requirements are presented as an Addendum in this BMP.
☐ ☐ ⊘	Planned below ground water supply tank(s), dedicated to firefighting purposes, will have at least a 200 mm diameter access hole – or a suitable inspection opening - to allow tankers or emergency services vehicles to refill direct from the tank, with the outlet location clearly marked on the surface. As necessary, the tanks(s) will comply with AS/NZS 3500.1 (as amended).
☐ ☐ ⊘	The planning proposal intends that a suitable static water supply is to be provided by a dam or river that complies with the DFES guidelines for acceptable sources of water for firefighting purposes. Evidence is provided that: • Demonstrates that the water level will be maintained above the top of the highest fire brigade suction point; and • Approval has been obtained from the decision maker in consultation with the emergency services and is presented as an Addendum in this BMP.
☐ ☐ ⊘	The BPC Explanatory Notes in Appendix B.4: Water Supply introduce additional measures as best practice but voluntary. The following measure is adopted by the planning proposal: The subject site is in a non-reticulated area. Pumping equipment is installed and will be powered by means other than the electricity network such as an appropriately powered and capacity petrol/diesel or onsite generator/electricity, driven pump, and be shielded against potential bushfire impact.
☐ ☐ ⊘	The BPC Explanatory Notes in Appendix B.4: Water Supply introduce additional measure as best practice but voluntary. The following measure is adopted by the planning proposal: The subject site will have a reticulated water supply but is in an area designated as Area 2 on the Map of BPA and/or the local government area has known issues with water supply or pressure. Water supply tank(s) and fittings dedicated to firefighting purposes (noting that combining drinking and firefighting uses of water is not recommended and may be contrary to relevant provisions), that satisfy the construction and design requirements established in the Guidelines, Appendix B4: Water Supply, will be provided.
☐ ☐ ⊘	The BPC Explanatory Notes in Appendix B.4: Water Supply introduce additional measure as best practice but voluntary. The following measure is adopted by the planning proposal: The subject site is serviced by reticulated water. However, the distance from the public road (along which the fire hydrant is located) to the farthest part of the habitable building is greater than 70 metres, exceeding the reach of a hose reel. A water supply tank will be installed within the lot.

Assessment Supporting Details:

The subject sire is not serviced by a reticulated water supply. A static firefighting water supply tank is required to be installed on the lot to service the proposed development (combined water supply for eco-tents and ceremonies/reception building). Its proposed location is shown on Figure 1.2.

The Guidelines recommend a volume of 10, 000L per habitable building for a development application. Therefore, the bushfire consultant recommends 100 000L firefighting water supply for the 10 eco-tents, or to a volume as agreed by the decision maker. An additional 10, 000L will be required for the Tourism Day Use (Ceremonies/Reception Building).

All technical requirements for static water supply as per Appendix D must be complied with (including non-combustible tank (s) and fittings to appropriate specifications).

5.4 Applying the Outcomes-Based Approach (OBA)

EXPLANATORY INFORMATION

Note: This section is included in the BMP because the assessment against the relevant bushfire protection criteria acceptable solutions (in the preceding Section 5.3), has determined that full compliance with all relevant acceptable solutions cannot be achieved for the subject planning proposal.

For decision maker consideration, an assessment applying the expert opinion of the bushfire consultant is applied to demonstrate how the subject planning proposal may satisfy the policy outcomes of State Planning Policy 3.7 Bushfire (SPP 3.7) and restated in the Bushfire Protection Criteria (BPC)..

The Alternative Pathway to Demonstrate Compliance

Clause 7.5 of SPP 3.7 establishes the ability to apply an outcomes-based approach. It "recognises that some sites are unable to fully comply with the acceptable solutions of the Guidelines due to complex site characteristics and/or environmental values, but through the use of innovative, alternative bushfire risk management measures may be able to satisfy the outcomes of this policy."

The Outcomes-Based Approach

The approach involves the development of a justifiable merit based case by the bushfire consultant, to assist and inform the decision-maker in making their discretionary decision.

This may include, as necessary, assessing the residual level of relevant risks associated with a bushfire event, post the application of required and recommended bushfire protection measures.

Also, the following guidance is incorporated into the relevant assessments conducted in this section of the BMP as necessary and applicable:

1. Clause 7.5 of SPP 3.7 establishes that in conducting an outcomes-based approach, an assessment is to be undertaken in accordance with the stated criteria, referenced as criterion (a) to (g).
2. Appendix B (Guidelines) provides the following additional guidance for undertaking an outcomes-based approach for specific components of the bushfire protection criteria:
    (a) Element 1: Location (Appendix B1.2)
    (b) Element 3: Vehicular Access – No-through roads - length (Appendix B3.3.1)
    (c) Element 3: Vehicular Access – Emergency access way – width and/or length (Appendix B3.4.1)

Establishment of Additional Bushfire Protection measures

Any additional bushfire protection measures developed applying the alternative pathway will also be stated in:

- Section 5.5 'Required Additional Bushfire Protection Measures' and therefore also in Section 6 'Responsibility Checklists' - when essential to the outcomes-based assessment outcome; and/or
- Section 5.6 'Recommended Additional Bushfire Protection Measures' – as consultant suggestions to be considered for implementation by the proponent.

5.4.1 Assessment Against the SPP 3.7 Outcomes-Based Approach (OBA) Criteria

The following assessment against the OBA Criteria is conducted in accordance with SPP 3.7 cl. 7.5 and the Guidelines Part 2.2.1(b).

When additional detailed assessment demonstrating the proposal's ability to achieve SPP 3.7 Policy Outcomes have been developed - and presented elsewhere in the BMP - the data is referenced, and the summary information is included below.

5.4.1.1 OBA Criterion A

The BMP is to address the acceptable solutions to the greatest extent possible.

ASSESSMENT DETAIL

For the subject planning proposal, the detailed assessment against each relevant element and each corresponding relevant acceptable solution is presented in Section 5.4. The assessment result is summarised in Section 5.2.

5.4.1.2 OBA Criterion B

The BMP is to identify any non-compliance with the relevant acceptable solutions and why compliance cannot be achieved.

ASSESSMENT DETAIL

For the subject planning proposal, the detailed assessment that identifies the non-compliance against any relevant acceptable solution is presented in Section 5.4.

Identification of those relevant acceptable solutions for which compliance is not achieved is presented in the following table, along with a summary of why compliance cannot be achieved.

DEVELOPMENT – CLASS 9 VULNERABLE USE BUILDINGS THE RELEVANT ACCEPTABLE SOLUTIONS THAT CANNOT BE FULLY COMPLIED WITH	
The Bushfire Protection Criteria (BPC) Elements and Acceptable Solutions	Reasons for Inability to Achieve Compliance
E3: VEHICULAR ACCESS	
A3.2a Access routes	The proposal is located on an ewxisting no-through road (Horse Hill Road) that terminates at the subject site. As a result, the site is served by a single access and egress route via Horse Hill Road. This road provides the only viable evacuation and access pathway, leading north toward Bremer Bay Town. The access to the south terminates at the coastline, where access is not suitable for vehicular evacuation or emergency response. Consequently, there is only one practical direction of travel available for site access, egress, and emergency evacuation.
A3.3a No-through roads	Horse Hill Road is a dead end road terminating at the subject sire. A single access/egress route is available to Point Henry Road where two-way access is available. This is only to one suitable destination. The no-through road is >200m from the closest point on the lot to a point of two-way access.
A3.3b No-through roads technical requirements	There is no compliant turnaround at the end of Horse Hill Road; however, compliant turnarounds are provided within the subject site via internal accessways (private driveway).

A3.4 Emergency access way	Site constraints limit the provision of an emergency accessway that fully complies with the acceptable solutions.
A3.5 Onsite shelter	The number of guests and employees may exceed 100 at any one time.

5.4.1.3 OBA Criterion C

Detail how the design addresses bushfire risk and where additional bushfire risk management measures have been deemed necessary and included to minimise the risk.

ASSESSMENT DETAIL

The proposed buildings can achieve a radiant heat impact of ≤29 kW/m^2 aside from the eco-tents which have been considered as tolerable loss and will have a 3-metre low fuel area around the tents.

As a precaution, we propose both and onsite shelter as well as closure of overnight stays and the wedding venue on days with FBI of 75 or above, and multiple evacuation routes via the the EAW are provided.

EXPLANATORY NOTES - REDUCED WIDTH EMERGENCY ACCESS WAY

The Guidelines Appendix B "Explanatory Notes', B3.4.1 establishes:

- That "an outcomes-based approach may be used to demonstrate to the satisfaction of the decision-maker that a reduction in the width and/or an extension of the length of the emergency access way (EAW) provides for the efficient and effective evacuation to a suitable destination(s); and
- Provides diagrammatic examples (Figures 32 and 33) of when EAW width could potentially be reduced (from 10m to no less than 6m), due to:
    - classified vegetation only existing adjacent or adjoining one side of the EAW:
    - developed lots on one or both sides that are either non-vegetated or are maintained in a low bushfire threat state.

The following factors have been applied to determining that the reduction in width of the emergency access way provides for efficient and effective evacuation to a suitable destination(s).

The proposed Emergency Accessway Route (EAW) has been reduced in width and constructed to driveway standards in response to site constraints and to minimise environmental impact; however, it continues to meet the intent of an emergency accessway as outlined in the relevant guidelines.

The EAW will provide continuous through-access for emergency vehicles and patrons between key areas of the site, enabling safe movement during an emergency event. While the route does not achieve the full dimensional requirements of the acceptable solution, it remains fit for purpose and functional for its intended use. The accessway will be managed and maintained by the landowner, ensuring it remains available and serviceable at all times.

Importantly, the full extent and width of a standard emergency accessway is not required in this instance, as the route does not service other properties or the broader public road network. Its function is limited to providing access for patrons and emergency services associated with the facility only, including access to the onsite shelter. Accordingly, the reduced EAW achieves an appropriate level of safety relative to the scale and use of the development.

Additional bushfire protection measures further support the acceptability of the reduced EAW. These include the provision of an onsite shelter and an operational management commitment to close the facility on days where the Fire Behaviour Index (FBI) exceeds 75, thereby significantly reducing exposure to bushfire risk during periods of elevated fire danger.

The reduced width of the EAW is also justified on environmental grounds. Providing the full 10 m width would require unnecessary clearing of native vegetation, which is not considered proportionate or required to achieve the intended emergency access outcomes. By adopting driveway standards, the proposal balances bushfire safety requirements with environmental protection objectives while still achieving safe and effective emergency access.

On this basis, the proposed reduced Emergency Accessway Route is considered acceptable and consistent with an outcomes-based approach, as it meets the intent of the emergency accessway provisions without resulting in unnecessary environmental impact or increased risk to life or property.

5.4.1.4 OBA Criterion D

Detail if there are any community net-benefits. Note these are benefits resulting from:

- **The additional management of bushfire risk (i.e. those risks to persons, property and infrastructure that are associated with a bushfire event), due to the implementation of bushfire protection measures associated with the subject planning proposal that otherwise would be unlikely to exist; and/or**
- **Environmental benefits.**

ASSESSMENT DETAIL

Bushfire Protection Measure	Assessment Detail – Net Community Benefits
Provision of additional emergency access ways or fire service access routes facilitating improved access, to and within the site or locality.	An additional proposed emergency access way that will allow improved access for emergency services during a fire and improve overall community safety by providing further access to classified vegetation.
Provision of additional strategic or private water supply tanks.	An additional water supply available to be used for firefighting which can help in the reducing the spread of the fire in the overall area.
A reduction in bushfire prone vegetation within the development site that reduces the potential bushfire impact on adjoining elements at risk.	The installation of Asset Protection Zones around proposed buildings will reduce the extent of bushfire prone vegetation.

5.4.1.5 OBA Criterion E

Include any fire engineering solutions or written evidence such as publications and State Administrative Tribunal decisions to support the proposal (where available).

ASSESSMENT DETAIL

Not applicable to the subject planning proposal.

5.4.1.6 OBA Criterion F

Outline how the SPP 3.7 policy outcomes have been achieved.

ASSESSMENT DETAIL

The SPP 3.7 Policy Outcome Not Satisfied by the Deemed to Comply Pathway (Acceptable Solutions)	Assessment Detail - How the Policy Outcome is Achieved (as the expert opinion of the bushfire planning practitioner)
SPP 3.7, 6.3: Ensure the design and capacity of vehicular access and egress provide: • For efficient and effective evacuation to a suitable destination(s); and/or	The subject site is located within a rural setting and is currently served by a single access and egress route. The lot is situated at the end of Horse Hill Road, a no-through road exceeding 200 m in length, which presents inherent access constraints during emergency events. Both Horse Hill Road and the proposed Emergency Accessway (EAW),

• As a contingency measure for vulnerable land uses, an on-site shelter, where demonstrated appropriate, as a last resort option.	which connects to Magpie Rise, ultimately rely on Henry Road as their closest point of two-way access. Henry Road provides access and egress in only one suitable direction, being north toward Bremer Bay townsite. Access to the south is limited, as the road network terminates at coastal beaches and does not provide a viable evacuation route. As a result, the surrounding road network offers constrained evacuation options, further reinforcing the importance of internal site-based emergency measures. To address these limitations, an alternative EAW is proposed between the end of Horse Hill Road and Magpie Rise. The EAW is intended to provide an additional internal egress option for emergency vehicles and patrons in circumstances where evacuation via Horse Hill Road is not safe or feasible. Due to site-specific constraints, including vegetation retention and topography, the EAW cannot fully comply with the dimensional standards of the current guidelines; however, it will be constructed to driveway standards and will provide functional through-access, thereby meeting the intent of the emergency accessway provisions. Given the vulnerable nature of the proposed land use and the constrained external road network, an onsite shelter is proposed as a contingency and last-resort bushfire protection measure. The shelter will be designed to accommodate more than 100 people and is therefore addressed through an outcomes-based assessment to demonstrate compliance with the intent of the acceptable solutions. Additional bushfire protection measures are also proposed to further reduce risk and occupant exposure. These include an operational management commitment to close the facility on days of elevated fire danger, specifically when the Fire Behaviour Index (FBI) exceeds 75. This measure significantly limits the number of patrons onsite during periods of heightened bushfire risk and provides an added layer of protection in recognition of the site and network constraints that prevent full compliance with all acceptable solutions under the BPC. Collectively, the provision of a reduced but functional EAW, an onsite shelter, and operational controls demonstrates a layered, risk-based approach to bushfire management that appropriately responds to the site's constraints while achieving the overarching objectives of life safety, emergency access, and risk minimisation.

5.4.1.7 OBA Criterion G

Outline why approval is warranted by the decision-maker in this instance.

ASSESSMENT DETAIL

Approval of the proposal is warranted as the development meets the intent and objectives of the relevant policy and guideline framework, notwithstanding minor variations from acceptable solutions.

The proposal has been designed in response to genuine site constraints, including existing vegetation, topography, and established access arrangements. Where strict compliance with acceptable solutions cannot be achieved, an outcomes-based approach has been applied to demonstrate that the development achieves an equivalent or improved level of safety, functionality, and environmental protection.

Importantly, the proposal provides adequate access for emergency services through a combination of internal accessways, compliant turnarounds, and an alternative emergency access route that enables safe and effective movement throughout the site. These measures collectively ensure that emergency response objectives are met without requiring unnecessary clearing of native vegetation.

The development also incorporates multiple layers of bushfire risk mitigation, including managed access to classified vegetation, clear responsibility for ongoing maintenance by the landowner, and the provision of onsite shelter arrangements consistent with the intent of the BMP. In addition, the proposal includes an operational management measure whereby the site will be closed to patrons on days of elevated bushfire risk, specifically during high Fire Behaviour Index (FBI) conditions. This provides an additional level of protection by reducing occupant exposure during periods of heightened fire danger.

In BPP's opinion, the proposal, including the additional bushfire mitigation measures incorporated, fulfils the requirements of State Planning Policy 3.7.

5.4.2 Bushfire Risk – Consideration of Vehicular Access Safe Use Attributes

EXPLANATORY INFORMATION – CONSIDERATION OF BUSHFIRE RISK

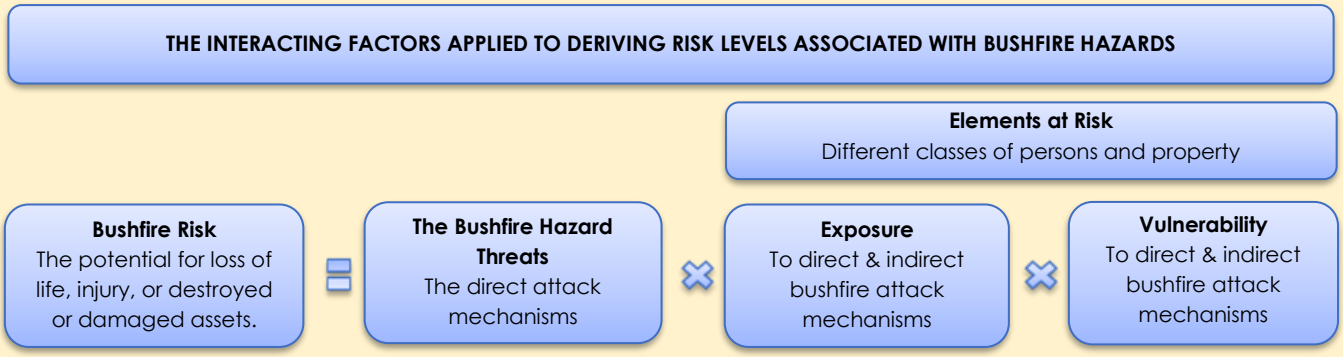
Bushfire Risk – The Relevant Risks: The range of relevant risks associated with this natural hazard event are commonly referred to as 'bushfire risk'. For this assessment the relevant bushfire risks are the potential for injury and/or death of persons traversing vehicular access routes.

The Intent of State Planning Policy 3.7 Bushfire: To implement effective, risk-based land use planning and development which in the first instance avoids the bushfire risk, but where unavoidable, manages and/or mitigates the risk to people, property and infrastructure to an acceptable level. The preservation of life and the management of bushfire impact are paramount (SPP 3.7 cl. 1).

The Relevant Policy Outcome: Ensure the design and capacity of vehicular access provides for efficient and effective evacuation to a suitable destination(s); and/or as a contingency measure for vulnerable land uses, an on-site shelter, where demonstrated appropriate, as a last resort option (SPP 3.7, cl. 6.3):

Determination of Risk Level for Use in Informing Decision Making

Bushfire Prone Planning (BPP) applies the following risk assessment framework to assess the levels of relevant risks associated with a bushfire event impacting proposed vehicular access routes.



The interacting factors contributing to the level of bushfire risk are:

- The levels of threat potentially generated by the direct attack mechanisms of a bushfire in the subject vegetation i.e. primarily flames, radiant heat, embers but due consideration of smoke, and erratic fire driven wind when necessary.

  These threat levels (and therefore bushfire risk) can be reduced when a bushfire hazard threat is less likely to be generated due to vegetation characteristics and/or the bushfire hazard threat level is lowered by the application of threat reducing protection measures.

- The level of exposure of persons and/or property (as relevant to the assessment), to the threats. These exposure levels (and therefore bushfire risk) are potentially lowered by the existence or application of effective and sufficient exposure reducing protection measures.

- The level of vulnerability of persons and/or property (as relevant to the assessment), to the threats. These vulnerability levels (and therefore bushfire risk) are potentially lowered by the existence or application of effective and sufficient vulnerability reducing protection measures.

The Vehicular Access Route Safe Use Attributes

In the following assessment, these bushfire protection measures are being identified as vehicular access safe use attributes. Consideration of the degree to which the safe use attributes exist and/or can be applied to a planning proposal results in:

- A justifiable qualitative assessment of the potential level of residual risk to persons to be presented being developed; and

- Understandable and practical information being presented to assist an assessor and/or decision maker form a view as to the tolerability or acceptability of the residual risk level.

IMPORTANT ACKNOWLEDGEMENT

SIGNIFICANT RESIDUAL RISK CAN BE RETAINED BY APPLICABLE ACCEPTABLE SOLUTIONS

In making determinations regarding the ability of existing/proposed vehicular access to present an acceptable or tolerable level of risk, it is important to appreciate that the acceptable solution pathway is **not always a lower or no risk solution.**

For example, regarding access, where it incorporates a mandatory maximum no-through road to a point of two-way access or EAW length, as a primary acceptable solution, is only addressing a single safe use attribute and ignores significant other attributes that can increase or decrease risk levels to access route users.

Consequences of this simplified approach can result in planning scenarios where too much residual risk is retained (and this can be at a significant level), or lower residual risk is retained than necessary. However, the deemed-to-comply pathway does not differentiate between these two states.

The alternative assessment pathway (outcomes-based) enables conducting a finer grained assessment of the access route(s) that considers each safe use attribute. This methodology can better justify if the road network can present a tolerable/acceptable level of residual risk to persons traversing them – or not.

Assessment Outcome Summary

For the proposed development, all the assessed attributes that determine the availability and safe use of vehicular access (i.e., the intent of Element 3), has determined:

- No potential residual risk is identified that is greater than that which can be retained by the application of the relevant acceptable solutions in a worst case compliant scenario; and
- In particular, the potential residual risk associated with types, extent and fuel loads of bushfire prone vegetation adjoining and adjacent to Horse Hill Road and the number and 'vulnerability of persons that will need to use the route, are significantly lower.

5.5 Recommended Additional Bushfire Protection Measures – Informing the Proponent and Decision Maker

EXPLANATORY INFORMATION

Advice is presented in this section regarding additional bushfire protection measures (or protection measure detail) that should, in the opinion of the bushfire consultant, be considered for application by the subject planning proposal.

This information is intended to address one or more of the following when considered necessary:

- How the levels of risks associated with a bushfire event can be further reduced by either decreasing bushfire hazard threat levels and/or reducing the exposure and/or vulnerability of persons and/or property to those threats - as a more comprehensive consideration of a site and its use.
- Provision of advice when an acceptable solution (contained in the bushfire protection criteria), does not state requirements with the level of detail necessary to fully inform the application of a protection measure(s).
- The bushfire protection criteria for the whole site, in accordance with requirements established by the Guidelines for development applications for additions to a habitable building or a vulnerable land use.
- Any issues that have been identified in Section 4: 'Bushfire Hazard Issues' of this BMP.

These recommendation(s) are the result of the consultant's due diligence in assessing the planning proposal and is based on their experience and expertise being applied within the specific context of the subject planning proposal.

Importantly, the recommendations are only intended to inform and there is no requirement for their implementation being created by presenting this information.

Consequently, these recommended protection measures(s) and their detail, will not be included in Section 6: 'Responsibility Checklists', as they are not specific requirement(s) established by SPP 3.7, the Guidelines or a planning application 'decision maker'.

An exception to this can exist should any of the recommendation(s) be adopted by the proponent or required by the decision maker at a later stage of planning (e.g. as a condition of approval), and there is instruction for their incorporation into a revised version of the BMP.

As an additional bushfire protection measure, the proposal incorporates multiple, complementary layers of risk mitigation that collectively exceed the minimum requirements of the applicable guidelines. While the guidelines typically require the provision of one of the following measures to address bushfire risk, this proposal includes a combination of several measures to provide a higher level of safety and resilience.

Specifically, the development provides an onsite shelter as a last-resort protection option, together with an emergency accessway to support emergency vehicle access and patron movement during an incident. In addition, operational management controls are proposed through the implementation of closure days during periods of elevated bushfire risk. The facility will be closed to patrons on days where fire danger conditions exceed the nominated threshold, thereby significantly reducing occupant exposure at times of heightened risk.

The use of closure days, along with broader bushfire preparedness and response procedures, will be documented in detail within a Bushfire Emergency Plan (BEP) to be prepared at a later stage to accompany this document. This BEP will outline triggers for closure, communication protocols, emergency response actions, and reopening procedures. Further measures will include the provision of clear and consistent signage, education and information for patrons, and comprehensive bushfire awareness and emergency response training for staff.

In combination, these measures deliver a level of bushfire protection that is above and beyond what is typically required under the guidelines, demonstrating a proactive, risk-based approach that prioritises life safety and emergency preparedness in recognition of the site's constraints.

6 RESPONSIBILITY CHECKLISTS

EXPLANATORY INFORMATION

This section of the BMP sets out the responsibilities of the relevant entity or person for:

- The initial implementation of the required bushfire protection measures and their timing; and
- The ongoing maintenance of the required bushfire protection measures to ensure their continued effectiveness.

Note: Protection measures that may be recommended by the bushfire consultant in the BMP section titled "Additional Recommended Bushfire Protection Measures' are not included in the Responsibility Checklists (at least initially).

The reason for this is the additional measure(s) are either:

- Provided as additional risk management advice to the proponent and it is up to them to choose to apply; or
- Part of an outcomes-based approach being applied to satisfy the required outcomes of SPP 3.7. Consequently, the need for their application (which would create a responsibility) is currently subject to assessment and approval by the decision maker.

  When their application is established by planning approval, the responsibility checklists in this BMP will be required to be updated.

6.1 Protection Measure Implementation Checklist

TABLE 6.1 PROPONENT/LANDOWNER RESPONSIBILITIES PRIOR TO SALE/OCCUPANCY/OPERATION	
No.	IMPLEMENTATION OF BUSHFIRE PROTECTION MEASURES Measures Established Under SPP 3.7 / Guidelines
1	Install an Asset Protection Zone (APZ) surrounding habitable buildings. It must: 1. Consist of non-vegetated areas and low bushfire threat vegetation, able to be maintained in perpetuity in a low threat state, by complying with the established APZ technical requirements (refer to the Guidelines Appendix B2 and Appendix B3 of this BMP); and 2. Be located within the boundaries of the lot except for any allowable variances allowed and discussed in the assessment against the bushfire protection criteria in Section 5, Element 2: Siting and design, and the relevant APZ acceptable solution. (Refer also to the illustrated APZ on the Property Bushfire Management Statement in Section 6.3); and 1. Have dimensions equal to the minimum distances corresponding to the BAL-29 rating as these are the distances approved for implementation when this BMP is approved by the decision maker (refer to the insert table below for the BAL-29 dimensions). Exceptions to this APZ dimension limitation exists when: • The relevant building/structure has a lower certified ('determined') BAL rating - either via the assessment in this BMP or a subsequent BAL Assessment Report - in which case the dimensions corresponding to the applicable BAL rating in the table below will apply; or • The relevant building is associated with a vulnerable tourism land use, can be used as an on-site shelter and is to be subject to radiant heat exposure not exceeding 10 kW/m^2, in which case the corresponding dimensions in the table below are to apply; or

- The larger dimensioned APZ does not require the modification/removal of native vegetation.

THE MINIMUM (SITE SPECIFIC) VEGETATION SEPARATION DISTANCES ESTABLISHING APZ DIMENSIONS [1]							
Building / Structure	Vegetation Classification [2]		Minimum Distances (metres) Corresponding to Potential Bushfire Impact				
	Area / Class		2 kW/m²	10 kW/m²	BAL12.5	BAL-19	BAL-29
Existing house to be converted to admin building	1	(C) Shrubland	-	-	28	19	13
	2	(D) Scrub	-	-	35	24	17
	3	(D) Scrub	-	-	31	22	15
	4	(D) Scrub	-	-	27	19	13
On-site Shelter	1	(C) Shrubland	-	-	-	-	-
	2	(D) Scrub	-	-	-	-	-
	3	(D) Scrub	-	49	-	-	-
	4	(D) Scrub	-	45	-	-	-
Note 1: Will include the application of the radiant heat barrier when applicable to the proposal. Note 2: Refer to the Vegetation and Topography Map in Section 3.2.4							

Note 1: If a BAL rating lower than BAL-29 can be achieved by the proposed building works but native vegetation is required to be modified or removed to establish the associated larger APZ, ensure prior approval has been received from the relevant authority before installing.

Note 2: Greater APZ dimensions than those derived from the above information may be established by a Local Government's Section 33 Notice Under the Bush Fires Act 1954. When relevant to the subject development this is identified below in this table and must be given due regard when installing the APZ.

Note 3: Greater APZ dimensions than those derived from the above information are established via the application of the Building Code of Australia and its bushfire resistance requirements for the subject Class 9 vulnerable use buildings. This is identified below in this table and must be given due regard when installing the APZ.

2	Ensure the construction of the private driveways / internal vehicular access complies with the technical requirements stated and/or referenced in Section 5.3 of the BMP at Element 3: Vehicular access, A3.7 Internal vehicular access and private driveways.
3	The development is a 'vulnerable land use'. Ensure the required signage is provided within the subject site, advising of where each access route travels to and the distance and general information on what to do in the event of a bushfire. Comply with the site specific requirements established in the BMP at Element 3: Vehicular access, A3.8 Signage.
4	Install the required volume firefighting water supply tank (minimum 10,000 litres and up to 50,000 litres when applicable), including fittings and the required hardstand/access, to comply with the technical requirements stated and/or referenced in Section 5.3 of the BMP at Element 4: Water supply.

5	A purchaser, occupier and/or operator of the site must be made aware of the existence of this approved BMP and provided with access to a copy and be informed of the ongoing responsibilities it contains.
6	The development is a 'vulnerable land use', and a Bushfire Emergency Plan (BEP) must be produced for site operations. Complete all relevant actions contained within the 'Site Preparation Procedure'.
7	The development is a 'vulnerable land use', and the requirement for an onsite shelter to be designed and constructed has been identified (building or area). Refer to the BMP at Element 2: Siting and design, A2.5 and ensure: • For a building, all referenced design and construction requirements are met; • The necessary separation distances from bushfire prone vegetation are met; and • Associated pedestrian paths are clearly signposted.
8	An onsite shelter has been designed and constructed. Prior to occupation of the development, a final inspection of the on-site shelter must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. The fire engineer should provide certification, to the satisfaction of the local government, that the works have been completed in accordance with the requirements of the BCA and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). (Guidelines 8.2b)
IMPLEMENTATION OF BUSHFIRE PROTECTION MEASURES Measures Established by this BMP as a Required Additional Measure in Section 5.5	
10	Implement the bushfire protection measures that have been established within Section 5.5: 'Required Additional Bushfire Protection Measures', that are additional to and/or a variation to those established by the applicable acceptable solutions of the bushfire protection criteria and that must be implemented '. In summary these are: • Construction of the alternative Emergency Accessway providing access between Horse Hill Road and Magpie Rise, including the installation of appropriate directional and emergency signage. • Planning for and strict adherence to facility and overnight accommodation closure days during periods of elevated bushfire risk. • Provision of clear signage and information to patrons and staff outlining emergency response procedures. • Delivery of emergency response training to staff to ensure effective implementation of bushfire management and evacuation protocols.
IMPLEMENTATION OF BUSHFIRE PROTECTION MEASURES Measures Established by a Local Government's Section 33 Notice Under the Bush Fires Act 1954	
11	Install the required firebreaks, providing emergency access within the lot, to the stated specifications established by the Shire of Jerramungup Fire Control Information Notice. *Note: This is not a requirement under the land use planning requirements established by SPP 3.7 Bushfire or the associated Guidelines. However, for informative purposes, the existence of this responsibility is noted in this checklist and must be given due regard.*

12	Install the required asset protection zone surrounding relevant buildings to the dimensions and technical requirements established by the Shire of Jerramungup Fire Control Information Notice when these are greater than the dimensions corresponding to either the BAL-29 rating or the 'determined' BAL rating(s) for the relevant buildings stated in implementation responsibility No. 1 above. *Note: This is not a requirement under the land use planning requirements established by SPP 3.7 Bushfire or the associated Guidelines. However, for informative purposes, the existence of this responsibility is noted in this checklist and must be given due regard.*
	IMPLEMENTATION OF BUSHFIRE PROTECTION MEASURES Measures Established by the Building Code of Australia (Vol. 1 and 2 of the National Construction Code)
13	Inform builders engaged to construct dwellings/additions and/or other relevant structures on a lot, of the existence of this approved Bushfire Management Plan (BMP). The existence of the BMP identifies that the development site is within a designated bushfire prone area. It indicates that bushfire construction standards (corresponding to an assessed bushfire attack level (BAL) for the building), may need to be applied to satisfy the bushfire performance requirements of the BCA. The BMP typically will only provide indicative BAL ratings. A separate assessment will likely be required to determine the applicable BAL rating (and produce a BAL Certificate), once site plans and conditions are established as the post development state. This BMP may also establish, as a 'Required Additional Bushfire Protection Measure', that bushfire construction requirements to be applied must be those corresponding to a specified higher BAL rating. Compliance with the current Building Code of Australia (Volumes 1 and 2 of the National Construction Code), will require certain bushfire resistant construction requirements be applied to residential buildings in bushfire prone areas (i.e., Class 1, 2 and 3 and associated Class 10a buildings and decks) and Class 9 vulnerable use buildings. Other classes of buildings may also be required to comply with these construction when established by the relevant authority or if identified as a 'Required Additional Bushfire Protection Measure' bushfire protection measure within the BMP. The deemed to satisfy solutions that will meet the relevant bushfire performance requirements are found in AS 3959 – Construction of Building in Bushfire Prone Areas (as amended) and for Class 1 and associated Class 10a buildings only, the NASH Standard - Steel Framed Construction in Bushfire Areas (as amended). *Note: This is not a requirement under the land use planning requirements established by SPP 3.7 Bushfire or the associated Guidelines. However, for informative purposes, the existence of this responsibility is noted in this and must be given due regard.*

6.2 Protection Measure Maintenance Checklist

TABLE 6.2 LANDOWNER/OCCUPIER – MAINTENANCE OF BUSHFIRE PROTECTION MEASURES	
No.	MAINTENANCE OF BUSHFIRE PROTECTION MEASURES Measures Established Under SPP 3.7 / Guidelines
1	Annually review and enact the following maintenance responsibilities established in this approved BMP for the development site prior to the bushfire season.
2	The site's use is a 'vulnerable use', and a Bushfire Emergency Plan (BEP) has been produced for site operations. Complete all relevant actions contained within the 'Site Preparation Procedure' annually prior to the bushfire season.
3	Maintain the Asset Protection Zone (APZ) surrounding all habitable buildings by applying: 1. The Established APZ Technical Requirements: The APZ must consist of non-vegetated areas and low bushfire threat vegetation maintained in perpetuity in the low threat state by complying with the established APZ technical requirements (refer to the Guidelines Appendix B2 and Appendix B3 of this BMP); and 2. The Established APZ Dimensions: Refer to the first item of the protection measure implementation checklist in the preceding Table 6.1 in which the required dimensions have been established. Where these include the authority to maintain offsite land as part of the APZ this is identified below. The required dimensions will be either: (a) The dimensions corresponding to the determined BAL rating(s) applicable to each habitable building. This ensures the building's constructed bushfire resistance continues to align with its calculated potential exposure to flame contact and radiant heat; or (b) Where a relevant building is associated with a vulnerable tourism land use and is to be used as an on-site shelter – then the dimensions corresponding to a radiant heat exposure of 10 kW/m2; or (c) In the absence of an applicable determined BAL rating for a building/structure, the dimensions should be no greater than the minimum distances corresponding to the BAL-29 rating. *Note 1: Where greater APZ dimensions than those derived from the above information are established by a Local Government's Section 33 Notice Under the Bush Fires Act 1954 these must be given due regard when maintaining the APZ. When this requirement is relevant to the subject development it is identified in the implementation checklist in the preceding Table 6.1 and below in this table.* *Note 2: Greater APZ dimensions than those derived from the above information are established via the application of the Building Code of Australia and its bushfire resistance requirements for the subject Class 9 vulnerable use buildings. This is identified in the implementation checklist in the preceding Table 6.1 and below in this table and must be given due regard when maintaining the APZ.*
4	Classified vegetation has been assessed as remaining onsite, and it has influenced the BAL rating that is to apply to relevant buildings (refer to Figure 3.1.1). Ensure that this vegetation is not actively modified in the future to present higher bushfire threat levels corresponding to a different classification type (e.g. change Grassland to Shrubland or Woodland to Forest).

6	Maintain the private driveways / internal vehicular access to comply with the technical requirements stated and/or referenced in Section 5.3 of the BMP at Element 3: Vehicular access, A3.7 Internal vehicular access and private driveways.
7	The development is a 'vulnerable land use'. Maintain the required signage within the subject site, advising of where each access route travels to and the distance and general information on what to do in the event of a bushfire. Comply with the site specific requirements established in the BMP at Element 3: Vehicular access, A3.8 Signage.
8	Maintain the fighting water supply tank(s), including fittings and the required hardstand/access, in good working condition. Ensure the tanks are maintained at full capacity.
9	The site use is a 'vulnerable use', and an onsite shelter has been designed and constructed (building or area). Refer to the BMP at Element 2: Siting and design, A2.5 and ensure: • For a building, all referenced design and construction requirements are maintained; • The necessary separation distances from bushfire prone vegetation are maintained; and • Associated pedestrian paths remain clearly signposted and maintained clear of combustible materials including accumulated vegetation debris and readily flammable plant species.
10	An onsite shelter has been designed and constructed, ensure the ongoing maintenance of this on-site shelter to ensure continued compliance.
11	When the property changes ownership or occupancy, to assist with the ongoing maintenance of the implemented bushfire protection measures, ensure that the relevant person(s) is aware of the BMP, and the responsibilities it contains. Provide access to a copy of the BMP and the Bushfire Emergency Plan (BEP).
MAINTENANCE OF BUSHFIRE PROTECTION MEASURES Measures Established by this BMP as a Required Additional Measure in Section 5.5	
12	Maintain the bushfire protection measures that have been established within Section 5.5: 'Required Additional Bushfire Protection Measures', that are additional to and/or a variation to those established by the applicable acceptable solutions of the bushfire protection criteria and that must be implemented '. In summary these are: • The alternative Emergency Accessway providing access between Horse Hill Road and Magpie Rise, including appropriate directional and emergency signage. • Facility and overnight accommodation closure days during periods of elevated bushfire risk. • Clear signage and information to patrons and staff outlining emergency response procedures. • Delivery of emergency response training to staff to ensure effective implementation of bushfire management and evacuation protocols.
MAINTENANCE OF BUSHFIRE PROTECTION MEASURES Measures Established by a Local Government's Section 33 Notice Under the Bush Fires Act 1954	

13	Maintain the required firebreaks, providing emergency access within the lot, to the stated specifications established by the Jerramungup Fire Control Information Notice. *Note: This is not a requirement under the land use planning requirements established by SPP 3.7 Bushfire or the associated Guidelines. However, for informative purposes, the existence of this responsibility is noted in this checklist and must be given due regard.*
14	Maintain the required asset protection zone surrounding relevant buildings to the dimensions and technical requirements established by the Jerramungup Fire Control Information Notice when these are greater than the dimensions identified in the implementation checklist in the preceding Table 6.1 corresponding to either the BAL-29 rating or the 'determined' BAL rating(s) for the relevant buildings. *Note: This is not a requirement under the land use planning requirements established by SPP 3.7 Bushfire or the associated Guidelines. However, for informative purposes, the existence of this responsibility is noted in this checklist and must be given due regard.*
	MAINTENANCE OF BUSHFIRE PROTECTION MEASURES Measures Established by the Building Code of Australia (Vol. 1 and 2 of the National Construction Code)
15	Prior to any future building work, inform the builder of the existence of this approved Bushfire Management Plan (BMP). The BMP identifies that the development site is within a designated bushfire prone area and states the indicative (or determined) BAL rating(s) that may (or will) be applied to buildings/structures. A BAL assessment report may be required to confirm determined ratings and will be required when stated ratings are only indicative. BAL certificates will need to be produced to accompany building applications. The BMP may also establish, as a 'Required Additional Bushfire Protection Measure', that bushfire construction requirements to be applied must be those corresponding to a specified higher BAL rating. Compliance with the current Building Code of Australia (Volumes 1 and 2 of the National Construction Code), will require certain bushfire resistant construction requirements be applied to residential buildings in bushfire prone areas (i.e., Class 1, 2 and 3 and associated Class 10a buildings and decks) and Class 9 vulnerable use buildings. Other classes of buildings may also be required to comply with these construction when established by the relevant authority or if identified as a 'Required Additional Bushfire Protection Measure' bushfire protection measure within the BMP. The deemed to satisfy solutions that will meet the relevant bushfire performance requirements are found in AS 3959 – Construction of Building in Bushfire Prone Areas (as amended) and for Class 1 and associated Class 10a buildings only, the NASH Standard - Steel Framed Construction in Bushfire Areas (as amended). *Note: This is not a requirement under the land use planning requirements established by SPP 3.7 Bushfire or the associated Guidelines. However, for informative purposes, the existence of this responsibility is noted in this checklist and must be given due regard.*

APPENDIX A: DETAILED BAL ASSESSMENT DATA AND SUPPORTING INFORMATION

A1: BAL Assessment Inputs Common to the Method 1 and Method 2 Procedures

A1.1: FIRE DANGER INDICES (FDI/FDI/GFDI)

When using Method 1 the relevant FDI value required to be applied for each state and region is established by AS 3959:2018, Table 2.1. Each FDI value applied in Tables 2.4 – 2.7 represents both the Forest Fire Danger Index (FFDI) and a deemed equivalent for the Grassland Fire Danger Index (GFDI), as per Table B2 in Appendix B. When using Method 2, the relevant FFDI and GFDI are applied.

The values may be able to be refined within a jurisdiction, where sufficient climatological data is available and in consultation with the relevant authority.

Relevant Jurisdiction:	WA	Region:	Whole State	Method 1	Applied FDI:	80
				Method 2	Applied FFDI:	N/A
					Applied GFDI:	N/A

A1.2: VEGETATION ASSESSMENT AND CLASSIFICATION

Vegetation Types and Classification

In accordance with AS 3959:2018 Clauses 2.2.3 and C2.2.3.1, all vegetation types within 100 metres of the 'site' (defined as "the part of the allotment of land on which a building stands or is to be erected"), are identified and classified. Any vegetation more than 100 metres from the site that has influenced the classification of vegetation within 100 metres of the site, is identified and noted. The maximum excess distance is established by AS 3959: 2018 Clause 2.2.3.2 and is an additional 100 metres.

Classification is also guided by the Visual Guide for Bushfire Risk Assessment in WA (WA Department of Planning February 2016) and any relevant FPA Australia practice notes.

Modified Vegetation

The vegetation types have been assessed as they will be in their natural mature states, rather than what might be observed on the day. Vegetation destroyed or damaged by a bushfire or other natural disaster has been assessed on its expected re-generated mature state. Modified areas of vegetation can be excluded from classification if they consist of low threat vegetation (refer to Appendix B) and that any required active management can be expected to continue in perpetuity, and this can be adequately justified.

The Influence of Ground Slope

Where significant variation in effective slope exists under a consistent vegetation type, these will be delineated as separate vegetation areas to account for the difference in potential bushfire behaviour, in accordance with AS 3959:2018 Clauses 2.2.5 and C2.2.5.

THE INFLUENCE OF VEGETATION GREATER THAN 100 METRES FROM THE SUBJECT SITE	
Vegetation area(s) within 100m of the site whose classification has been influenced by the existence of bushfire prone vegetation from 100m – 200m from the site:	None
Assessment Statement:	No vegetation types exist close enough, or to a sufficient extent, within the relevant area to influence classification of vegetation within 100 metres of the subject site.

VEGETATION AREA 1				
Classification	**C. SHRUBLAND**			
Types Identified	Open heath C-11	Open heath C-11	Open heath C-11	
Exclusion Clause	N/A			
Effective Slope	Measured	d/slope 9 degrees	Applied Range (Method 1)	Downslope >10-15 degrees
Justification Comments:	The vegetation surrounding the site is classified as Class C – Shrubland. The shrubland is located on a steep coastal slope adjacent to the ocean, which has resulted in stunted vegetation growth due to exposure to harsh coastal conditions such as strong winds, salt spray, and shallow, nutrient-poor soils. The vegetation comprises low, wind-pruned sclerophyllous shrubs and heath species, forming a continuous shrub layer typically less than 2 metres in height.			
Post Development Assumptions:	Onsite vegetation within the indicated APZ must be managed in accordance with the guidelines set out in Appendix B of this report. This includes the management of understorey grasses, under pruning branches to a height of 2 metres above the ground and managing fine fuels load.			



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VEGETATION AREA 2				
Classification	**D. SCRUB**			
Types Identified	Closed scrub D-13		Open scrub D-14	
Exclusion Clause	N/A			
Effective Slope	Measured	d/slope 9 degrees	Applied Range (Method 1)	Downslope >5-10 degrees
Justification Comments:	The vegetation surrounding the site is classified as Class D – Scrub. The vegetation consists predominantly of dense coastal shrubland, with most of the vegetation generally under 2 metres in height due to stunted growth caused by exposure to coastal winds, salt spray, and shallow soils. However, scattered peppermint trees (*Agonis flexuosa*) are also present within the area, which are capable of reaching greater heights and contributing to an elevated bushfire risk. While the overall structure appears closer to shrubland, the presence of these taller species and the density of the vegetation warrant classification under a worst-case scenario as Class D – Scrub.			
Post Development Assumptions:	Onsite vegetation within the indicated APZ must be managed in accordance with the guidelines set out in Appendix B of this report. This includes the management of understorey grasses, under pruning branches to a height of 2 metres above the ground and managing fine fuels load.			



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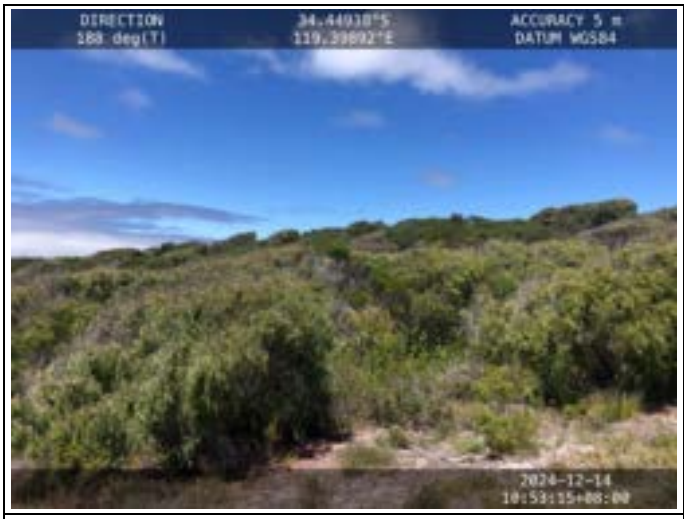
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VEGETATION AREA 3				
Classification	**D. SCRUB**			
Types Identified	Closed scrub D-13		Open scrub D-14	
Exclusion Clause	N/A			
Effective Slope	Measured	d/slope 4 degrees	Applied Range (Method 1)	Downslope >0-5 degrees
Justification Comments:	The vegetation surrounding the site is classified as Class. This vegetation type is characterised by a dense growth of shrubs and low trees, typically ranging in height from 1 to 6 metres. The scrub consists primarily of coastal heath and mallee shrubland species, including a mix of sclerophyllous shrubs, banksias, melaleucas, and occasional small eucalypts. The overall fuel continuity is high due to the density and flammability of the mid-storey vegetation.			
Post Development Assumptions:	Onsite vegetation within the indicated APZ must be managed in accordance with the guidelines set out in Appendix B of this report. This includes the management of understorey grasses, under pruning branches to a height of 2 metres above the ground and managing fine fuels load.			



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VEGETATION AREA 4				
Classification	**D. SCRUB**			
Types Identified	Closed scrub D-13		Open scrub D-14	
Exclusion Clause	N/A			
Effective Slope	Measured	flat 0 degrees	Applied Range (Method 1)	Upslope or flat 0 degrees
Justification Comments:	The vegetation surrounding the site is classified as Class. This vegetation type is characterised by a dense growth of shrubs and low trees, typically ranging in height from 1 to 6 metres. The scrub consists primarily of coastal heath and mallee shrubland species, including a mix of sclerophyllous shrubs, banksias, melaleucas, and occasional small eucalypts. The overall fuel continuity is high due to the density and flammability of the mid-storey vegetation.			
Post Development Assumptions:	Onsite vegetation within the indicated APZ must be managed in accordance with the guidelines set out in Appendix B of this report. This includes the management of understorey grasses, under pruning branches to a height of 2 metres above the ground and managing fine fuels load.			



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VEGETATION AREA 5				
Classification	**N/A**			
Types Identified	N/A			
Exclusion Clause	2.2.3.2 (e) Non-vegetated area			
Effective Slope	Measured	N/A	Applied Range (Method 1)	N/A
Justification Comments:	Non vegetated areas include private driveways, and accessways, houses, and gravel car parks.			
Post Development Assumptions:	Reasonably expected to remain as is in perpetuity.			



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VEGETATION AREA 6				
Classification	**N/A**			
Types Identified	N/A			
Exclusion Clause	2.2.3.2 (f) Low threat vegetation - minimal fuel condition.			
Effective Slope	Measured	N/A	Applied Range (Method 1)	N/A
Justification Comments:	Low threat vegetation includes a patch of reticulated lawn and some small patches of modified vegetation near the driveway that are managed to minimal fuel condition.			
Post Development Assumptions:	Low threat vegetation is reasonably expected to remain in a low threat state in perpetuity.			



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A1.3: EFFECTIVE SLOPE

EXPLAINING THE ASSESSMENT METHODOLOGY APPLIED BY BUSHFIRE PRONE PLANNING

DEFINITION: Effective slope is "the slope under that classified vegetation which most influences the bushfire attack" (AS 3959:2018, Clause 1.5.11).

"The effective slope under the classified vegetation is not the same as the average slope for the land surrounding the site of the proposed building. The effective slope is that slope which most significantly influences bushfire behaviour" (AS 3959:2018, Clause CB4).

The slope is described as upslope, flat or downslope when viewed from an exposed element (e.g., building) and looking towards the vegetation. It is measured in degrees.

[Note: Additional relevant guidance provided by AS 3959:2018 and NSW RFS, Planning for Bushfire Protection (2019) is incorporated into the applied assessment methodology and is presented at the end of this explanation.]

COMPOUND SLOPES UNDER VEGETATION AND DETERMINING SLOPE SIGNIFICANCE

Non-Linear Slopes: When the slope of ground under the vegetation out to the distance to be assessed (100 m or further if necessary), is not a straight line or nearly straight line slope, then it is made up of several different slopes i.e., it is a compound slope. The different slope angles and lengths must be factored into the determination of the effective slope value to be applied. Different slopes will potentially influence the bushfire rate of spread and intensity, both increasing and decreasing it.

Significant Slope: The AS 3959:2018 bushfire attack level determination methodology, with default inputs, models a fully developed bushfire. Therefore, a 'significant' slope is one that will significantly influence bushfire behaviour. To be 'significant' the length of the slope must be 'sufficient' to support a fully developed fire on that slope. The angle of a significant slope could be the determined effective slope for the area of classified vegetation if it is the one that 'most influences the bushfire attack'.

Sufficient Slope Length: Is a slope that will, as a minimum, allow the entire flame depth (flaming zone) of a fully developed fire (100m flame width) to exist on that slope.

The expected flame depth of a fully developed bushfire is a function of the length of time the flaming phase will exist on a section of the fuel bed (the 'residence time') and the bushfire's 'rate of spread'. For a given rate of spread, longer residence times result in greater flame depths. Greater flame depths are correlated with greater flame temperatures and greater flows of radiant heat.

The primary factors that will increase the residence time are:

- Heavier fine fuel loads of grass, leaf litter, twigs, bark etc less than 6mm in width and existing within the surface and near surface layers (and elevated fuel layers when contiguous with the base layers); and
- A greater percentage of larger fine fuels within the fuel load.

The primary factors that increase the rate of spread (apart from fire weather factors), include finer fuels, drier fuels, horizonal continuity of fuel and steeper upward ground slope in the direction of fire travel.

Example values:

- Residence Time: Grassfire 5 – 15 seconds, Forest fire 25 -50 seconds.
- Rate of Spread: Grassfires of a few km/hr are considered fast moving, 5-10 km/hr is common and fastest in the order of 25km/hr. Forest fire typically recorded in metres/hour with 1-1.5 km/hr being considered fast moving and fastest in the order of 3–4 km/hr.
- Flame Depth: More typically, a few metres for grasses to tens of metres for forest fires.

An Isolated Slope: For scenarios where there is a single significant slope (based on the above criteria) additional consideration would need to be given to the time and distance consumed by a bushfire still in its 'developing' phase. This will require due consideration be given to how it is potentially ignited i.e., from a single or multiple points, as this will influence the time and distance required to fully develop. For such scenarios, a normally significant slope may not be sufficiently long. It may be necessary to determine the potential bushfire impact more accurately by

justifying the application of a lesser effective slope, or a lower threat vegetation classification, or calculating a reduced head fire width (using short fire run modelling).

Determined Effective Slope: Only a 'significant' slope can potentially be the effective slope by itself. In which case, for a defined area of classified vegetation area, the worst significant slope under that vegetation is to apply.

The table below presents Bushfire Prone Planning's considerations applied to assessing short and/or compound slopes in determining the effective slope.

Slope Length (m)	Considered a Significant Slope	Considerations in Determining the Effective Slope
< 5	No	Where these short slopes exist as part of a compound slope under an area of classified vegetation, they can be ignored as they will not influence the fire behaviour in that vegetation.
5-20	Will Vary	These slopes will have a range of influence on fire behaviour from very little to a degree of influence that must be accounted for to some extent by the effective slope value that is applied (i.e., with a greater length - apply to a greater extent). But the actual slope of these shorter slopes is less likely to be applied as it is not a 'significant' length.
20-30	Possibly - Likely	The same considerations applied to the 5-20m slope lengths should be applied here. However, more justification would need to be presented to support an assessment of not 'significant'. For these slope lengths, consideration must be given more broadly to the potential level of risks associated with a bushfire event in this location. The risk level will be a function of the bushfire hazard threat levels (direct attack mechanisms) within the immediate and broader assessment area as influenced by local topography, vegetation extents and types and the exposure and vulnerability of persons and/or buildings/structures to these threats. Higher consequent risk levels require greater precaution meaning these length slopes should be considered 'significant', and vice versa. Consider the potential for a bushfire on adjoining or nearby land be a source of ignition and/or pre-heating to vegetation on the subject slope. Consider if vegetation on the slope is likely be ignited by a single ignition point or is multipoint ignition possible from bushfire an adjoining slopes or the surrounding area. Single point ignition will require a fire to travel further before being fully developed (DFES considers less than 100m fire runs may be considered a short fire run for forest, woodland and scrub vegetation classifications, RFS NSW applies 150m). Isolated slopes of this length are less likely to be considered significant as compared to when part of a compound slope.
>30	Yes	Likely to always be a significant slope unless isolated (i.e., exists alone) – in which case, justifying the application of a lesser effective slope, or a lower threat vegetation classification, or calculating a reduced head fire width, are approaches that may justifiably be applied.

BPP Approach - Slope Variation Within Areas of Vegetation

When multiple 'significant' slope lengths with large differences in degrees of effective slope (or different applicable slope ranges when AS 3959:2018 Method 1 is applied), exists under a single vegetation classification, these will be delineated as separate vegetation areas of classified vegetation to account for the difference in potential bushfire behaviour and impact, in accordance with AS 3959:2018 clauses 2.2.5 and C2.2.5.

Effective Slope Variation Due to Multiple Development Sites

When the effective slope, under a single area of bushfire prone vegetation, will vary significantly relative to multiple proposed development sites (exposed elements), then the effective slopes corresponding to each of the different

locations, are separately identified. The relevant (worst case) effective slope is determined in the direction corresponding to the potential directions of fire spread towards the subject building(s).

AS 3959:2018 EFFECTIVE SLOPE DETERMINATION - GUIDANCE

The Standard presents a broad set of guidance statements that indicate the intent of deriving an effective slope value for use in calculations, rather than detailing the 'in the field' determination process. These include:

- Highlighting the importance of the value by stating "The slope of the land under the classified vegetation has a direct influence on the rate of fire spread, the severity of the fire and the ultimate level of radiant heat flux" (Clause C2.2.5). [Note: A common rule of thumb is that for every 10 degrees of upslope, a fire will double its rate of spread if moving in the direction of the prevailing wind].
- "It may be necessary to consider the slope under the classified vegetation for distances greater than 100 m in order to determine the effective slope for that vegetation classification) … (i.e. the vegetation within 100 m) (Clause C2.2.5).
- "Where there is more than one slope within the classified vegetation, each slope shall be individually assessed, and the worst case Bushfire Attack Level shall apply" (Clause 2.2.5).

NSW RFS 2019, PLANNING FOR BUSHFIRE PROTECTION - APPENDIX A1.5 - ADDITIONAL DETERMINATION GUIDANCE

- "In identifying the effective slope - it may be found that there are a variety of slopes covering different distances within the vegetation. The effective slope is considered to be the slope under the vegetation which will most significantly influence the bushfire behaviour for each aspect. This is usually the steepest slope. In situations where this is not the case, the proposed approach must be justified".
- "Vegetation located closest to an asset may not necessarily be located on the effective slope".

SITE ASSESSMENT DETAILS - EXPLANATION & JUSTIFICATION

The effective slopes determined from the site assessment are recorded in Table 3.2 of this Bushfire Management Plan.

A1.4: SEPARATION DISTANCE

Measuring

The separation distance is the distance in the horizontal plane between the receiver (building/structure or area of land being considered) and the edge of the classified vegetation (AS 3959:2018, clause 2.2.4)

The relevant parts of a building/structure from which the measurement is taken is the nearest part of an external wall or where a wall does not exist, the supporting posts or columns. Certain parts of buildings are excluded including eaves and roof overhangs.

The edge of the vegetation, for forests and woodlands, will be determined by the unmanaged understorey rather than either the canopy (drip line) or the trunk (AS 3959:2018, clause C2.2.5).

Measured Separation Distance as a Calculation Input

If a separation distance can be measured because the location of the building/structure relative to the edge of the relevant classified vegetation is known, this figure can be entered into the BAL calculation. The result is a determined BAL rating.

Assumed Separation Distance as a Calculation Input

When the building/structure location within the lot is not known, an assumed building location may be applied that would establish the closest positioning of the building/structure relative to the relevant area of vegetation.

The assumed location would be based on a factor that puts a restriction on a building location such as:

- An established setback from the boundary of a lot, such as a residential design code setback or a restrictive covenant; or
- Within an established building envelope.

The resultant BAL rating would be indicative and require later confirmation (via a Compliance Report) of the building/structure actual location relative to the vegetation to establish the determined BAL rating.

Separation Distance as a Calculation Output

With the necessary site specific assessment inputs and using the AS 3959:2018 bushfire modelling equations, the range of separation distances that will correspond to each BAL rating (each of which represents a range of radiant heat flux), can be calculated. This has application for bushfire planning scenarios such as:

- When the separation distance cannot be measured because the exact location of the exposed element (i.e., the building, structure or area), relative to classified vegetation, is yet to be determined.

  In this scenario, the required information is the identification of building locations onsite that will correspond to each BAL rating. That is, indicative BAL ratings can be derived for a variety of potential building/structure locations; or

- The separation distance is known for a given building, structure or area (and a determined BAL rating can be derived), but additional information is required regarding the exposure levels (to the transfer of radiant heat from a bushfire), of buildings or persons, that will exist at different points within the subject site.

The calculated range of separation distances corresponding to each BAL rating can be presented in a table and/or illustrated as a BAL Contour Map – whichever is determined to best fit the purpose of the assessment.

For additional information refer to the information boxes in Section 3 'Bushfire Attack Levels (BAL) - Understanding the Results and Section 3.2. 'Interpretation of the BAL Contour Map'.

SITE ASSESSMENT DETAILS - EXPLANATION & JUSTIFICATION

For the subject development/use the applicable separation distances values are derived from calculations applying the assessed site data. They are an output value, not an input value and therefore are not presented or justified in this appendix.

The derived values are presented in Section 3, Table 3.1 and illustrated as a BAL contour map in Figure 3.2.

A2: BAL Assessment Inputs Applied Using the Method 2 Procedure

STATING AND JUSTIFYING THE METHOD 2 CALCULATION INPUT VARIABLES APPLIED

As 3959:2018 Bal Determination Procedures: AS 3959:2018 establishes the official methodology to determine the radiant heat flux (RHF) a receiver (e.g., a building, structure, person or specified location), will potentially be exposed to from a fully developed bushfire within any adjacent classified vegetation. The methodology accounts for the configuration of a specific site and its surrounds.

The model calculations are complex. Consequently, AS 3959:2018 establishes two pathways to apply the methodology - a simplified procedure (Method 1) and a detailed procedure (Method 2).

Method 1: This procedure has limitations to both its scope and the degree to which site specific conditions can be applied. However, it requires minimal site assessment inputs and provides a standardised output that is satisfactory for many situations.

A moderate level of justification for some of the assessed inputs applied is required. This will demonstrate how the procedure detailed within AS 3959:2018 for Method 1(Section 2) has been followed.

Method 2: This procedure is used when the site conditions are out of the scope of Method 1 or when it is necessary to produce a more specific result. Higher levels of justification will be required for many of the input variables that are able to be modified using Method 2 (AS 3959:2018 Appendix B).

Section A2.1 below identifies the input variables that have been assessed for the proposed development and indicates the level of justification required for their application. The information contained within this Appendix will provide this justification information to the degree necessary.

A2.1: SUMMARY OF CALCULATION INPUTS APPLIED AND THE LEVEL OF JUSTIFICATION REQUIRED

AS 3959:2018 BUSHFIRE ATTACK LEVEL (BAL) DETERMINATION PROCEDURES INPUT VARIABLES FOR THE FIRE BEHAVIOUR AND RADIATION MODELS						
✓	Indicates which site specific variables have been assessed and applied to the assessment of the proposed development/use.	**IDENTIFICATION OF THE CALCULATION INPUT VARIABLES ASSESSED AND/OR MODIFIED FOR THE PROPOSED DEVELOPMENT/USE**				
	Indicates an AS 3959 methodology or jurisdiction default variable (or a methodology calculated variable in the case of EOR or flame angle). No justification required.					
	Indicates a variable that either must or can have an assessor value applied. Requires justification.					
	Indicates a variable that can have an assessor value applied. Requires detailed justification.	Using Method 1		Using Method 2		
ASSESSOR QUALIFICATION REQUIRED [1]		BPAD Level 1		BPAD Level 3		
LEVEL OF JUSTIFICATION REQUIRED TO APPLY [2]		None	Moderate	None	Moderate	High
Fire weather	Fire danger index (FDI/FFDI/GFDI)	✓		✓		
	Wind speed					
	Ambient temperature					
	Relative humidity					
Bushfire Prone Vegetation and slope of the land it grows on	Vegetation classification [3]		✓		✓	
	Effective slope		✓		✓	
	Understorey and total fuel loads [4]					
	Vegetation height				✓	
	Fuel age					
	Fuel moisture					
Receiver (building) positioning parameters	Site slope				✓	
	Separation distance		✓		✓	
	Elevation of the receiver (EOR).					
Bushfire flame parameters	Flame temperature [5]			✓		
	Flame width					
	Flame angle					
	Flame emissivity					
	Heat of combustion					
INTERMEDIATE OUTPUT FROM THE FIRE BEHAVIOUR AND RADIATION MODELS						
Rate of Spread - derived from fuel loads, fuel type, fuel height, FDI, effective slope and wind speed.						
Fire Intensity – derived from fuel loads, rate of spread and heat of combustion [6]						
Path Length – derived from flame angle and separation distance.						
Transmittance – derived from ambient temperature and relative humidity.						
View Factor – derived from flame length, flame width, flame angle, separation distance, elevation of receiver and site slope.						
FINAL OUTPUT OF THE FIRE BEHAVIOUR AND RADIATION MODELS						
Flame Length – derived from fuel loads, ROS (for Forest, Woodland) and fire intensity (for Scrub, Shrubland, Grassland) [6]						
Radiant Heat Flux and the Corresponding Bushfire Attack Level (BAL) – derived from view factor, flame emissivity, flame temperature, transmittance and corresponding to the worst possible flame angle.						
TABLE NOTES (see next page)						

[1] **Authority to Use Method 2:** Within WA, use of this procedure is restricted to bushfire practitioners who hold the BPAD Level 3 accreditation as issued by the Fire Protection Association Australia (FPAA) through their Bushfire Planning and Design Accreditation Scheme (BPAD Scheme) that complies with the Western Australian Bushfire Accreditation Framework.

[2] **Level of Justification Required in Applying Method 2:** AS 3959:2018 Appendix B establishes the detailed procedure for the Method 2 determination of BAL(s) as consisting of 10 steps. When justification is required for an assessed variable value to be applied, the required level of justification can vary. The level definitions used in this table are:

Moderate: Requires the provision of readily available and understood argument and evidence such as when:

1. The methodology step requires or allows for an input variable to be a site assessed value; or
2. A methodology step requires a jurisdictionally determined value which the relevant authority may change for different land use scenarios; or

High: Requires a detailed argument, appropriate evidence and justification when:

1. The variable is derived from the methodology step that applies an AS 3959:2018 default value or determines an intermediate output value (i.e. the result of applying a step's equations).

[3] **Applying a Different Vegetation Classification:** This approach may be justified when certain characteristics of the site's local vegetation complex align with the broad based descriptions of AS 3959:2018, but expert knowledge identifies characteristics that would result in the applied AS 3959 bushfire behaviour model not being properly representative of a fire in the local vegetation. This potential outcome is in part due to the ecological classification of vegetation that is used in AS 3959 rather than a classification more aligned with fuel structure/fire behaviour.

The justification of using a different classification is predicated on the fact that the intent of classifying vegetation in the BAL determination methodology of AS 3959:2018, is to identify the most appropriate fire behaviour model equations to apply.

For example, with respect to contribution to potential fire behaviour, it is often more important to consider vegetation structure rather than canopy cover, yet canopy cover is a key classification factor applied in AS 3959:2018.

Also findings from more recent bushfire behaviour research is not yet incorporated into the current version of the Standard. Certain currently applied bushfire behaviour models within As 3959:2018 are outdated and may under or over predict radiant heat flux and flame length.

[4] **Modifying Fuel Loads:** Potential steady state maximum fuel loads at a specific site for a given vegetation classification may vary significantly (above and below) from those that are to be applied as the default values in AS 3959:2018.

The Standard only provides the single set of ecological descriptors and corresponding fuel loads that are to be applied to vegetation complexes across Australia, hence its accuracy for all situations will be questionable. The relevant authority for a jurisdiction can establish different fuel loads to be applied.

However, fuel loads for the purposes of determining expected fire behaviour have not currently been determined to the degree necessary in WA, which results in the default values both over and underestimating fuel loads for WA vegetation types. WA DFES in providing advice to decision makers, will currently not accept any assessment and subsequent variation of the default fuel loads. If any variation was to be applied in an assessment, it would need to be argued for based on appropriate evidence and the development of a merit based case to the satisfaction of the decision maker.

The one circumstance where Bushfire Prone Planning will reduce fuel loads is in the calculations associated with a short fire run in forest type vegetation – in which the developing fire will not crown. Therefore, most bark and all canopy fuels can justifiably be excluded from total fuel load.

Note [5] - Flame Temperature: The Guidelines (DPLH, November 2024) establish the requirement to apply 1200 K as the flame temperature to determine an on-site shelter's maximum exposure to radiant heat flux and the corresponding vegetation separation distance, when an on-site shelter is required for vulnerable land use proposals (refer to Guidelines, Appendix B5.2.3 and BPC 8, A2.5). The requirement refers to the guidance presented in the ABCB Design and Construction of Community Bushfire Refuges Handbook 2014 to support the requirement.

Note [6] – Fireline Intensity and Flame Length: These values are determined as intermediate and final outputs of the AS 3959:2018 modelling. Changing these values would not be a valid use of the methodology for a fully developed fire. However, for the circumstance of a developing fire in small patches or corridors of vegetation, there may be justification when an authoritative source is identified to provide an override value.

A2.2: FLAME TEMPERATURE

FLAME TEMPERATURE APPLIED

ESTABLISHED BY AS 3959:2018

The AS 3959:2018 radiation modelling assumes an effective flame temperature of 1090 K and that it is sustained for a 2 minute period over a fire front width of 100 m. It states that instantaneous flame temperature may peak above 1090 K (AS 3959:2018 Table B1, clause B2 and clause 1.5.17).

Existing scientific literature suggests that flame temperatures for determining flame emissive power vary greatly and the majority fall between 1000 K and 1200 K. An appropriate flame temperature is chosen from this range in accordance with the minimum level of stringency or safety required by the relevant authority having jurisdiction (AS 3959:2018, CB10.2).

ESTABLISHED BY THE GUIDELINES

The Guidelines (DPLH, November 2024) establish the requirement to apply 1200 K as the flame temperature to determine an on-site shelter's maximum exposure to radiant heat flux and the corresponding vegetation separation distance, when an on-site shelter is required for vulnerable land use proposals (refer to Guidelines, Appendix B5.2.3 and BPC 8, A2.5). The requirement refers to the guidance presented in the ABCB Design and Construction of Community Bushfire Refuges Handbook 2014 to support the application of 1200 K.

Relevant Site	Relevant Vegetation		Flame Temperature Applied (Kelvin)	Explanation and Justification
	Area	Class		
43 Horse Hill Road Onsite Shelter	1	(C) Shrubland	1200 K	The requirement to apply 1200 K rather than 1090 K as the flame temperature, is established by the Guidelines (refer to the information above).
	2	(D) Scrub		
	3	(D) Scrub		

A2.3: SITE SLOPE

SITE SLOPE
DETERMINING
Site slope is the 'line of sight' slope between the 'site' and the edge of the relevant area of classified vegetation (AS 3959:2018 clause B5). The 'site' being "the part of the allotment of land on which a building stands or is to be erected" (AS 3959:2018 clause 1.5.30). That is, it is the straight line slope that ignores any changes in slope or any other physical obstructions between these two points. The slope direction is considered from the receiver to the vegetation with upslope entered as negative degrees and downslope as positive degrees.
PURPOSE
Site slope is applied to position the potential receiver of radiant heat (typically a structure) relative to the modelled bushfire (the radiant heat panel as a black body of evenly distributed heat) at the edge of the vegetation. This enables the use of the view factor radiant heat model in the AS 3959:2018 BAL determination methodology, to calculate of the level of radiant heat that will potentially flow from the bushfire to the structure.
SLOPE LIMITS
AS 3959:2018 clause B1 limits site slope to 20^0 but explains that this limitation due to the considered impracticality of maintaining relevant vegetation in a low threat state in perpetuity on steeper slopes. This is likely to result in an inability to maintain the assessed separation distance between the building and the classified vegetation. Consequently, where the maintenance of vegetation is not a limiting factor, the application of a greater site slope can be justified to position the building relative to the bushfire more accurately.
AS 3959:2018 METHOD 1 AND METHOD 2 – DIFFERENCES IN APPLYING SITE SLOPE
Method 2 allows for the input of the site slope as the actual measured or calculated slope (not a range or the highest value of a range), that exists for the subject site. The slope can be upslope (entered as negative degrees), flat or downslope (entered as positive degrees). This differs from the Method 1 procedure for which site slope is not independent of effective slope and assumes the site slope to be the same as the effective slope that is applied (i.e., zero, 5, 10, 15 or 20 degrees, as applicable).

SITE SLOPE APPLIED – USING THE METHOD 1 PROCEDURE IN A METHOD 2 CALCULATOR

APPLIED FOR THE PURPOSE OF DETERMINING A REQUIRED SEPARATION DISTANCE

For the proposed building work/development, the following information is required:

- The determination of the separation distance required to limit radiant heat exposure of persons to 2 kW/m^2; and/or
- The determination of the separation distance required to limit radiant heat exposure of a structure to 10 kW/m^2.

LIMITATIONS OF THE AS 3959:2018 METHOD 1 CALCULATOR

Method 1 calculators typically do not provide the required information. The limitations are:

- The only output displayed is a BAL rating and each rating corresponds to a range of radiant heat flux, not single values; and
- The separation distance corresponding to a single radiant heat flux value is not determined or displayed.

USING A METHOD 2 CALCULATOR TO APPLY THE METHOD 1 PROCEDURE

The above limitations necessitate the use of a Method 2 calculator to derive the required separation distances. However, in only applying the Method 1 procedure the site specific calculator input variables are restricted to the following:

- Fire Danger Index;
- Vegetation classification;
- Effective slope as zero degrees for upslope and flat land, otherwise 5, 10, 15 or 20 degrees, as applicable and in accordance with AS 3959:2018 Table 2.5; and
- Site slope values will be the same as those applied to the effective slope.

Refer to the copies of the calculator inputs/outputs to confirm the application of the Method 1 procedure.

Relevant Site	Relevant Vegetation		Applied Effective Slope (Method 1)	Applied Site Slope (Method 1)
	Area	Class		
43 Horse Hill Road Onsite Shelter	1	(C) Shrubland	N/A	N/A
	2	(D) Scrub	Downslope 5 degrees	Downslope 5 degrees
	3	(D) Scrub	Upslope/Flat 0 degrees	Upslope/Flat 0 degrees

A3: BAL Calculator – Copy of Input/Output Values

DETERMINING 10 kW/m² SEPARATION DISTANCES

Vegetation Area 2

FLAMESOL
FPA AUSTRALIA

Calculated January 13, 2026, 7:10 pm (MDc v.4.9)

Minimum Distance Calculator - AS3959-2018 (Method 2)			
Inputs		Outputs	
Fire Danger Index	80	Rate of spread	5.88 km/h
Vegetation Classification	Scrub	Flame length	13.62 m
Understorey fuel load	25 t/ha	Flame angle	69 °, 75 °, 80 °, 83 °, 84 ° & 89 °
Total fuel load	25 t/ha	Elevation of receiver	4.97 m, 4.73 m, 4.05 m, 3.1 m, 2.49 m & 0 m
Vegetation height	m	Fire intensity	75,987 kW/m
Effective slope	5 °	Transmissivity	0.859, 0.84, 0.8149999999999999, 0.792, 0.78 & 0.726
Site slope	5 °	Viewfactor	0.4146, 0.3085, 0.208, 0.1408, 0.1143 & 0.0307
Flame width	100 m	Minimum distance to < 40 kW/m²	15.7 m
Windspeed	45 km/h	Minimum distance to < 29 kW/m²	21.1 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	30.3 m
Flame temperature	1,200 K	Minimum distance to < 12.5 kW/m²	41.8 m
		Minimum distance to < 10 kW/m²	48.9 m

Rate of Spread - Catchpole et al. 1998

Flame length - Byram, 1959

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005

Vegetation Area 3

FLAMESOL
FPA AUSTRALIA

Calculated January 13, 2026, 7:13 pm (MDc v.4.9)

Minimum Distance Calculator - AS3959-2018 (Method 2)			
Inputs		Outputs	
Fire Danger Index	80	Rate of spread	4.16 km/h
Vegetation Classification	Scrub	Flame length	11.62 m
Understorey fuel load	25 t/ha	Flame angle	65 °, 71 °, 76 °, 79 °, 80 ° & 84 °
Total fuel load	25 t/ha	Elevation of receiver	5.26 m, 5.49 m, 5.64 m, 5.7 m, 5.72 m & 5.78 m
Vegetation height	m	Fire intensity	53,815 kW/m
Effective slope	0 °	Transmissivity	0.865, 0.848, 0.824, 0.8, 0.788 & 0.732
Site slope	0 °	Viewfactor	0.413, 0.3045, 0.2058, 0.1396, 0.1134 & 0.0304
Flame width	100 m	Minimum distance to < 40 kW/m²	13.9 m
Windspeed	45 km/h	Minimum distance to < 29 kW/m²	18.7 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	27 m
Flame temperature	1,200 K	Minimum distance to < 12.5 kW/m²	37.5 m
		Minimum distance to < 10 kW/m²	44.1 m

Rate of Spread - Catchpole et al. 1998

Flame length - Byram, 1959

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005

APPENDIX B: GUIDANCE – BUSHFIRE ATTACK LEVELS AND ASSET PROTECTION ZONES

B1: Understanding Bushfire Attack Level (BAL) Ratings

BUSHFIRE ATTACK LEVEL

IMPORTANT

It is not the purpose of this 'planning' BMP to derive a 'determined' BAL rating (and associated minimum APZ dimensions), that will apply to an existing or future habitable or specified building, for the purpose of establishing its bushfire resistant construction requirements in accordance with the Building Code of Australia (contained in the NCC).

However, in limited situations a 'determined' BAL can be an incidental outcome of the planning assessment.

BUSHFIRE ATTACK LEVEL (BAL)

The potential transfer (flux/flow) of radiant heat from a bushfire to a receiving object is measured in kW/m^2. The AS 3959:2018 Bushfire Attack Level (BAL) determination methodology establishes the ranges of radiant heat flux that correspond to each bushfire attack level.

These ranges of radiant heat transfer are titled BAL-LOW, BAL-12.5, BAL-19, BAL-29, BAL-40 and BAL-FZ.

For certain classes of building/structure the bushfire performance requirements and the associated deemed to satisfy solutions are established by the Building Code of Australia (Vol. 1 & 2 of the NCC). For most jurisdictions the relevant building classes are 1, 2, 3, 9 and associated 10a.

The assessed BAL rating that applies to a specific building/structure determines the bushfire resistant construction requirements for those works in accordance with AS 3959:2018 - *Construction of buildings in bushfire prone areas,* or for Class 1 buildings, the NASH Standard – *Steel framed construction in bushfire areas (NS 300 2021),* as the recognised deemed to satisfy solutions.

DETERMINED BAL RATINGS

A BAL can only be classed as 'determined' and therefore apply to an existing or future building/structure when:

1. The building/structure final design and position on the lot are known and the stated separation distance from classified bushfire prone vegetation exists and can justifiably be expected to remain in perpetuity; or
2. The building/structure will always remain subject to the same BAL regardless of:
    (a) The retention of all existing classified vegetation either onsite or offsite; and
    (b) Its design or position on the lot - including, as relevant and necessary, accounting for any regulatory or enforceable building setbacks from lot boundaries (i.e. R-codes, restrictive covenants and defined building envelopes).

Consequently, a BAL Certificate may be able to be issued for a BAL stated in the BMP when it can be considered 'determined'. However, this is not the typical outcome but an incidental one.

If the BMP can derive determined BAL(s), the BAL Certificate(s) required for submission with building applications could potentially be provided, using the BMP as the supporting assessment data.

INDICATIVE AND CONDITIONAL BAL RATINGS

An 'Indicative BAL' indicates the highest BAL rating that exists for the applied set of parameters that have been applied to the site's assessment. Because the potential remains for these parameters to be varied, they are unable to be considered a 'determined' BAL.

A 'Conditional BAL' establishes the BAL rating that will be considered as a 'Determined BAL' once the stated requirements (i.e. the conditions), which may require approval by the relevant authority, are implemented and subsequently confirmed as being met.

Relevant conditions that may need to be met include:

- The location of future development sites being identified accurately and/or modified; and/or
- Classified vegetation being modified or removed (after obtaining any required approvals from the relevant authority), to establish the required vegetation separation distances.

A BAL Certificate cannot be issued for an indicative or conditional BAL rating – only for a 'Determined BAL'.

BAL RATINGS FOR BUILDING VERSUS PLANNING PURPOSES – ASSESSMENT & REPORTING REQUIREMENTS ARE DIFFERENT

Building Permit Applications

The relevant requirements are established in accordance with the WA Building Act 2011 and Building Regulations 2012 which reference the application of the Building Code of Australia (within the National Construction Code).

The required BAL rating is a 'determined' BAL rating (stated on a BAL Certificate) and supported by the requisite assessment details. Typically, this will be a Bushfire Attack Level (BAL) Report produced specifically for this purpose.

The required supporting assessment information may be derived from a Bushfire Management Plan (BMP) when a 'determined' BAL can be derived for a planning proposal. This is possible when the specific conditions discussed under 'Determined BAL Ratings' above, can be met, as an incidental outcome.

Planning Proposal Applications

The relevant requirements are established in accordance with the Planning and Development Act 2005, LPS Regulations 2015, SPP 3.7 Bushfire and the associated Guidelines.

To comply with the relevant acceptable solutions contained in the Guidelines, the subject planning proposal must demonstrate that the required minimum sized asset protection zone (APZ) - subject to location constraints and allowances established by the Guidelines - can be installed surrounding a habitable or specified building.

The minimum dimensions are those that ensure the potential radiant heat impact on the relevant buildings does not exceed 29 kW/m^2 from fire in any surrounding types of classified vegetation. This is the upper limit of the range of radiant heat flux corresponding to the BAL-29 rating.

Consequently, the BAL ratings identified in a Bushfire Management Plan (BMP) only need to be 'indicative' - although 'determined' ratings may be derived as an incidental outcome when relevant conditions are met (discussed under 'Determined BAL Ratings' above).

The indicative BAL-29 dimensioned APZ is not necessarily the APZ that will be required to be implemented and maintained surrounding any subject building/structure that exists as per an approved planning proposal. Refer to Appendix B3 in this BMP for additional information.

B2: BAL Contour Map Interpretation

THE BAL CONTOUR MAP

The Bushfire Attack Level (BAL) contour map is a diagrammatic representation of the outcome of the bushfire attack level assessment that has been conducted.

The map presents six shaded radiant heat contours extending out from each area of classified vegetation. Each coloured contour represents a different BAL rating (BAL-LOW, BAL-12.5, BAL-19, BAL-29, BAL-40 and BAL-FZ) and corresponds to a set range of potential radiant heat transfer (kW/m^2), in accordance with AS 3959:2018 BAL determination methodology.

The highest BAL rating contour that an exposed element (building, person or other defined element), is partly or fully located within, is the BAL rating that will apply to that element.

The width of each BAL contour:

- Will vary dependent on the BAL rating it represents; and
- The assessed potential bushfire behaviour that considers site specific vegetation types, fuel loads, ground slopes and fire weather; and
- Represents the minimum and maximum vegetation separation distances corresponding to the BAL rating it represents.

For 'post development' BAL contour maps, the areas of classified vegetation applied to the production of the BAL contours, are those that will remain at the intended end state of the subject development once earthworks, clearing and/or landscaping and/or re-vegetation have been completed.

IMPORTANT

A BAL contour map is typically constructed for planning assessment and application purposes rather than building permit application purposes.

The BAL ratings identified from a BAL contour map will likely only be 'indicative' of what can be achieved – with planning compliance for this factor being satisfied when BAL-29 is indicated.

However, future building works require a 'determined' BAL rating for building permit applications and a BAL Certificate. The required 'determined' BAL rating is not necessarily able to be derived from the BAL contour map. There are only limited scenarios where this is possible. Refer to Appendix B1 and B3 for additional information.

Consequently, a subsequent assessment of the site data and associated report for building application purposes may be required to determine the BAL rating that is to apply for building purposes. Note: If approval from the relevant authority needs to be obtained for native vegetation modification and/or removal this also establishes that a subsequent assessment and report will be required.

B3: The Asset Protection Zone (APZ)

THE APZ – DESCRIPTION, TECHNICAL REQUIREMENTS AND DIMENSIONS

DESCRIPTION AND PURPOSE

An asset protection zone (APZ) is an area surrounding a habitable or specified building that is:

- Not vegetated; and/or
- Supports retained or planted vegetation that can be considered to present a low bushfire threat as a result of;
    - Low flammability and/or higher moisture content characteristics; and/or
    - Minimal fuel loads (either naturally or as a result of continual maintenance).

The primary objectives of establishing an APZ are:

1. To ensure a reduction in the exposure of the building/structure to the bushfire direct attack mechanisms (threats) of flame contact, radiant heat transfer and ember attack, by establishing appropriate separation distances from each identified area of classified vegetation.

   These distances are measured from the nearest part of an external wall and/or the supporting posts of building parts without external walls; and
2. To ensure a reduction in the exposure of the building/structure to bushfire indirect attack mechanisms (threats) by:
    - Preventing surface fire spreading to the building/structure;
    - Minimising the potential for tree strike that can decrease building/structure resilience to bushfire direct attack mechanisms; and
    - Limiting the potential for consequential fires to impact the building/structure by eliminating, reducing, moving away and/or shielding consequential fire fuels.

      These fuels include accumulated debris, stored combustible/flammable items and constructed combustible items. Note that consequential fire, typically ignited by embers, is the primary cause of building loss in a bushfire event; and
3. To provide a defendable space for firefighting activities.

TECHNICAL REQUIREMENTS

Established by the Guidelines

The relevant technical requirements for an APZ are established in the Planning for Bushfire Guidelines (DPLH/WAPC) (as amended), Appendix B2: Siting and design and available online at Planning WA - SPP 3.7 Bushfire

Established by the Relevant Local Government

Certain LGA may state technical requirements to be complied with that vary from and/or are additional to those established by the Guidelines.

Refer to the notice issued annually by the relevant local government under s33 of the Bushfires Act 1954 (e.g. Bushfire Risk Reduction Notice or Firebreak and Hazard Reduction Notice etc). These technical requirements may also be established by their gazetted local planning scheme. Refer to the ratepayer notice and/or the local government's website for the current version.

Information Published by the Bushfire Centre of Excellence (DFES)

The book titled Firewise Gardening in Western Australia (2024), is a good source of relevant information and is available online at https://dfes.wa.gov.au/hazard-information/bushfire/bcoe#bushfire-resources.

DIMENSIONS

The dimensions of the APZ that will be the responsibility of a landowner to implement and/or maintain around a habitable or specified building/structure, are stated as the separation distances between these buildings and each identified area of classified vegetation. These distances will be site specific and dependant on variables which include:

- The potential bushfire behaviour in the identified vegetation which is dependent on factors including vegetation types, fuel loads, ground slopes and fire weather;
- The intended use of the site, with vulnerable uses requiring greater safety margins; and
- The constructed bushfire resistance of the subject building/structure (typically corresponding to a BAL rating or kW/m^2 level of radiant heat exposure).

Dimensions Established by the BAL Rating of the Subject Building/Structure

These minimum separation distances, to be installed and maintained, correspond to a 'determined' BAL rating and align the building's applied level of bushfire resistant construction to its potential level of exposure to flames, radiant heat and embers from the bushfire (note: this will not account for any exposure from significant consequential fires closer to the building).

The dimensions should be stated within a Bushfire Attack Level Report (BAL Report) produced for building application purposes. They may also be identified in an associated Bushfire Management Plan (BMP) produced for planning application purposes.

Dimensions Established by the Guidelines, DPLH/WAPC for an On-site Shelter for a Vulnerable Tourism Land Use

For the stated specific use, the Guidelines specify the maximum level of radiant heat exposure allowed. Consequently, the BMP produced for planning application purposes will state the minimum distances that are to be installed and maintained.

> *Note: Other than for the above use, the Guidelines do not establish the dimensions of the APZ for other buildings/structures that must be installed. They only establish that at least a BAL-29 dimensioned APZ should be the minimum that is installed and ensures that this is possible for the subject planning proposal. Consequently, the BMP can only indicate the separation distances corresponding to different levels of radiant heat exposure. Refer also to Appendix B1 in this BMP.*

Dimensions Established by this BMP

The required dimensions may be identified in this BMP when specific increased separation distances have been applied through the application of an outcomes-based assessment that requires this as an additional protection measure.

Dimensions Established by the BCA (NCC 2022) for Certain Class 9 Vulnerable Use Buildings

These separation distances are stated in the BCA in Specification 43 as either:

- Not less than the minimum distances specified in Table S43C2; or
- Those corresponding to radiant heat flux on exposed building elements not exceeding 10kW/m^2 from a justified design bushfire analysis; or
- Those justified as an outcome of a building performance solution.

The separation distances may be included in the BMP by the bushfire practitioner as additional information to inform proponents and decision makers. They are not addressed by the Guidelines and therefore not a required part of the bushfire assessments presented within a BMP for planning application purposes.

Dimensions Established by a Local Government

To satisfy certain local government requirements, required APZ dimensions may be stated in the notice issued annually by the relevant local government under s.33 of the Bushfires Act 1954. These may be greater than the dimensions applied by the above mechanisms. A maximum APZ dimension could also be applied by the LGA.

These separation distances may be included in the BMP for informative purposes, but they are not a requirement for a BMP submitted for planning application purposes in accordance with the Guidelines.

B4: Vegetation Excluded from Classification – Ensure Continued Low Threat Status

MAINTAINING THE LOW THREAT STATUS OF EXCLUDED VEGETATION

When applying AS 3959:2018 BAL determination methodology, vegetation adjoining or adjacent to the subject site can be excluded from classification based on being a 'low bushfire threat'. To maintain this status, certain requirements must continue to be met in accordance with the below extract from AS3959:2018. Refer to the 'Classified Vegetation and Topography Map' for the relevant low threat areas associated with the subject site.

Determination of 'low threat' vegetation is based on factors such as - proximity to the subject site / small areas of vegetation / low flammability / higher moisture content / low fuel load.

Aside from a naturally occurring low fuel load, vegetation maintained in a minimal fuel condition through active management can be excluded. The associated key requisite is that the active management can be expected to continue in perpetuity, and this can be adequately justified.

Acceptable forms of justification typically involve supportable evidence or the existence of an enforceable mechanism. Examples of enforceable mechanisms include:

- Requirements established by a Section 33 (Bush Fires Act 1954) notice issued by a local government;
- An appropriate and enforceable agreement between relevant parties (which may involve additions to land titles); and
- For public open space or crown land, written evidence that the land manager e.g. local government or a State Government department, agrees to maintain the designated area of land in a low threat state in perpetuity.

2.2.3.2 *Exclusions—Low threat vegetation and non-vegetated areas*

The following vegetation shall be excluded from a BAL assessment:

(a) Vegetation of any type that is more than 100 m from the site.

(b) Single areas of vegetation less than 1 ha in area and not within 100 m of other areas of vegetation being classified vegetation.

(c) Multiple areas of vegetation less than 0.25 ha in area and not within 20 m of the site, or each other or of other areas of vegetation being classified vegetation.

(d) Strips of vegetation less than 20 m in width (measured perpendicular to the elevation exposed to the strip of vegetation) regardless of length and not within 20 m of the site or each other, or other areas of vegetation being classified vegetation.

(e) Non-vegetated areas, that is, areas permanently cleared of vegetation, including waterways, exposed beaches, roads, footpaths, buildings and rocky outcrops.

(f) Vegetation regarded as low threat due to factors such as flammability, moisture content or fuel load. This includes grassland managed in a minimal fuel condition, mangroves and other saline wetlands, maintained lawns, golf courses (such as playing areas and fairways), maintained public reserves and parklands, sporting fields, vineyards, orchards, banana plantations, market gardens (and other non-curing crops), cultivated gardens, commercial nurseries, nature strips and windbreaks.

NOTES:

1 Minimal fuel condition means there is insufficient fuel available to significantly increase the severity of the bushfire attack (recognizable as short-cropped grass for example, to a nominal height of 100 mm).

2 A windbreak is considered a single row of trees used as a screen or to reduce the effect of wind on the leeward side of the trees.

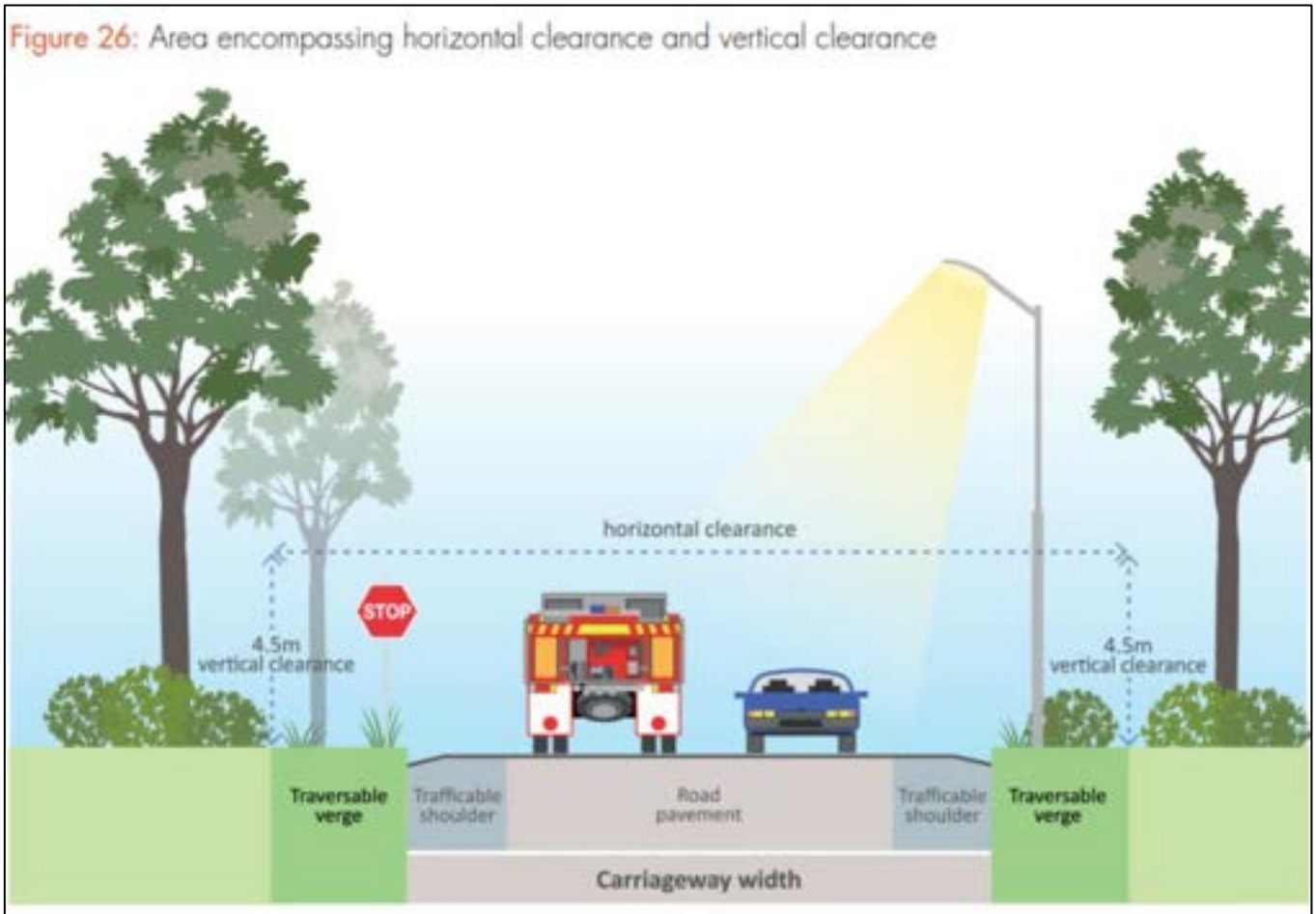
APPENDIX C: GUIDANCE - TECHNICAL REQUIREMENTS FOR VEHICULAR ACCESS

The relevant technical requirements are established in the Planning for Bushfire Guidelines (DPLH/WAPC) (as amended), Appendix B3: Vehicular access and available online at Planning WA - SPP 3.7 Bushfire

The following excerpts are presented here as a quick reference to applicable terminology and design requirements applied in the assessment against the bushfire protection criteria, Element 3: Vehicular access in this BMP.

C1: Road Component Terminology

Figure 26: Area encompassing horizontal clearance and vertical clearance



Horizontal clearance: The carriageway width (including the road pavement and trafficable shoulder) and traversable verge that provides for the movement and parking of vehicles and area required by emergency services to operate. Infrastructure and vegetation within the traversable verge should be frangible, however, non-frangible items can occur providing they do not restrict vehicular movement in the event of an emergency.

C2: Vehicular Access Technical Requirements

Table 10: Vehicular access technical requirements

	1		2		3		4		5	
TECHNICAL REQUIREMENTS	**PERIMETER ROADS**		**PUBLIC ROADS**		**EMERGENCY ACCESS WAY[3]**		**FIRE SERVICE ACCESS ROUTE[3]**		**BATTLE-AXE & PRIVATE DRIVEWAYS[1]**	
MAP OF BUSH FIRE PRONE AREAS DESIGNATION	**Area 2**	**Area 1**	**Area 2**	**Area 1**	**Area 2**	**Area 1**	**Area 2**	**Area 1**	**Area 2**	**Area 1**
Minimum horizontal clearance (metres)	12	8	See note 5		10	6	10	6	6	
Minimum vertical clearance (metres)	4.5									
Minimum weight capacity (tonnes)	15									
Maximum grade unsealed road[2]	See note 5		See note 5		1:10 (10% or 6°)					
Maximum grade sealed road[2,4]					1:7 (14.3% or 8°)					
Maximum average grade sealed road					1:10 (10% or 6°)					
Minimum inner radius of road curves (metres)					8.5					

Notes:

[1] Driveways and battle-axe legs to comply with the Residential Design Codes and Development Control Policy 2.2 Residential Subdivision where not required to comply with the widths in this Appendix or the Guidelines.

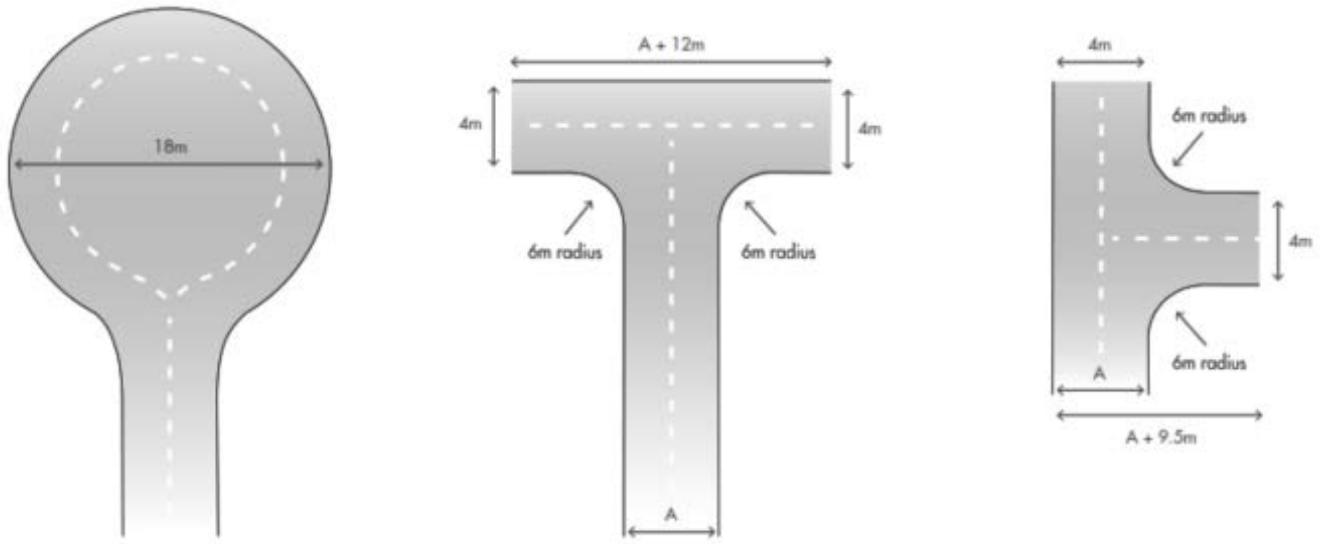
[2] Dips must have no more than a 1 in 8 (12.5% - 7.1 degrees) entry and exit angle.

[3] To have crossfalls between 3 per cent and 6 per cent.

[4] For sealed roads only the maximum grade of no more than 1 in 5 (20 per cent) (11.3 degrees) for no more than 50 metres is permissible, except for short constrictions to 3.5 metres for no more than 30 metres in length where an obstruction cannot be reasonably avoided or removed.

[5] As outlined in the Institute of **Public Works Engineering Australasia (IPWEA) subdivision guidelines, Liveable Neighbourhoods, Austroads Standards** Main Roads standard, supplement, policy or guideline and/or any applicable or relevant local government standard or policy.

Figure 30: Design requirements for a turn-around area



APPENDIX D: GUIDANCE - TECHNICAL REQUIREMENTS FOR FIREFIGHTING WATER SUPPLY

The relevant technical requirements are established in the Planning for Bushfire Guidelines (DPLH/WAPC) (as amended), Appendix B4: Water supply and available online at Planning WA - SPP 3.7 Bushfire

The information provided in this appendix is additional to that provided in the Guidelines. It includes:

- For reticulated water supply, the hydrant location specifications established by the WA Water Corporation (Design Standard DS 63), as dependant on land use type and relevant to bushfire planning assessments (highlighted). Note: the maximum distance from a hydrant to the rear of a lot/building is generally interpreted as not applicable to large lot sizes where the maximum distance becomes an impractical limitation i.e., typically rural residential areas; and
- Images of example installations of acceptable water supply tanks and outlet fittings.

D1: Hydrant Location in Reticulated Areas

2.2.1.5 Appurtenances

c. Hydrants

Hydrants shall be screw-down hydrant with built-in isolation valve and installed only on DN100 or larger pipes. Hydrants shall be located:

- so that the maximum distance between a hydrant and the rear of a building envelope, (or in the absence of a building envelope the rear of the lot) shall be 120m;
- so that spacing (as measured by hose-run) between hydrants in non-residential or mixed use areas shall be maximized and no greater than 100m;
- so that spacing (as measured by hose-run)between hydrants in residential areas with lots per dwelling <10,000m² shall be maximized and no greater than 200m;
- so that spacing between hydrants (as measured by hose-run) in rural residential areas where minimum lots per dwelling is >10,000 m² (1ha) shall be maximized and no greater than 400m;
- centrally along the frontage of a lot to avoid being under driveways, unless the lot features a frontage 6m or less, in which case it shall be placed to the side opposite the driveway;
- at lots that have the widest frontage in the local area;
- where appropriate at the truncation of road junctions or intersections so that they can serve more than one street and can be readily located;
- on both sides of the major roads at staggered intervals where there are mains on both sides of the road;
- at major intersections on dual multi-lane roads, where two hydrants are to be sited on diagonally opposite corners;
- hydrants should be located at least 20m from traffic calming devices i.e. median slow points or chokers, chicanes, mini traffic circles, and **intersection 'pop-outs' to ensure traffic is not** impeded;
- in a position not less than 10m from any high voltage main electrical distribution equipment such as transformers and distribution boards, liquefied petroleum gas or other combustible storage
- directly on top of the main using a tee unless proved to be impractical

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D2: Firefighting Water Supply - Tank and Fittings

DFES
Bushfire Centre of Excellence
TRAINING / KNOWLEDGE / ENGAGEMENT

Water tank connections for bushfire-prone areas (domestic and commercial)

Information Sheet, January 2025

This fact sheet provides information on how to best set up water supplies to assist firefighters on properties in bushfire-prone areas. It includes information on the siting, capacity, access and appropriate fittings needed for firefighters to access and use water supplies during an emergency.

Please note: if you are establishing water supplies to comply with planning requirements, you should read this fact sheet in conjunction with the *Planning for Bushfire Guidelines*, as well as relevant planning schemes or policies from your local government.



What fittings should I fit the water tank with?

All tanks for firefighting should be fitted with a 50 millimetres or 100 millimetres male camlock fitting. This fitting is readily available from most hardware and rural supply shops. DFES recommends a male camlock fitting, as it means there are no perishable washers or working parts to maintain.

The fitting should be controlled by a butterfly, ball or gate valve, as these can easily control flow.



Why do I need a water tank for bushfires on my property?

You may have a water tank dedicated to bushfires to make your property as resilient as possible, or it may be a formal requirement under relevant planning or building regulations.

A water tank dedicated to firefighting supports firefighters attempting to protect your property and other assets from bushfires. You should consider a dedicated water tank alongside other bushfire prevention and preparedness activities, such as managing bushfire fuels and having a bushfire plan.

Where should I site a water tank?

You should site water tanks on clear, level ground compacted to take the maximum weight of the tank when full.

The tank should also be in a low-fuel area with at least 3 metres cleared around it to prevent direct contact with flames.

The water tank must be accessible to firefighting appliances and include a suitable area for these to turn around. You can find more information on recommended minimum standards for access in the *firebreak construction guidelines*.

What capacity should the tank be?

The recommended minimum capacity for a firefighting water supply is 10,000 litres.

You may be using the tank for other purposes besides bushfire fighting, such as water for livestock or other rural purposes. However, it is recommended that a minimum of 10,000 litres is always available for firefighting.







Example Strategic 47,000 Litre Concrete Tank & Protected Fittings



Example 10,000 Litre Concrete Tank

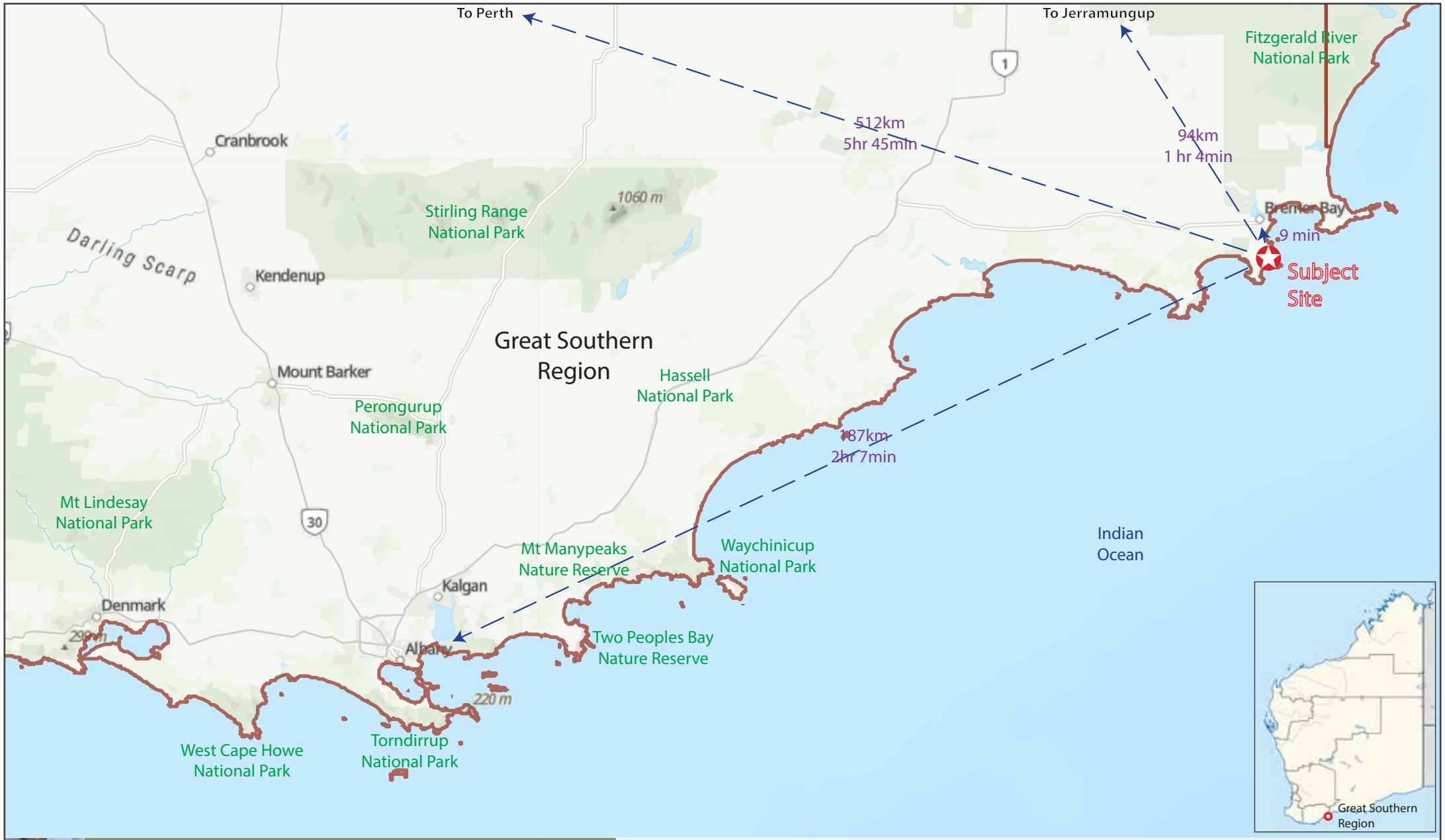


Example Storz and Camlock Couplings

Appendix D

Development Drawings

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0 0.8 2.0 2.4 4.0 4.8 6.0 8.0
Kilometres

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Rev. B - July 2026
Salt Cove Bremer Bay
No. 43 (Lot 112) Horse Hill Road, Bremer Bay
DA for Weddings & Accommodation – Appx.D1: Regional & District Plan
1:80k(A4)

No Restrictive Covenants, Caveats, or Easements for the Subject Site

Short Beach

Short Beach Rd

Indian Ocean

dwelling

Rural-Residential

Subject Site
Lot 112
100 acres

Rural

Reserve

Salt Cove

Pt Henry Rd

Horse Hill Rd

Pt Gordon Rd

Banky Beach

Point Gordon

10 60 70 80 90 30 40 50 20 MSL

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Tourism Council Western Australia · ECO STRUCTURES · nearmap · SALT COVE Bremer Bay

0 50 100 300 400 500 600 1000 Metres

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Rev. B - July 2026

Salt Cove Bremer Bay

No. 43 (Lot 112) Horse Hill Road, Bremer Bay

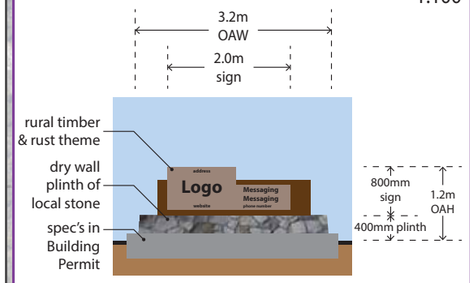
DA for Weddings & Accommodation – Appx.D2: Locality Plan

N

1:10k(A3)

ENTRY STATEMENTS

1:100



Entry Statement – Elevation

- Agg. 1.2m² signage
- Non-illuminated
- Locally sourced
- Not in verge

LEGEND

- Existing building or use
- Proposed building or use
- SB50 — Setback to Boundary (e.g. 50m)
- Gate, min. 3600W, unlocked (Not to Scale)
- Entry statement (NtS)
- Driveway, 2WD, 4000W / 6000W (limestone / gravel / sealed)
- Parking bay, 2600W / 4800W x 5500L x 58 (AS2890.1 B99 / AS1428.1 DA bays)
- Bus bay, 3500W x 12500L x 1
- Pedestrian path, 1200W / 1800W
- Water tank (NtS)
- Pergola, 3.6m x 3.6m

Lot 108
Lot 112
Lot 113
Lot 2
Lot 3
Lot 7
Dwelling
Shed
to Short Beach & emergency destinations
Magpie Rise
winter sun
extensive illegal clearing ~5ha (50%) of lot in 2025 by neighbour objecting to clearing, flora & fauna & dust
extended public road by neighbour without Shire approval
new dusty limestone driveway by neighbour objecting to dust
ridge
UG power
Kwongkan & Peppermints
1212.100m
shed
bushfire shelter
single house
mgt accom.
outdoor ceremonies
toilets
reception centre
portable marquee
workers accom.
5 x eco-tent tourist accom.
SB10
SB20
33m
93m
35m
47m
121m
44m
35m
152m
APZ 2024
60m
31m
35m
32m
42m
39m
draw
views
summer prevailing winds
Salt Cove
cove
Subject Site
No. 43
40 ha.
Horse Hill Rd
to main road & emergency destinations
OH power
1045m
service access
universal access unit
ancillary accom.
passing 6x20@200m
to Banky Beach & Pt Gordon
winter prevailing winds
347m
80
30
60
70

APPROVAL

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0 20 50 60 100 120 150 200 Metres

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Salt Cove Bremer Bay

No. 43 (Lot 112) Horse Hill Rd, Bremer Bay

DA for Weddings & Accommodation – Appx.D3: Master Plan

N

1:3k(A3)

Figure 3.1.1

Classified Vegetation & Topography (Post Dev)

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

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

- Subject Site
- Cadastral
- 100m Assessment Area
- 150m Assessment Area
- Driveways / Accessways
- Indicative Turning Circle
- Indicative Firefighting Water Tank
- Rainwater Tank
- 3-metre wide exclusion zone
- 10kW APZ
- BAL-29 APZ
- APZ Distance (m)

Existing Buildings

- House (Proposed check-in building)
- Shed (Proposed onsite shelter)

Proposed Buildings

- Worker's Accommodation
- Ancillary Dwelling
- Eco-tent
- Toilet block

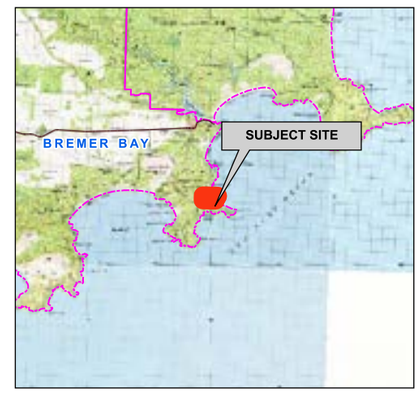
Post Veg

- Shrubland
- Scrub
- Excluded 2,2,3,2 (e)
- Excluded 2,2,3,2 (f)

0 20 40 60 80 100

Metres

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



AERIAL IMAGERY: Landgate/SLIP

Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 17-07-2026
SCALE (A3): 1 : 2400

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Figure 3.2

BAL Contour Map

Lot 112 on Plan 257537, Area : 40.4922 ha
43 Horse Hill Rd
BREMER BAY
SHIRE OF JERRAMUNGUP

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

- Subject Site
- Cadastral
- 100m Assessment Area
- Driveways / Accessways
- Indicative Turning Circle
- Indicative Firefighting Water Tank
- 3-metre wide exclusion zone
- 10kW APZ
- BAL-29 APZ
- APZ Distance (m)

Existing Buildings

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- Shed (Proposed onsite shelter)

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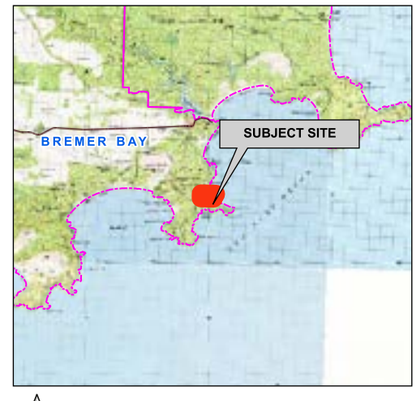
Bushfire Attack Levels

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

0 20 40 60 80 100

Metres

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

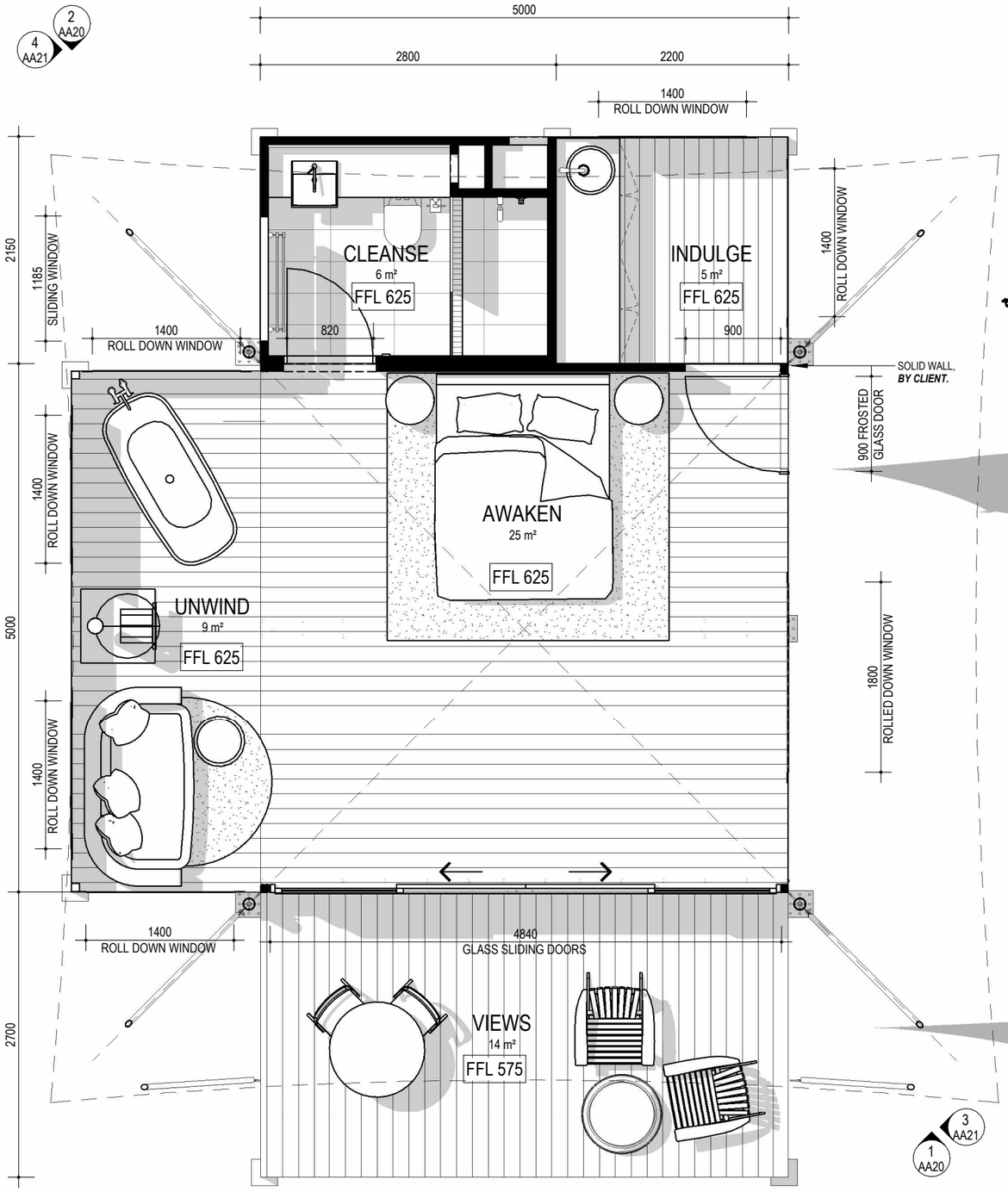


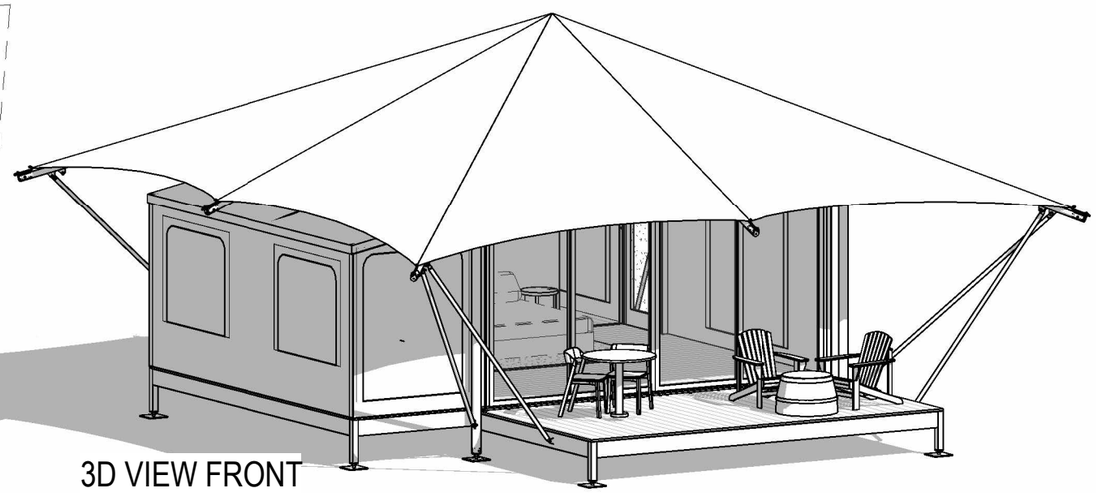
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Coordinate System: GDA 1994 MGA Zone 50
Projection: Universal Transverse Merctaor Units: Metre
Map by: Tessa 17-07-2026
SCALE (A3): 1 : 2200

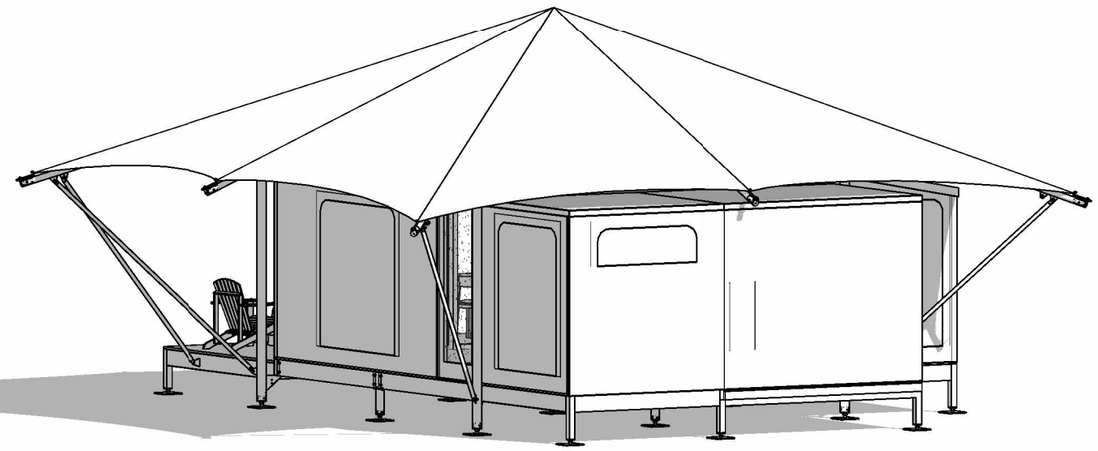
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3D VIEW FRONT



3D VIEW REAR

FLOOR PLAN

1 : 50

0 1000 2000 3000 mm

SCALE 1: 100

openhouse
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PROJECT:
TYPE C2 Myamba Parade

ADDRESS:
2A Myamba Parade
Surfside, NSW 2536

CLIENT:
Top Class Construction

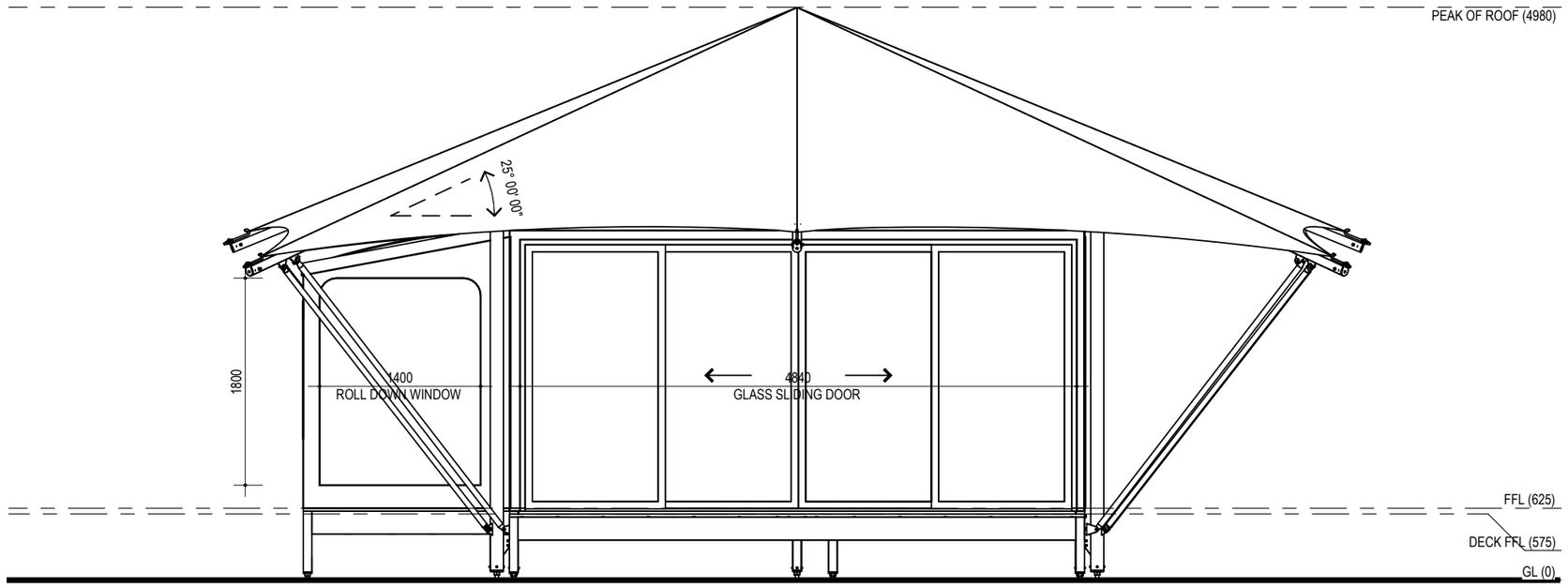
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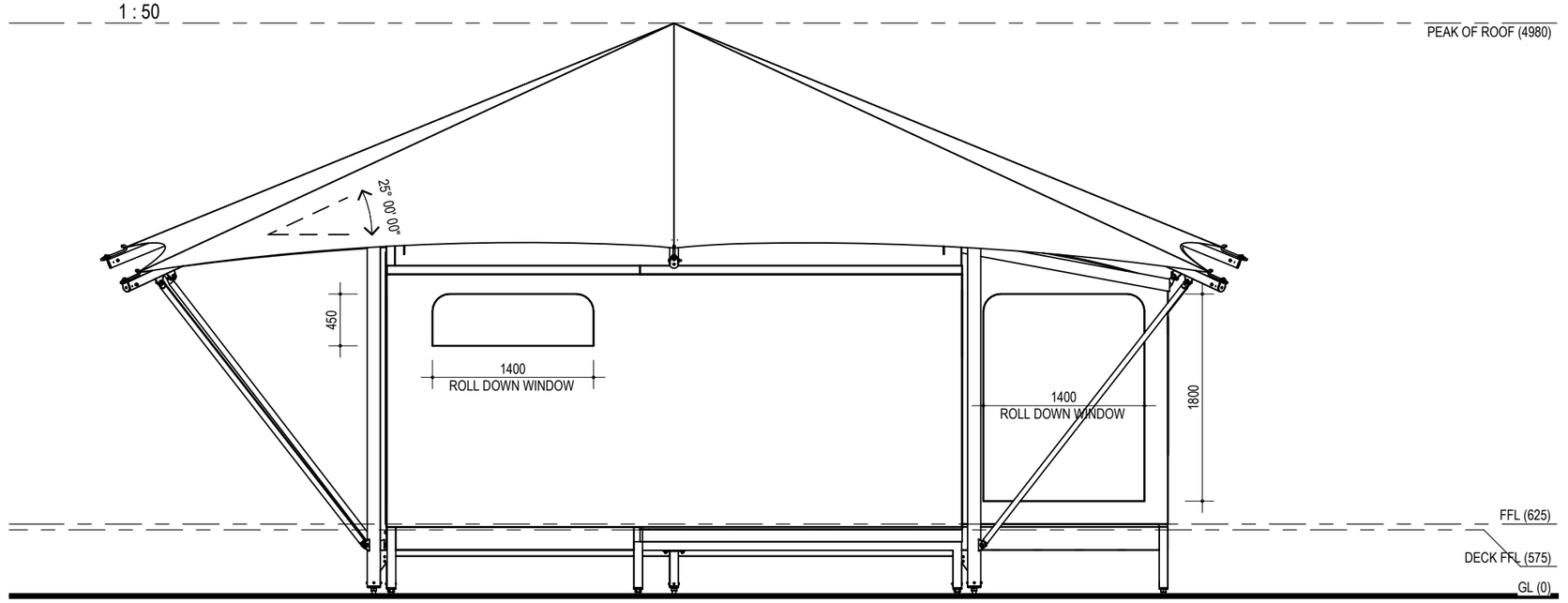
DRAWING FLOOR PLAN & 3D VIEWS

DRAWING NO. AA10 REVISION A



1. FRONT VIEW

1 : 50



2. REAR VIEW

1 : 50

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SCALE 1: 100

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4. THIS DRAWING TO BE READ IN CONJUNCTION WITH ALL BUILDING DESIGN DRAWINGS, ARCHITECTURAL NATSPEC SPECIFICATION, ALL CONSULTANTS DRAWINGS AND SPECIFICATIONS & MANUFACTURERS SPECIFICATION.
5. ALL WORKMANSHIP & MATERIALS TO BE IN ACCORDANCE WITH THE MOST CURRENT BUILDING REGULATIONS, S.A.A. CODES & AUSTRALIA STANDARDS.
6. CONCEPTS SHOWN ARE SUBJECT TO RELEVANT AUTHORITY APPROVALS.
7. FURNITURE, FIXTURE & LANDSCAPING FOR ILLUSTRATIVE PURPOSES ONLY.
8. 3D IMAGES FOR ILLUSTRATIVE PURPOSES ONLY.

PROJECT:
TYPE C2 Myamba Parade

ADDRESS:
2A Myamba Parade
Surfside, NSW 2536

CLIENT:
Top Class Construction

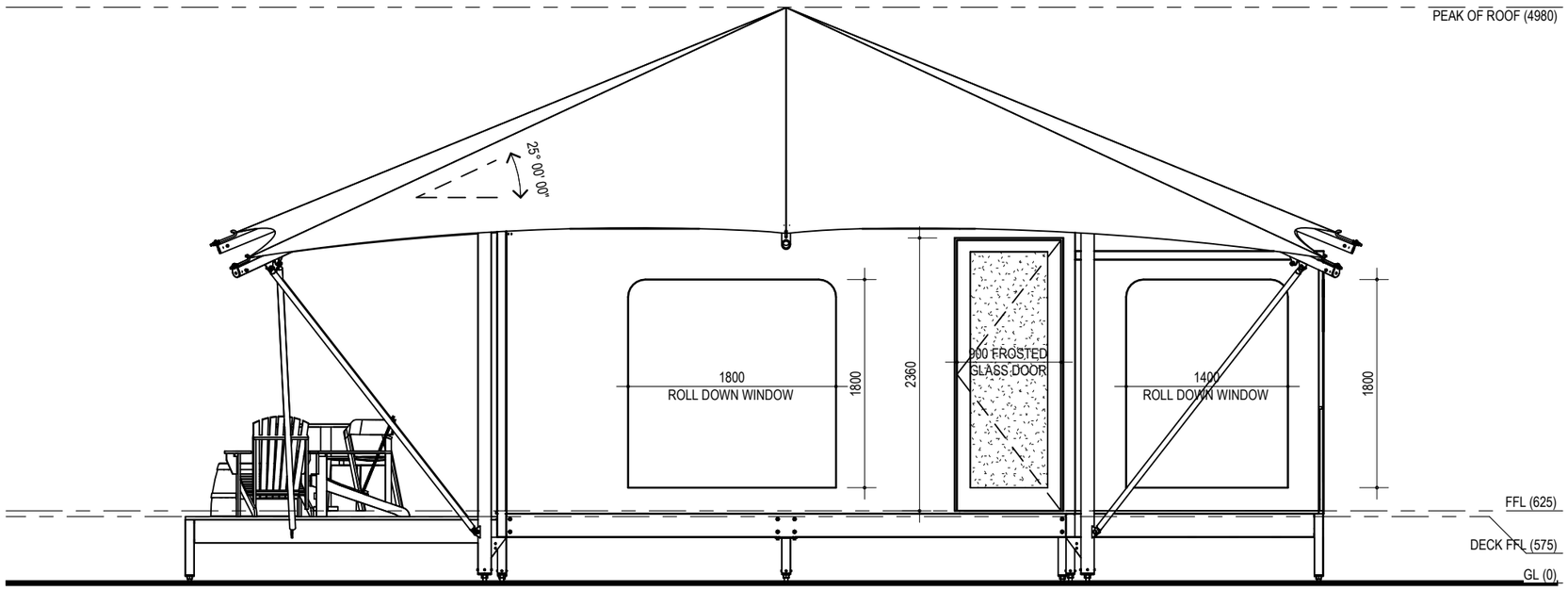
AA DRAWINGS

DRAWN	SCALE @ A3	DATE
MR	1 : 50	23.08.2022

PROJECT NO. 40-0754

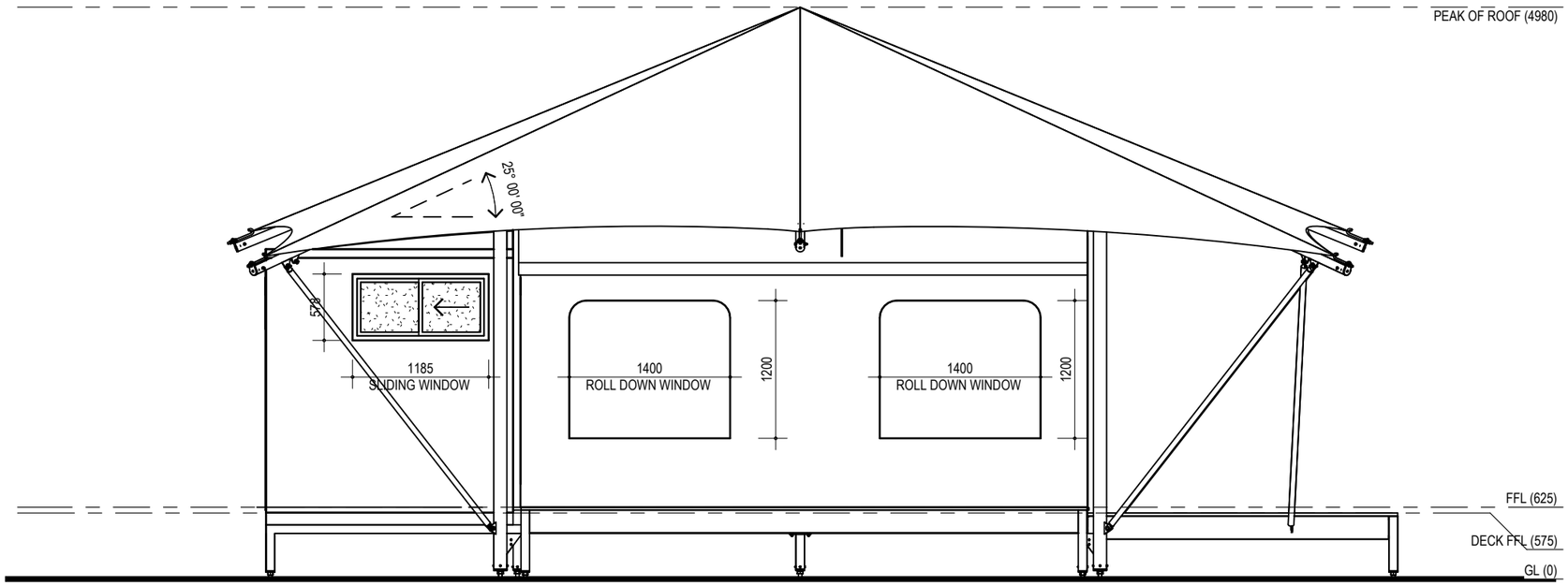
DRAWING ELEVATIONS

DRAWING NO. AA20 REVISION A



3. RIGHT VIEW

1 : 50



4. LEFT VIEW

1 : 50

0 1000 2000 3000 mm

SCALE 1: 100

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THE BUILDING SOLUTIONS GROUP

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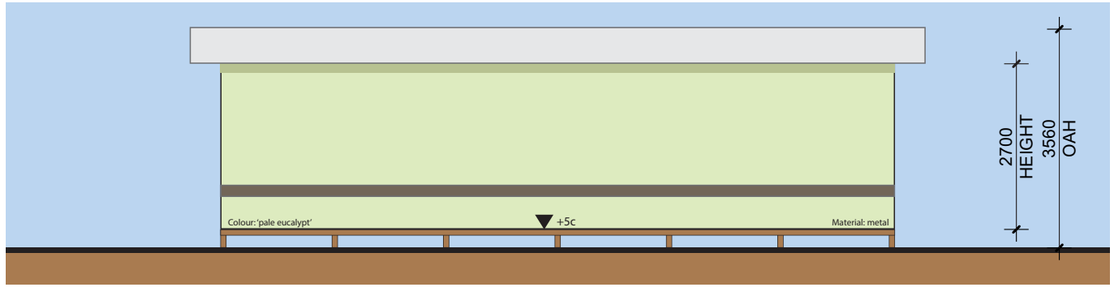
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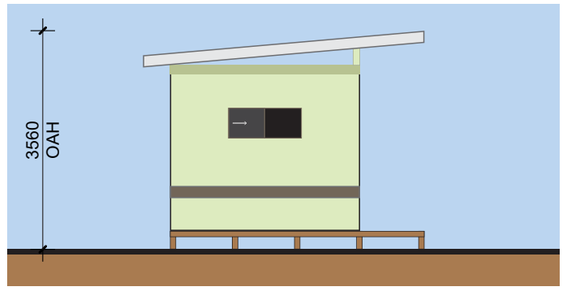
PROJECT NO. 40-0754

DRAWING ELEVATIONS

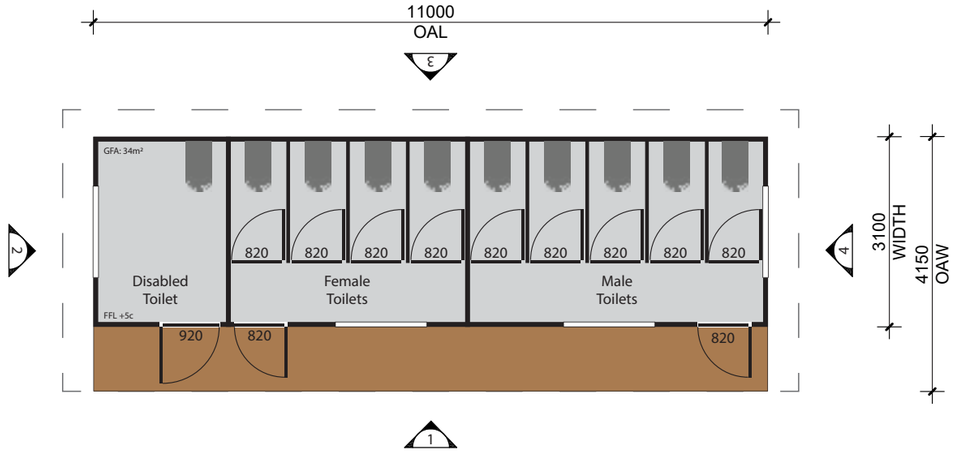
DRAWING NO. AA21 REVISION A



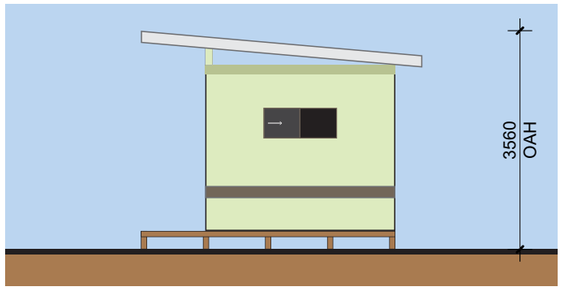
3 REAR ELEVATION (NW)
SCALE 1:100



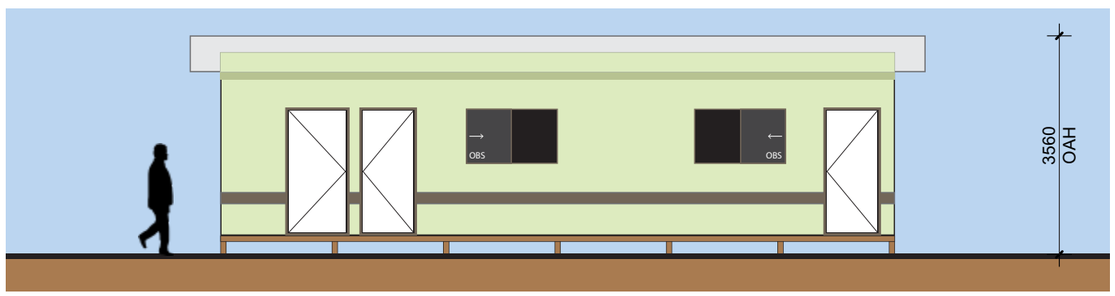
2 SIDE ELEVATION (SE)
SCALE 1:100



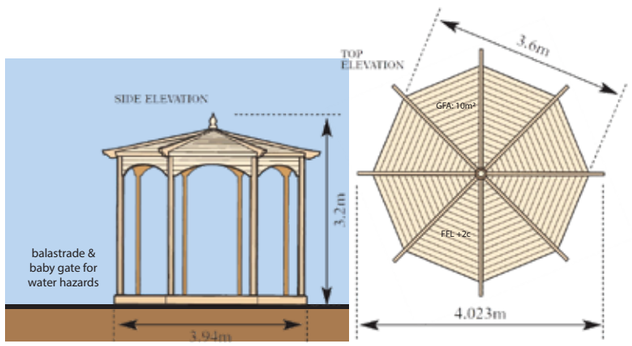
T FLOOR PLAN
SCALE 1:100



4 SIDE ELEVATION (NE)
SCALE 1:100



1 FRONT ELEVATION (SE)
SCALE 1:100



P PERGOLA FLOOR & ELEVATION
SCALE 1:100



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Tourism Council Western Australia

0 1 2 3 4 5 6 7 8 9 10 Metres

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Rev. B - July 2026
Salt Cove Bremer Bay
No. 43 (Lot 112) Horse Hill Rd, Bremer Bay
DA for Weddings & Accommodation – Appx.D5: Toilet Block Plan Set
N
1:100(A3)

Appendix E

Schedule of Submissions

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Schedule of Submissions

Proposed 'Reception Centre' & 10 Tourist Accommodation (Eco-Tents) at No. 43 Horse Hill Rd, Bremer Bay

No.	Submitter	Verbatim Submission	Applicant	Officer Comments	Recommendation
1.	P & M Brown	1. Presuming that the Shire will apply all the appropriate guidelines in running this sort of business, on a rural block, within the Point Gordon natural environment 2. Peter and I support the proposed reception centre and tourist accommodation, for 10 Eco Tents, and wish the proprietors all the best in their new business.	Support noted and appreciated.	1. Note – all planning requirements will be applied in the determination of this application 2. Note - Support	1. Noted 2. Noted
2.	David Harder	1. I have no objection to this development Project in its current form.	Support noted and appreciated.	1. Note - Support	1. Noted
3	David Harder	1. I am writing to formally withdraw the support I previously expressed regarding the proposed development at Salt Cove by Isaac Baum. 2. At the time I provided my initial response, I had only been given one page of the proposal and was not provided with the full scope of the planned development. I have since become aware that the project includes the development of caravan sites, which was not disclosed to me earlier. 3. This additional information places the proposal in direct conflict with my own interests.	Does not involve caravans, but noted for future reference.	1. Note 2. Dismiss – this application does not propose any caravan bays 3. Dismiss – this application does not propose any	1. Noted 2. Dismissed 3. Dismissed

		4. As such, I do not support the development, and I wish to have it officially noted that I rescind all support previously given.		caravan bays and as such is not in conflict 4. Dismiss – the objection is based on a misinterpretation of what development is proposed on the site.	4. Dismissed
4	Daniel Hill and Sarah Hall – Head Chefs and Company Directors The Local Native Catering Company	1. I am writing to you on behalf of 'The Local Native Catering Company' a local Bremer Bay based catering business to express our full support for the Wedding Venue Salt Cove owned by Issac and Brodie Baum and for their low impact, eco-friendly glamping accommodation proposed development 2. Over the past two years we have been privileged to cater several beautiful weddings and events at Salt Cove, and we have firsthand seen the positive contribution the venue makes to our small coastal tourist town. The proposed addition of sustainable glamping accommodation for wedding couples and their guests is, in our view a thoughtful and well aligned enhancement to the already existing offers. Also, a great opportunity to showcase our beautiful coats line and promote this rare, beautiful, untamed	Strong support noted and appreciated.	1. Note – Support 2. Note – Support	1. Noted 2. Noted

		south coastal town that we call home. 3. As a local business, we also recognise the wider economic benefits. Weddings, functions and retreats bring valuable year-round trade to our town, supporting caterers and other food business not just us plus businesses like florists, photographers, accommodation providers and many other local suppliers By strengthening the venue's appeal through sustainable overnight options, this development would help maintain and potentially extend the wedding season, supporting stable employment and continued investments in our community. 4. Importantly, from our experience working closely at the venue, the management team has demonstrated professionalism, solid environmental awareness, and respect for neighbours and the surrounding landscape We are confident that any development undertaken will be managed responsibly and sensitively. 5. In summary we believe this proposal represents a sustainable, low-impact enhancement that will benefit wedding couples, local businesses and the wider community while aligning with the character of our picturesque coastal town. 6. We respectfully ask that you give this application favourable consideration.		3. Note – Support 4. Note – Support 5. Note – Support 6. Note - Support	3. Noted 4. Noted 5. Noted 6. Noted

5.	Elsie Collins & Owen Roberts The Roadhouse Hooked & Cooked	1. The Roadhouse would like to state that we approve of your business, Hosting Weddings. 2. The weddings have brought many more people to town, which means the Roadhouse is busier, during our off season. 3. Being notified when weddings are happening, have helped us ensure that we have enough staff on for the weekend and we have enough fuel on hand.	Support noted and appreciated.	1. Note – Support 2. Note – Support 3. Note - Support	1. Noted 2. Noted 3. Noted
6.	Madeline Joy Bremer Bay Breakaways	1. I am writing to express my full support for Isaac & Brodie Baum and their vision for Salt Cove in Bremer Bay. 2. Their plans to host weddings & glamping experiences will bring new visitors to our town and has already further enhanced Bremer Bay's reputation. 3. As the owner of Bremer Bay Breakaways, I have already seen the positive effects from the weddings Isaac and Brodie hold, with many guests choosing to stay in local accommodation through my business. Their events generate valuable tourism and support surrounding operators, creating real benefits for the wider community. 4. I see their venture as a positive addition to our local tourism, complementing existing	Strong support noted and appreciated.	1. Note – Support 2. Note – Support 3. Note - Support 4. Note - Support	1. Noted 2. Noted 3. Noted 4. Noted

		accommodation and hospitality businesses while creating opportunities for collaboration across the community. 5. I congratulate Isaac and Brodie on their initiative and am fully supportive of their exciting plans for Salt Cove.		5. Note - Support	5. Noted
7.	Mel Joy Director Bremer Bay Resort	1. We are writing to formally express our strong support for Isaac and Brodie Baum and their exciting vision for Salt Cove Bremer Bay. 2. As the owners of The Bremer Bay Resort, we understand firsthand the importance of quality tourism experiences to the sustainability and growth of our town. Isaac and Brodie's plan to host weddings, glamping experiences, and other wellness activities at Salt Cove represents an important and valuable addition to the Bremer Bay community. 3. Salt Cove Bremer Bay offers a truly exceptional setting, with its breathtaking ocean views and natural surroundings providing a first-class venue for weddings and intimate gatherings. Their intention to also host health and wellness programs and events, and other immersive experiences will attract a diverse range of visitors seeking meaningful and nature-based escapes. 4. This venture will bring new visitors to Bremer Bay, extend length of stay, and further strengthen our reputation	Strong support noted and appreciated.	1. Note – Support 2. Note – Support 3. Note – Support 4. Note – Support	1. Noted 2. Noted 3. Noted 4. Noted

		as a premium regional destination. Their business will work to complement our business. While Salt Cove will provide a unique event and retreat space, The Bremer Bay Resort offers motel accommodation, dining facilities, and a bottleshop that can support guests and event attendees. We see this as a collaborative opportunity that benefits not only our respective businesses but the broader community, including local suppliers, trades, hospitality providers, and property owners. 5. Our residence (Gneiss Hill Road) is located close to Salt Cove, we are fully supportive of their plans and confident that Isaac and Brodie will operate their venue responsibly and with great care for the environment and community. 6. We congratulate Isaac and Brodie on their initiative, vision, and commitment to enhancing Bremer Bay's tourism offering. We wholeheartedly support their proposal and wish them every success with this exciting venture.		5. Note - Support 6. Note - Support	5. Noted 6. Noted
8.	Zane Mitchell Bremer Bay Brewing Company	1. We are happy to supply this letter of support for Isaac and Brodie in relation to their wedding venue on Point Henry in Bremer Bay. As the owners of Bremer Bay Brewing Co we believe that their venture compliments many other businesses in our growing town.	Support noted and appreciated.	1. Note – Support	1. Noted

		It does so by bringing in larger groups who spend at all the businesses in town while they are here. This is trade we would not have if the weddings were held in another tourist town.			
9.	Narelle Wessling Bremer Bay General Store	1. I am writing as a local business owner within the Shire of Jerramungup to express my support for Isaac and Brodie Baum in their proposal to establish a wedding venue at Salt Cove, Bremer Bay, incorporating eco glamping accommodation. 2. As a business operating in Bremer Bay, I recognise the significance of developments that attract visitors to the area, provided they respect the natural environment and bolster the local economy. This proposal is a well-thought-out opportunity to enhance sustainable tourism and diversify the town's offerings, all while maintaining the environmental values and character that both residents and visitors cherish in this unique part of the south coast. 3. The proposed wedding venue and eco glamping tents will encourage event guests to extend their stays within the Shire. This, in turn, will increase patronage of local businesses, including catering services, accommodation providers, retail outlets, and hospitality venues. Destination-based tourism of this nature is especially valuable for	Strong support noted and appreciated.	1. Note – Support 2. Note – Support 3. Note – Support	1. Noted 2. Noted 3. Noted

		regional communities and supports the ongoing economic resilience of the area. 4. The eco glamping model offers low-impact, temporary accommodation that complements the local landscape. It minimises the need for permanent infrastructure, reduces environmental disturbance, and allows for effective site rehabilitation if required. On-site accommodation also lessens late-night travel and reduces traffic movements, enhancing safety for both guests and the broader community. 5. In my view, this proposal aligns with the Shire of Jerramungup s goals of supporting sustainable development, fostering local employment, and ensuring responsible land use. With suitable management and operating conditions, the wedding venue and eco glamping tents will be a positive and complementary addition to the region. 6. I strongly support this application and encourage the Shire to give it favourable consideration.		4. Note – Support 5. Note – Support 6. Note – Support	4. Noted 5. Noted 6. Noted
10.	Peter & Elizabeth Tozer	1. This **s**ubmission to council is to oppose the broad scope of the 'Proposed Wedding & Short-Stay Accommodation Development Application. 2. In the Jerramungup TPS(2) it states that an objective of the Rural Residential (RR) Zone at Pt Henry is to Quote:	2. Rural zone, not Rural-Residential.	1. Note – Oppose 2. Dismiss - the site subject of the application is zoned 'Rural' and not 'Rural	1. Noted 2. Dismissed

		"to facilitate the creation of quality rural-residential retreats in a scenic coastal area," which I believe should be read in conjunction with this proposal on a rural zoned allocation as it is adjacent to, and would impact on these now developed residential lots, we share a long boundary with lot 112.		Residential'	
		3. The residents of these RR housing blocks have extra conditions to comply with, i.e.: specific building requirements, prohibits excessive clearing, most commercial/ development activities are excluded, no rural home businesses or rural pursuits. We agreed to these because we wanted to live in the ambience of a quite rural residential setting without the usual noise and bustle of town living.	3. Rural zone, not Rural-Residential.	3. Dismiss - the site subject of the application is zoned 'Rural' and not 'Rural Residential'	3. Dismissed
		4. About 18 months ago in an initial conversation with the Proposers Isaac and Brodie Baume I indicated I did not have a problem with their proposed wedding reception venue, as this would not include overnight stays. I stand by that comment.		4. Note – support for Reception Centre	4. Noted
		5. Most of the work done by the consultants gathered for the proposal only addresses the wedding venue and Glamping tents, however the	5-6. Only there to design around 'future possible' development, and	5. Note - the development application only consists of the	5. Noted

		envisaged development is a lot bigger than that. 6. The expansion in the plans is to also have at least twelve caravan bays, as indicated on the map in the proposal. If and when these bays are constructed, and available for tourists (I believe some bays are already there from previous camping stays on the Lot) 7. For an emergency evacuation, (In the Bushfire Management Plan of the Project (BMP) 5.4.1.2 A3.4 and 5.4.1.4) there are tracks that lead onto the Northern firebreak and ultimately Magpie Rise. (The plans on the map show Magpie Rise is to be extended.) There are too many unauthorized vehicles on this firebreak now, even although the Shire and DEFES have tried to discourage it by signage and chains across the entry/exit points. With a potential of 20 to 30 vehicles on the lot at any given time, (10 eco-tents and 12 caravan bays, staff and the owners) it is an obvious short-cut to Short Beach and beyond. 8. The Developer's Bushfire Management Plan 5.3.3 Element 4: "The planning proposal is for a `camping ground' vulnerable land use development. The required water supply dedicated to firefighting	future possible interest from investors. 7. Sounds like possible trespass and civil matter, not for Shire to get involved with. 8. 'Camping Ground' is the term used in legislation and is a best (but misleading) fit for	reception centre, 10 Glamping Tents, Fire Shelter and Toilet Block. 6. Dismiss – No caravan bays are proposed as part of the development 7. Note – there are only 10 Glamping Tents nor Caravan Bays are proposed. 8. Note –the Glamping Tents are considered a 'camping ground' No open fires will be permitted on the site	6. Dismissed 7. Noted 8. Noted

		purposes is to be determined at the discretion of the local government and this will be complied with. Evidence is provided of the determined requirements and is presented as an Addendum in this BMP;" This does not address the fact that; with secluded bays and no line of site from management, it would be impossible to police what should be, a definite NO open flame policy. I cannot see a no fire (no open flame) policy in the proposal. I have smelt smoke from these campsites when campers have been onsite previously.	eco-tents. No fires required with fitted-out eco-tents.		
		9. The precedent of this planned development will have an impact on the whole of Point Henry, and its future development, not just the adjoining landholders who have been made aware of it.	9. All DA's are assessed on merit, and would not be supported with Rural-Residential lot sizes and planning controls	9. Note – advertising was undertaken in accordance with Scheme requirements	9. Noted
		10. There is potential with this large 40ha site, to significantly expand the development, with no guarantee that the number of Eco-tents or caravan bays will not increase in future - Or that the site will not be subdivided/wholly sold, to another developer, with permissions already in place, to construct even more caravan bays to make the venture a worthwhile	10. Subject to application and assessment, if occurs.	10. Dismiss - any expansion of the uses on the site would be subject to another Development Application.	10. Dismissed

		investment. 11. Further to the above, there are more rural lots available here, one adjacent to the current project, and I would not wish to see others viewing this as a precedent, and so consider more inbuilding/development/commercial investments on a similar or larger scale, thereby changing the dynamics of what was designed to be an alternative to town living, and a tree change on larger lots moulded into the beautiful surrounds of Point Henry 12. I support the couple in principle in their endeavour to create a wedding venue and eco-tent, meditation tourist venue if all relevant Liquor and by-laws can be satisfied.	11. Possible Reserve? Subject to application and assessment, if occurs. 12. Support noted and appreciated.	11. Note – the development of any of the other rural lots will be the subject of a Development Application. 12. Note - support	11. Noted 12. Noted
11.	Jennifer Yeo	1. The subject land is zoned Rural under the Shire of Jerramungup Local Planning Scheme No. 2 (LPS2). A Reception Centre is not a use contemplated as permitted or discretionary in the Rural zone under the LPS2 Zoning Table. It is, in effect, a prohibited use ('X') in this zone. Tourist Accommodation may be considered discretionary ('A') only if it is clearly ancillary to an active rural or primary production use on the land. No such rural enterprise is evident from the application materials.	1. Not 'X' or incidental uses, it doesn't work that way.	1. Note -Reception Centre is an unlisted use and is dealt with under Clause 4.4.2 of Local Planning Scheme No. 2, Tourist Accommodation is a 'D' use rather than the 'A' use specified.	1. Noted
		2. The objectives of the Rural zone under LPS2 are to protect agricultural land, maintain rural character, and prevent	2. We have gained approval for over a dozen	2. Uphold - the subject lot is zoned 'rural' but it has not been	2. Upheld – reason for refusal – A Reception Centre is not

		inappropriate land use conflicts. The proposed development, which includes a reception/function centre capable of hosting weddings and events, together with 10 short-stay glamping-style eco tents, is a high-intensity, visitor-facing commercial enterprise that is fundamentally inconsistent with these objectives.	similar developments in rural areas with similar (or identical) objectives. We also provided copies to the Shire to demonstrate this. There is nothing fundamental about it. Think about how viable agriculture is on this land, and what impacts that would have upon the environmental and neighbours' amenity.	developed for agricultural activity. The objectives of the 'rural' zone are: To ensure the continuation of broad-hectare farming as the principal land use in the district and encouraging where appropriate the retention and expansion of agricultural activities where the land is capable of such development - To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment. - To allow for facilities for tourists and travellers, and for recreation uses. - To help protect rural	considered consistent with the objectives of the 'rural' zone.

				land from land degradation and further loss of biodiversity by: • minimising clearing of remnant vegetation • encouraging retention and protection of remnant vegetation • encouraging development and protection of vegetation corridors • encouraging development of sustainable surface and sub-surface drainage works • encouraging rehabilitation of salt-affected land • encouraging soil conservation through land management measures • encouraging identification and protection of wetlands - To promote the sustainable	

				management of natural resources, and the prevention of land degradation. The proposed use as a reception centre as an unlisted use is not consistent with the objectives for the 'rural' zone.	
		3. The majority of properties on the Point Henry Peninsula, including those adjoining or near the subject site, are zoned Rural-Residential. Owners in this zone have a reasonable expectation of low-intensity, lifestyle-compatible land uses in the surrounding area. The proposed development would generate the following unacceptable amenity impacts. Noise from events, functions, music, and gatherings at the Reception Centre, particularly during evenings and weekends;	3. You don't have a legal right to control other peoples land on differing zones based upon your subjective assumptions and expectations. We have commissioned many noise reports and know the distances and contours will result in compliance with the Noise Reg's.	3. Uphold – given the low density of surrounding development that activities on the site would have a negative impact on the amenity of adjoining properties.	3. Upheld The scale of the development is considered to have a negative impact on adjoining properties
		4. Increased traffic volumes on Horse Hill Road, a rural road not designed to accommodate large numbers of event vehicles, buses, or caravans;	4.0 Magpie Rise is for emergency egress, but it and Horse Hill Road	4. Uphold – large numbers of vehicles and buses may be associated with	4. Upheld – the increased traffic volumes would have a

			are public roads, not for the exclusive use of other landowners	events. If Magpie Rise is constructed to connect to the site, the flow of additional traffic down this road would have a negative impact on amenity.	negative impact on the amenity of adjoining lots.
		5. With 40 car parking bays proposed, the development will generate a substantial volume of vehicle movements on Horse Hill Road and the surrounding road network. A venue of this scale — accommodating guests arriving and departing for functions, as well as 10 overnight accommodation units — could reasonably be expected to generate in excess of 40 vehicle entries and exits per day, with multiple movements occurring throughout the day and into the evening. Horse Hill Road is a narrow, unsealed rural road that is wholly unsuited to this level of traffic intensity. No traffic impact assessment has been provided with the application, and the Shire should require one before any approval is considered;	5. Unlikely to be 40, but if so, is regarded by Traffic Engineers at the low end of 'Moderate', at 1 trip per 1.5 minutes (not substantial or overwhelming), which was demonstrated to the Shire.	5. Uphold - No traffic impact assessment has been provided with the application and as such there is insufficient information to determine the application.	5. Upheld – further information is required for a traffic impact assessment, and the application cannot be determined until this is satisfied.
		6. The application proposes an entrance via Magpie Rise, a residential street that connects to Short Beach — one of the most valued and heavily used community amenities on the Point Henry Peninsula. Routing commercial event and tourist traffic along Magpie Rise is wholly inappropriate. It would significantly increase traffic volumes on a quiet residential street, create safety	6. Magpie Rise is rural-residential. So public roads aren't for all the public, just those that you like? If This road is so busy as you say, then how can	6. Uphold - If Magpie Rise is constructed to connect to the site, the flow of additional traffic down this road would have a negative impact on safety and amenity.	6. Upheld – the increased traffic volumes would have a negative impact on the safety and amenity of adjoining lots

		concerns for pedestrians and families walking to Short Beach, and degrade the amenity of both the street and the beach precinct. Short Beach is used daily by local residents and visitors for swimming, walking, and recreation, and the introduction of a steady stream of event vehicles and tourist traffic along the access road to the beach would have a serious and lasting negative impact on the character and safety of this area;	some more cars destroy local character and amenity? Your opposition to the proposal is clearly blinding your objectivity.		
		7. Light pollution from event lighting, vehicle headlights, and signage at night in what is currently a dark, rural coastal landscape;	7. The distance and contours are significant screens to light, and there is no restriction on light. The signage is non-illuminated.	7. Uphold – Light pollution would have a negative amenity impact on the surround area.	7. Upheld - Light pollution would have a negative amenity impact on the surround area.
		8. Loss of residential amenity and peaceful enjoyment for neighbouring property owners;	8. It's Rural-Residential, and a vague argument.	8. Uphold - the nature of the development could impact residential amenity and peaceful enjoyment for adjoining property owners.	8. Upheld - the nature of the development could impact residential amenity and peaceful enjoyment for adjoining property owners
		9. The proposed car parking of 40 bays and a bus bay is indicative of significant commercial-scale patronage entirely out of character with the rural-residential neighbourhood.	9. It's a Rural block with a vast 100 acres of land and the proposal cannot be seen from your	9. Uphold – whilst the lot is zoned 'Rural' it is surrounded by lots zoned 'Rural Residential' and the proposed car parking of	9. Upheld - whilst the lot is zoned 'Rural' it is surrounded by lots zoned 'Rural Residential' and the proposed car parking

			property due to distance and contours. Your house is on 60m AHD, the weddings on 65m, with a screening ridge a 70m and small hi at 80m, over a significant distance of 410m	40 bays and a bus bay is of a scale that is out of character with the adjoining land zoned 'Rural Residential'.	of 40 bays and a bus bay is of a scale that is out of character with the adjoining land zoned 'Rural Residential'
		10. The Point Henry Peninsula is a bushfire-prone area. The proposal involves placing 10 eco tent structures and a function venue with large public gatherings in a vegetated coastal landscape. Eco tents are fabric-based, semi-permanent structures that are inherently vulnerable in bushfire conditions.	10. Eco-Tents are classed in the Bushfire Guidelines as a 'tolerable loss', and the risk of loss is a private consideration, no the neighbours or council.	10. Uphold – The eco tents are all located at the extremity of the site and the ability to evacuate these if a fire is approaching would be difficult. Eco tents are inherently vulnerable in bushfire conditions.	10. Upheld - The eco tents are all located at the extremity of the site and the ability to evacuate these if a fire is approaching would be difficult. Eco tents are inherently vulnerable in bushfire conditions.
		11. The site is not connected to reticulated sewerage. A Reception Centre hosting functions and 10 tourist accommodation units will generate significant volumes of wastewater. The plans show multiple leach drain systems, but I am concerned that: a) The soil and drainage conditions on the Peninsula may not support adequate on-site effluent disposal at the scale proposed; b) Proximity to Salt Cove and the coastal marine environment creates a risk of nutrient	11. The previous soil report was approved by the Shire, and it is extremely unlikely that additional pit would differ. Furthermore, plumbing issues are dealt with	11. Uphold – the site is not connected to reticulated sewerage and the provided and the Site Classification Report provide as part of the application is not related to the application as it only deals with and ancillary unit and a 2	11. Upheld - the site is not connected to reticulated sewerage and the provided and the Site Classification Report provide as part of the application is not related to the application as it only deals with and

		and contamination run-off; c) The application does not appear to include a formal wastewater management report demonstrating compliance with Department of Health requirements	(appropriately) at the Building Permit phase.	bedroom dwelling not the proposed development and as such it had not demonstrated that the site can accommodate the proposed development specifically the toilet block and the eco tents and should not be supported.	ancillary unit and a 2 bedroom dwelling not the proposed development and as such it had not demonstrated that the site can accommodate the proposed development specifically the toilet block and the eco tents and should not be supported.
		12. LPS2 Clause 5.13 requires the Shire to consider the visual impact of development near the coast. Salt Cove and the surrounding coastal vegetation are environmentally and visually significant. A commercial facility with 40 car parks, a bus bay, signage, function buildings, 10 accommodation tents, toilet blocks, and associated infrastructure would have a visible and irreversible impact on this sensitive coastal landscape.	12. As discussed above, the contours and distance screen development from view. Furthermore, the scale of development on a 100 acre lot (plus surrounding undeveloped properties) is ludicrously insignificant. Sensitive how? Then the 100+ houses on 8 acre blocks on the	12. Uphold – Local Planning Scheme No. 2 Clause 5.13 states that the local government is to have regard to the visual impact of and land use or development for land adjacent to the coast. The scale of the development with 40 car parks, a bus bay, signage, function building, 10 eco tents, toilet blocks and associated development will be	12. Upheld - Local Planning Scheme No. 2 Clause 5.13 states that the local government is to have regard to the visual impact of and land use or development for land adjacent to the coast. The scale of the development with 40 car parks, a bus bay, signage, function building, 10 eco tents, toilet blocks and associated development will be

			peninsula should never have been approved, now be demolished and reclaimed by nature.	visible and may impact the sensitive coastal landscape	visible and may impact the sensitive coastal landscape
		13. The master plan submitted with the application shows extensive 'possible future stage' development including additional caravan rows and a central facilities building. This indicates the applicant's intention to develop a much larger tourist park and events venue over time. The Shire should consider this cumulative intent, not just the immediate footprint, when assessing the proposal's impact on the Rural zone and its neighbours.	13. The impact of something not 'proposed' is clearly nil.	13. Dismiss - any expansion of the uses on the site would be subject to another Development Application.	13. Dismiss
		14. For the reasons outlined above, I respectfully but firmly object to Planning Application P26-006. The proposed Reception Centre and Tourist Accommodation are inconsistent with the Rural zone objectives, the character of the Point Henry Peninsula, and the amenity of neighbouring Rural-Residential properties. The application raises unresolved concerns regarding bushfire safety, wastewater management, and coastal environmental impact.	14. See my arguments elsewhere.	14. Uphold - The application raises unresolved concerns regarding bushfire safety, wastewater management, and coastal environmental impact.	14. Upheld - The application raises unresolved concerns regarding bushfire safety, wastewater management, and coastal environmental impact.
		15. I request that the Shire refuse this application. In the alternative, if the Shire is minded to approve the application, I request the opportunity to be heard at any Council meeting at which this matter is determined,	Noted.	15. Note – request to refuse.	15. Noted

		and that I be notified of the outcome.			
12.	Withheld	1. I request that my name, contact details, and the contents of this submission remain confidential and are not disclosed to the owners of Salt Cove or to any other parties outside the relevant departments of the Shire of Jerramungup. This submission is provided on the understanding that my personal information will be protected and used solely for the purpose of assessing the proposed development.	1-3. Noted.	1. Note – contact details withheld from schedule and redacted from submission.	1. Noted
		2. When initially approached by the proponent, Mr Isaac Baum, I was provided with only a single-page document. Based on that limited information, I indicated that I had no objection to the proposal.		2. Note – advice of discussion with proponent.	2. Noted
		3. It has since become clear that this was not the full or accurate scope of the development.		3. Dismiss - any expansion of the uses on the site would be subject to another Development Application.	3. Dismissed
		4. A facility of this nature would be more beneficial to the Bremer Bay community if the existing Sports Club were further developed and more fully utilised, with fewer operational restrictions limiting its use. Strengthening an established community asset would provide broader and more equitable benefit while avoiding the need to introduce new facilities in environmentally and strategically sensitive	4. Not a relevant consideration.	4. Dismiss – an alternative proposal cannot be substituted for the current application. The current application must be determined.	4. Dismissed

		locations.			
		5. I am also concerned about the environmental implications of the proposal, particularly in relation to the clearing of large areas of vegetation, the presence of rare plant species, and the established fauna corridors that traverse the site. These elements form an important part of the ecological character of the area and contribute to the broader environmental values of Point Henry.	5. Clearing of vegetation that is not a protected species is not a barrier to development, otherwise none o the 100+ houses, roads, driveways and firebreaks on the peninsular would have been constructed. Many of the proposed driveways are along firebreaks, eco-tents do not require an APZ, APZs are not tota clearings, and total proposed clearing is clearly minuscule on a 100 acre lot.	5. Uphold – The proposal will be required to clear large areas to achieve appropriate BAL ratings for the fire shelter, the access roads for the eco tents as well as clearing for the ATU's disposal fields. This is not consisted with the objectives of the 'Rural' zone specifically: - To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment. and - To help protect rural land from land degradation and further loss of biodiversity by: a. minimising clearing of remnant vegetation b. encouraging retention and protection of remnant vegetation	5. Upheld - The proposal will be required to clear large areas to achieve appropriate BAL ratings for the fire shelter, the access roads for the eco tents as well as clearing for the ATU's disposal fields. This is not consisted with the objectives of the 'Rural' zone.

		6. Wastewater and effluent disposal are also a concern given the proximity of the proposed development to the ocean. The sensitivity of the coastal environment means that any failure, overload, or poorly designed system could have direct impacts on marine water quality, dune ecology, and nearby recreational areas.	6. All required to be demonstrated at the Building Permit phase. The existing soil report examined wastewater for other buildings in the immediate vicinity of the proposed systems, and it is lubricous to envisage that the new systems would be a problem. If however the Shire identified such and issue and requested further information (standard procedure), then it would have been done.	6. Uphold – the provided Wastewater and the Site Classification Report provided as part of the application is not related to the application as it only deals with an ancillary unit and a 2 bedroom dwelling not the proposed development and as such it had not demonstrated that the site can accommodate the proposed development specifically the toilet block and the eco tents and should not be supported.	6. Upheld - the provided Wastewater and the Site Classification Report provided as part of the application is not related to the application as it only deals with an ancillary unit and a 2 bedroom dwelling not the proposed development and as such it had not demonstrated that the site can accommodate the proposed development specifically the toilet block and the eco tents and should not be supported
		7. Given the clear limitations placed on developing my own property, the approval of a caravan park at Salt Cove would appear inconsistent with established planning expectations for this area.	7. Not part of this application, may never happen.	7. Dismiss - any expansion of the uses on the site would be subject to another Development	7. Dismissed

				Application.	
		8. There is a history of non-compliance at Salt Cove, with numerous complaints and comments previously raised by community members.	8. Noted.	8. Note – this application is retrospective with elements of new development included.	8. Noted
		9. I request to be kept informed of all updates, submissions, and opportunities for input relating to this proposal. As an affected landowner, I wish to ensure that all future decisions are made transparently and with full consideration of the planning constraints and community concerns.		9. Note – request to stay informed of all updates relating to the site and the application.	9. Noted
		10. In closing, the proposal presents significant concerns across environmental, commercial, and safety domains that make it unsuitable for this location. The development would compete directly with existing accommodation providers outside peak periods, while offering less community benefit than further investment in established facilities. The environmental impacts of clearing, and the risks associated with wastewater near the coast pose avoidable threats to the area's ecological character. Fire-risk issues remain substantial. DFES has previously advised that development is not supported on Point Henry Penisula due to the locality's fire-risk	10. As above.	10. Uphold - the proposed development presents concerns with environmental, commercial, and safety domains and as such should be refused.	10. Upheld - the proposed development presents concerns with environmental, commercial, and safety domains and as such should be refused.

		profile.			
13.	Lyons Architects on behalf of Hillboi Nominees Pty Ltd	1. Please accept this **OBJECTION** on behalf of **Hillboi Nominees Pty Ltd** to this proposed commercial development on the neighbouring Rural lot that adjoins their southern boundary and shares approximately 700 metres of that boundary.	1. This is not just a NIMBY submission, it is a detailed BANANA submission - Build Absolutely Nothing Anywhere Near Anything.	1. Note – objection.	1. Noted
		The applicant intends to build a commercial access road along this boundary for almost the entire length without any landscape buffer and without sealing the road or the ability to fence this road off resulting in additional noise, dust, loss of privacy and increased risk of fire without any consultation with the affected neighbour.	There's no such thing as a commercial access road, it's just a driveway. Well, there would be plenty of screening if you didn't illegally clear 5ha of vegetation in this exact same area in late 2025, so privacy doesn't appear to be a big an issue as you are making out. I wonder how much dust will		

			be created now that your land has been denuded, without consultation. What risk of fire - a driveway along a firebreak will cause a bushfire?		
		2. The **Applicant** has applied for approval for Land Use of 'Reception Centre' and 'Tourist Accommodation'.	2. Agreed.	2. Note – description of proposed development.	2. Noted
		3. 'Reception Centre' is not a permitted or considered Use in the Shire of Jerramungup Local Planning Scheme No.2 In this situation, the Shire would need to determine that the use of the property is **consistent with the objectives of the Rural zoning** before approving application. The Applicant has **not** sufficiently demonstrated that the proposed use is consistent with the Objectives of the Rural Zone	3. The planning report has addressed the objectives. Read it first. The Site is not 'broad-acre' which is a minimum of 100's-1000's of acres, and this landowner as a farmer knows that far more than you. Notice the word '<u>encourage</u>' protection of vegetation, not	3. Uphold - the subject lot is zoned 'rural' but it has not been developed for agricultural activity. The objectives of the 'rural' zone are: To ensure the continuation of broad-hectare farming as the principal land use in the district and encouraging where appropriate the retention and expansion of agricultural activities where the land is capable of such development	3. Upheld - The proposed use as a 'reception centre' as an unlisted use is not consistent with the objectives for the 'rural' zone.

			protect at all cost (or words to that effect)? Rural land is capable under <u>your</u> zoning table of a variety of uses other than agriculture, including Reception Centre. The Site is not feasible for Agriculture-Extensive due to area, but Agriculture <u>Intensive</u> is possible, not that it would be acceptable to the neighbour. We have gained approval for weddings on Rural land before in many other Shires, so it is not convincing to hear that it is incapable of	To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment. To allow for facilities for tourists and travellers, and for recreation uses. To help protect rural land from land degradation and further loss of biodiversity by: • minimising clearing of remnant vegetation • encouraging retention and protection of remnant vegetation • encouraging development and protection of vegetation corridors • encouraging development of sustainable surface and sub-surface drainage works • encouraging rehabilitation of salt-	

			approval. The Shire has offered an unsupported statement. Zero reasons, and is clearly not making an argument. These are objectives only, needs to be read in conjunction with specific statutory planning controls. Needs to be read in conjunction with <u>your</u> Local Planning Strategy which identifies this site for 'high-quality <u>ecotourist accommodation</u>' opportunities.	affected land • encouraging soil conservation through land management measures • encouraging identification and protection of wetlands To promote the sustainable management of natural resources, and the prevention of land degradation. The proposed use as a reception centre as an unlisted use is not consistent with the objectives for the 'rural' zone.	
		4. The planning report also fails to mention a required very large 45-49m bushfire asset protection zone (APZ) around the proposed bushfire shelter (converted existing shed). This represents over 10,000m2 of cleared bushland.	4. The APZ is no-where near 10,000m^2+, it's actually ~7,500m^2 if you bothered to do the math, minus	4. Uphold – The proposal will be required to clear large areas to achieve appropriate BAL ratings as well as access roads for the eco tents and	4. The proposal will be required to clear large areas to achieve appropriate BAL ratings as well as access roads for the

		Future proposed uses (chalets, cleared lawn area/stage, level caravan sites etc) shown on the plans submitted with the application will further degrade the natural environment of the site. When assessing the application, the Shire will need to consider the main principles underlying the Shire's Local Planning Strategy for Rural Zoned Lots i.e...."to protect sensitive and significant environmental areas" with "<u>no adverse impacts</u> on the surrounding land and rural activities". The proposal does not comply as there are obvious adverse impacts. The proposal is applying for approval for an intensive commercial use of a property zoned for <u>low-intensity</u> Rural use only. Approval for this proposal would create a significant higher risk of adverse impact on the site environment, Rural character and amenity of the adjacent properties than would be expected from a single holiday home (which requires a Property and Guest Management Plan) or a Rural Home Business	already cleared land, resulting in ~5,000m^2 (<u>half</u> of your over exaggeration). Last year, your brother (landowner) illegally cleared ~50,000m^2 of land, but curiously it didn't matter then. The arrogance is breathtaking. Clearing of 'other' type vegetation is not grounds for refusal. 'Possible future' development is clearly not part of this application. The Objectives of the zone do not say "no adverse impacts…". You're just	effluent disposal areas for ATU's. This is not consisted with the objectives of the 'Rural' zone specifically: - To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment. and - To help protect rural land from land degradation and further loss of biodiversity by: a. minimising clearing of remnant vegetation b. encouraging retention and protection of remnant vegetation	eco tents and effluent disposal areas for ATU's. This is not consisted with the objectives of the 'Rural' zone.

			making things up. If the zone was for 'low-intensity rural use only', why is 'Agriculture-Intensive', and 'Industry-Extractive' (and many other uses) capable of approval in the zoning table? Have you even been on a farm before? You would have zero idea what rural character and amenity means, yet so confident in your opinions.		
		5. The second Use being applied for is 'Tourist Accommodation'. This is a **Discretionary** use within the Shire of Jerramungup Local Planning Scheme No.2, and planning approval must be obtained. However, while the Shire seeks to actively	5. Noted. Want to offer a	5. Uphold – the proposed 'tourist accommodation' may have unsatisfactory environmental impacts due to clearing for roads and effluent	5. Upheld – the proposed 'tourist accommodation' may have unsatisfactory environmental impacts due to clearing for roads and effluent

		encourage high quality short term accommodation proposals, they must be at 'appropriate densities suited to the site location'...which 'assist in attracting more tourists into the area during off-peak times'...and 'provided that no land use or environmental conflicts arise'. The application report Part 4.2 Operational Details identifies that the main season for events will be during the warmer months, and therefore the associated accommodation occupancy connected to these events will not provide additional accommodation during off peak times. The respondent is familiar with the Eco tent accommodation type proposed and due to their lack of insulation they are only comfortable for guests during a narrow summer season when the weather is not inclement. The viability of the development for off peak and off-grid general tourist accommodation is very questionable and not sustainable during off peak times.	statutory planning source, or should be just believe everything you say? Accommodation offered in off-peak without a wedding. What's your point? But your eco-tent camping ground at Discovery Park on Rottnest Island was completely acceptable year-round when you applied for planning approval? The audacity to go there, just wow. Regardless, its none of your business (unless you are a shareholder),	disposal areas.	disposal areas.

			and neither for the Shire (not a planning consideration).		
		6. The Applicant has omitted a number of critical documents and studies in their Development Application and does not appear to have a detailed understanding of the site topography and site conditions in terms of manageable site access, construction and safety. The Local Planning Strategy for Area 17 (Point Henry Peninsula), requires all proposals for development on the Rural-zoned lots must be considered against the Point Henry Limited Rural Strategy 1991, and comprehensively address issues such as environmental assessment, land capability, visual impact, effluent disposal capability, water management and drainage, servicing...etc.	6. Not all DAs (especially in rural areas) require a full suite of expensive reports, which differs significantly from this architect, and the Shire never asked for any (except the BMP of course). Just like the Shire, a poor understanding of the planning system and failed to read the Strategy (or cherry-picked). S.1.3 Role & Purpose, states 'Local Planning Strategies are <u>non-statutory</u> strategy planning tools…'	6. Uphold - The Applicant has omitted a number of critical documents and studies in their Development Application. There are question related to the site topography and site conditions in terms of manageable site access, construction and safety	6. Upheld - The Applicant has omitted a number of critical documents and studies in their Development Application. There are question related to the site topography and site conditions in terms of manageable site access, construction and safety.

			That means - not assessable against DA's. Also see s.7.0 Strategic Planning Considerations, where Area 17 is discussed. And the Site is not within Area 17, which is Rural-Residential (not Rural). The Strategy does however identify the site for '...high-quality ecotourist accommodation' which is exactly that proposed. Did The Shire actually read the Strategy and formed its own opinion separate from the complainant, or		

			is this AI generated?		
		7. The Point Henry Limited Rural Strategy indicates that the 'Rural' zoned Lots were environmentally sensitive and should not be used for anything more than low intensity uses.	7. Again, explicitly not a statutory planning tool. Do you even know what that means? Again, Rural zoned lots can be approved for 'Agriculture-Intensive' and mining under the zoning table. As the Strategy recommended the site be used for eco-tourist accommodation, it's implied that the use is low intensity and ideal for the site.	7. Uphold – The Point Henry Limited Rural Strategy identified the subject lots as being highly constrained and as such was excluded from 'Rural Residential' development.	7. Upheld – The Point Henry Limited Rural Strategy identified the subject lots as being highly constrained and as such was excluded from 'Rural Residential' development.
		8. The Applicant does not provide any detailed assessment of the flora and fauna on the site. There is no vegetation study provided. There is also only a cursory reference to	8. There is zero indications on government GIS and the Shire's Veg Mgt Study (as stated in the	8. Uphold – A vegetation study or fauna study was not provided and the comment in Part 2.3 stating that no wildlife	8. Upheld – A vegetation study or fauna study was not provided and the comment in Part 2.3 stating that no

		Fauna under Part 2.3 with ‘no wildlife observed other than transitory birds’. A casual walk in the area reveals kangaroos, other mammals, lizards and other reptiles, territorial birds and many insects.	planning report) that there are any protected flora & fauna on the development portion of the lot, and it is inappropriate to request expensive and time-consuming reports with zero reason, probably only to cause delay and cost. Did your brother do a flora & fauna report before illegally clearing ~5ha (50%+) of his land in late-2025 (see update Master Plan)? The hypocrisy is staggering. Again, the Shire never requested or suggested a flora & fauna report is necessary.	has been observed on site other than transitory birds demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.	wildlife has been observed on site other than transitory birds demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.

		9. No detailed site survey with accurate contours (at 0.5 M minimum) has been provided with the application and the site contours (at 10 M) shown on the location plan D2 do not represent the actual site topography, when referenced against the Landgate resources. Some parts of the eastern corner of the site have a gradient of approx 1:3 (potentially requiring massive civil works or a bridge to provide the proposed access roadway to service the proposed Eco Tents).	9. We designed around 2m contours, but it clutters the page, so for clarity only 10m contours shown on Locality Plan (and now also Master Plan). Agreed, to be safe, <u>one</u> driveway repositioned in the updated Master Plan.	9. Uphold – given the topography of the site as identified in the Point Henry Limited Rural Strategy a detailed site survey with accurate contours has not been provided with the application. Given the slopes that occur towards the coast where the Eco tents are proposed can be up to the 1:3 gradient it will make constructing roads to service these difficult.	9. Upheld - given the topography of the site as identified in the Point Henry Limited Rural Strategy a detailed site survey with accurate contours has not been provided with the application. Given the slopes that occur towards the coast where the Eco tents are proposed can be up to the 1:3 gradient it will make constructing roads to service these difficult.
		10. There is insufficient information provided about the design of the proposed buildings and structures and therefore to ensure that the development is of ‘high quality’.	10. ‘High-quality’ is subjective and not a statutory planning requirement (your reference?), but the product is, <u>exactly the same</u> that you selected for Discovery Park - Rottnest Island, which I’m sure you described	10. Uphold – there is insufficient information design of the proposed buildings and structures and therefore to ensure that the development is of ‘high quality’	10. Upheld - there is insufficient information design of the proposed buildings and structures and therefore to ensure that the development is of ‘high quality’

		The proposed toilet block (described as a 'demountable' in the applicant's report) is non compliant in terms of DDA (wheelchair) access and Building Construction Code compliance.	as high-quality. Again, staggering arrogance. So a ramp will be shown on the Building Permit, where it will be assessed against the BCA (not a planning issue).	The proposed demountable toilet block does not show how a wheelchair would access the facility as it is raised from the ground.	The proposed demountable toilet block does not show how a wheelchair would access the facility as it is raised from the ground.
		11. Point Henry is a known high-fire risk area, with only one access road in and out of the peninsula which makes it a dangerous location for the congregation of large groups such as weddings. Both a BEP and LMP are required Fire Planning documents for vulnerable land uses. While a Bushfire Management Plan (BMP) has been provided with the application, the Bushfire Evacuation Plan (BEP) is referenced in the BMP but has not been provided. A Landscape Management Plan (LMP) has also not been provided. The BEP should address risk to life resulting from the current proposal and cover the known risks and considerations:	11-12. The BEP is not a consequential document and the Shire agreed prior to lodgement, offering to include it as a condition of planning approval, and we followed their advice. I'll always trust a Level 3 Bushfire Consultant over an architect or planner.	11. Uphold - Point Henry is a known high-fire risk area, with only one access road in and out of the peninsula which makes it a dangerous location for the congregation of large groups such as weddings. The Shed which is being converted into a fire shelter would need to comply with the following: While closure and early	11. Upheld - - Point Henry is a known high-fire risk area, with only one access road in and out of the peninsula which makes it a dangerous location for the congregation of large groups such as weddings. The Shed which is being converted into a fire shelter would need to comply with the following:

			You reference the shelter to comply with the **B**CA, but fail to mention that this is assessed at the **Building** Permit phase (clearly not a planning issue).	evacuation are recommended in the first instance, the following conditions should be imposed on a development approval where on-site shelter in a building is proposed: a. The on-site shelter must be designed and constructed in accordance with the **Building** Code of Australia and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). The design must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. b. Prior to occupation of the development, a final inspection of the on-site shelter must be undertaken by a suitably qualified fire engineer with fire risk	While closure and early evacuation are recommended in the first instance, the following conditions should be imposed on a development approval where on-site shelter in a building is proposed: a. The on-site shelter must be designed and constructed in accordance with the **Building** Code of Australia and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). The design must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. b. Prior to occupation of the development, a final inspection of the on-site shelter must be undertaken by a

				assessment expertise, accredited with Engineers Australia. The fire engineer should provide certification, to the satisfaction of the local government, that the works have been completed in accordance with the requirements of the BCA and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). c. Prior to occupation of the development, an on-site shelter maintenance plan must be prepared by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia, and must include: i. details of maintenance requirements; ii. and details of annual testing requirements for operational compliance.	suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. The fire engineer should provide certification, to the satisfaction of the local government, that the works have been completed in accordance with the requirements of the BCA and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). c. Prior to occupation of the development, an on-site shelter maintenance plan must be prepared by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia, and must include: - details of maintenance requirements; - and details of annual testing requirements

				This has not been stipulated in the application.	for operational compliance. This has not been stipulated in the application.
		12. Surprisingly, given the risk and non-compliances, there is no apparent reference to consultation with the local 'on the ground' emergency services regarding the proposed development	12. As a planner, I've never heard of any requirement or procedure for applicants to consult local emergency services, and I'm guessing as an architect you've never either.	12. Dismiss - local 'on the ground' emergency services; have advised that in the event of a fire in Point Henry they will not be accessing the area rather they will be placing road blocks to let people out and prevent others from getting in.	12. Dismissed
		13. The boundaries of the Lots in the area are required to remain unfenced to due to emergency evacuation requirements and control of fire, and gates are to be	13. Not part of the proposal.	13. Uphold – under Local Planning Scheme No. 2 Cl 5.24.3 o) Boundary	13. Upheld - under Local Planning Scheme No. 2 Cl 5.24.3 o)

		unlocked. This coupled with the proposed site plan and peripheral driveways reduces the amenity of neighbouring properties. The applicant has addressed concerns about site vehicle access via Magpie Rise by saying that they would chain off that roadway – which would suggest that the safety requirements for an already vulnerable site could be compromised by the venue operations. Seems to be an unachievable assurance by the applicant to deflect neighbour concerns.	Nope, I never said that, and a <u>chained</u> gate in the country doesn't always mean a <u>locked</u> gate, but you wouldn't know that in the City. Is the Shire blindly agreeing with everything this complainant says, or making their own assessment and decisions? Seriously.	fences are not to be erected on lots with coverage of more than 80% natural vegetation which would mean the boundaries adjacent the 'rural residential' zoned land should not be fenced. Access to the site by Magpie Rise would need to remain unchained and provide an alternative access to the site.	Boundary fences are not to be erected on lots with coverage of more than 80% natural vegetation which would mean the boundaries adjacent the 'rural residential' zoned land should not be fenced. Access to the site by Magpie Rise would need to remain unchained and provide an alternative access to the site.
		14. While a detail of the proposed signage for the site has been provided, the locations of these are not shown on the submitted	14. Look harder. Shire couldn't bear to say 'Not	14. Note – the proposed signage will be located on site on the entry	14. Noted

		plans.	Upheld' - interesting.	points to the site.	
		15. There are a number of references to restricted water supply and potential shortages in local planning documents including Section 6.2 of the Point Henry Limited Rural Strategy 1991 and Section 6.16.2 (c) of the Shire of Jerramungup Local Planning Strategy 16.	15. As identified in the planning report.	15. Note – there is no reticulated water on the site.	15. Noted
		17. Potable water supply is noted to be supplied via roof capture which is impossible from the Eco Tents as they do not have gutters and are a significant distance from any hard-roofed structures) - with water cartage being proposed to top up the tanks when water levels are low. This is not a sustainable water source	16. I'm not sure you know what carted water is.	16. Note – Potable water is to be supplied by water tanks, to be pumped/gravity-fed rainwater, and topped up by carted water if required. Given that the eco-tents don't have gutters the water tanks for then will be required to be carted	16. Noted
		18. The water use expected from 240+ persons on site will be significant, but there is no detailed water use (occupancy numbers and water usage per day etc) and associated supply/rainfall analysis provided with the application for the existing buildings and the proposed toilet block and additional 10x Eco Tents and other buildings. This is particularly important as the main event periods and maximum site occupancy will be during the drier months of the year when rainfall will be at its lowest	17. Where did you get 240+ person from? Will consult plumber at the Building Permit phase (not a planning issue).	17. Uphold in part – the proposal is outlined as a wedding venue for up to 120 people including the 10 Eco tents. No detailed water usage per day has been provided with the application.	17. Upheld in part – the proposal is outlined as a wedding venue for up to 120 people including the 10 Eco tents. No detailed water usage per day has been provided with the application.

		19. To have minimal environmental impact on the environment and adjacent waterways (including Salt Cove) the applicant should be able to demonstrate that there would not be discharge or runoff from the proposed effluent systems.	18. Did you not read Appendix B with the ATUs in i and the Utilities & Infrastructure section in the report?	18. Note– Aerobic Treatment Units (ATU) are proposed to be used for the Eco Tents.	18. Noted
		20. The submitted Appendix A 'Soil and Site Evaluation' is not related to the current application and the proposed effluent disposal locations. It relates to a previous application for an Ancillary Dwelling and Workers Accommodation on the site.	19. The distance between system areas (approved and proposed) is mere metres away, unlikely to differ, and the Shire can have a updated report if only they asked for one.	19. Uphold – Appendix A 'Soil and Site Evaluation' is not related to the current application and the proposed effluent disposal locations. /it relates to an earlier application and is not sufficient to recommend approval for the development.	19. Upheld - Appendix A 'Soil and Site Evaluation' is not related to the current application and the proposed effluent disposal locations. /it relates to an earlier application and is not sufficient to recommend approval for the development.
		21. The submitted Appendix B 'Wastewater Report' is not a report or detailed study based on the Applicant's proposal. It is simply a quotation and proposed product details, without reference to specific locations, lengths of effluent drains etc.	20. So you did read it. Then why point #18? Because this is a Development Application, not a Building Permit (not a planning issue and inconsequential).	20. Uphold - Appendix B 'Wastewater Report' is not a report or detailed study based on the Applicant's proposal. It is simply a quotation and proposed product details and is not sufficient to recommend approval for the development.	20. Upheld - Appendix B 'Wastewater Report' is not a report or detailed study based on the Applicant's proposal. It is simply a quotation and proposed product details and is not sufficient to recommend approval for the development.

		22. While individual onsite waste water treatment systems and associated discharge drains are proposed for each building/tent, the site slope contour analysis in the Point Henry Limited Rural strategy 1991, identified that the area proposed for the Eco Tents is located within an area exceeding 14% gradient which was 'too steep to consider' for septic absorption and dwelling purposes.	21. An issue for the soil report and plumber to resolve minor details. You know you can pump poo uphill, don't you?	21. Uphold – given the topography for the Eco – Tents on the eastern boundary runs between 20% and 40% there may be construction issues regarding access and effluent disposal	21. Upheld - given the topography for the Eco – Tents on the eastern boundary runs between 20% and 40% there may be construction issues regarding access and effluent disposal.
		23. There is no detail provided on how vehicles (including delivery and water cartage vehicles) will access the site, or where they will park for the proposed Events and Reception area being applied for.	22. The Shire did not raise traffic issues, nor request a traffic report. Why does it matter how they will access the site, the surrounding road network are public roads for public use, not exclusive, private driveways for your brother, maintained by ratepayers at large. Onsite, the Master Plan	22. Uphold - No traffic impact assessment has been provided with the application and as such there is insufficient information to determine the application.	22. Upheld - No traffic impact assessment has been provided with the application and as such there is insufficient information to determine the application.

			illustrates two parking areas around the wedding oval, with one noted proposed 'service access', which means service vehicles and deliveries.		
		24. Showing 'future development' stages on the application plan is confusing. It is very unclear which roads and parking areas are to be included in the current application to be able to assess the proposal, and the number of parking spaces listed in the Report do not correspond to the Masterplan provided.	23. With the application form, Planning Report, and heavily notated plans, it can be established what is proposed. However for clarity and available time, future development has been removed from the Master Plan.	23. Uphold – confusion over which stages are 'future development' It is very unclear which roads and parking areas are to be included in the current application to be able to assess the proposal, and the number of parking spaces listed in the Planning Report do not correspond to the Masterplan provided.	23. Upheld - confusion over which stages are 'future development' It is very unclear which roads and parking areas are to be included in the current application to be able to assess the proposal, and the number of parking spaces listed in the Planning Report do not correspond to the Masterplan provided.
		25. Given that up to 140 guests are accommodated at each event (refer to the wedding packages offered on the Applicant's website), the provision of 12x car bays (as per Report numbers) is insufficient. At 4x occupants per car, this	24. The proposal is clearly stated for 120 guests, including accommodated.	24. Uphold – up to 140 guests are accommodated at each event (refer to the wedding packages	24. up to 140 guests are accommodated at each event (refer to the wedding packages offered on the

		will only allow onsite parking for 48 guests in cars. If guests are expected to park on the perimeter access roads or off-road, this will impact both neighbouring properties, access for emergency services and the natural vegetation.	Agreed, noted that the report was inaccurate and has been updated - The wedding area has 12 +12 (in aisles) for cars, total 52 onsite and a bus bay. At 4 persons per car (your ratio), this equates to 208 persons in lieu of 120. Shire Scheme and Policy doesn't say how many bays are required except 1 per accommodation, and fails to offer an opinion in this schedule or the council report. Wedding venues are never co-booked with other accommodation guests, meaning the car bays for	offered on the Applicant's website), and only 40 car bays are proposed although only 12 are for weddings, 3 are ACROD, 5 for delivers 19 for accommodation units and 1 bus bay.	Applicant's website), and only 40 car bays are proposed although only 12 are for weddings, 3 are ACROD, 5 for delivers 19 for accommodation units and 1 bus bay.

			accommodation is concurrently wedding parking. Guests are not expected to park on the boundary.		
		26. The report notes that 'with regard to liquor licencing, advice previously sought...confirmed that liquor licence is not required without the sale or supply of alcohol'. This may be technically accurate, but alcohol is and will be supplied as part of the proposed wedding/function use. The business's own website advertises 'cocktail weddings' and lists 4 bar staff as part of its packages. Exemptions for small functions only apply where alcohol is served to persons over 18, no earlier than 6am and no later than 10pm, and for a maximum of 2 continuous hours for up to 100 attendees, or 4 continuous hours for up to 75 attendees. The proposed wedding hours of 12 noon to midnight make it virtually impossible for these exemption conditions to be met.	25. As the Shire should be abundantly aware, liquor is controlled by the DLGSGL under separate legislation, not Local Government. It includes an application with certificates from the Shire that all works have been approved, and inspection by the Dept of constructed works, <u>after</u> the DA. The Shire has <u>no jurisdiction</u>, demanding only a 'noted' or 'not upheld' response, i.e. it	25. Uphold - Exemptions for small functions only apply where alcohol is served to persons over 18, no earlier than 6am and no later than 10pm, and for a maximum of 2 continuous hours for up to 100 attendees, or 4 continuous hours for up to 75 attendees. The proposed wedding hours of 12 noon to midnight make it virtually impossible for these exemption conditions to be met and the appropriate liquor licence should be sought.	25. Upheld - Exemptions for small functions only apply where alcohol is served to persons over 18, no earlier than 6am and no later than 10pm, and for a maximum of 2 continuous hours for up to 100 attendees, or 4 continuous hours for up to 75 attendees. The proposed wedding hours of 12 noon to midnight make it virtually impossible for these exemption conditions to be met and the appropriate liquor licence should be sought.

			is an *ultra vires* issue and clearly fails the Newbury Test.		
		27. The Applicant states that the maximum number of occupants on site at any one time will be 120 guests (adults and children), including guests staying in the eco-tents. However, the business's own website advertises wedding packages for up to 140 guests, and there is no undertaking that the eco-tents would be reserved exclusively for event guests. We estimate that total site occupancy could reach up to 240 persons, which is well in excess of the 122 figure cited in the report.	26. Your assumptions are <u>wildly</u> overestimating numbers and deliberately misleading. Wedding sites are never co-booked, and the Planning Report clearly states 120 guests (<u>including</u> accommodated), which is <u>half</u> your unfounded estimate.	26. Uphold – the report states a maximum occupancy of 120 guest but the webpage currently advertises packages for up to 140 guests. Whilst it is stated that the Eco tents are to be occupied by wedding guest there is no guarantee that these would be exclusively for event guests which would result in more being on site that stated in the report.	26. Upheld - the report states a maximum occupancy of 120 guest but the webpage currently advertises packages for up to 140 guests. Whilst it is stated that the Eco tents are to be occupied by wedding guest there is no guarantee that these would be exclusively for event guests which would result in more being on site that stated in the report.
		28. Accessible parking bays are noted in the report, but the proposal does not identify which eco-tent will be configured for guests requiring level or ramped access, or specify internal layouts suitable for wheelchair users. At least one of the 10 proposed tents and the access path from the car bay to that tent must comply with AS 1428.1. The additional footprint required for an accessible tent will necessitate further vegetation clearing.	27. Additional clearing may (or may not) be required, but not protected species. There seems to be an implied argument that no	27. Uphold - Accessible parking bays are noted in the report, but the proposal does not identify which eco-tent will be configured for guests requiring level or ramped access, or specify internal layouts	27. Upheld - Accessible parking bays are noted in the report, but the proposal does not identify which eco-tent will be configured for guests requiring level or ramped access, or specify

		The size and internal configuration of the accessible toilet in the proposed toilet block also does not comply with AS 1428.1. Further site works and clearing would be required to achieve a compliant building design.	vegetation can be cleared, and if proposed, it renders the application incapable of approval, which is obvious nonsense in a locality with 100+ houses, driveways and firebreaks, and a planning report that identified all protected species located by the Shire's Veg Mgt Study, which is all on the western portion of the lot, as shown on the Master Plan. The dimensions of the disabled toilet was taken from an approved toilet block; and all AS requirements will be assessed under the **BCA** in the **Building**	suitable for wheelchair users. At least one of the 10 proposed tents and the access path from the car bay to that tent must comply with AS 1428.1. The additional footprint required for an accessible tent will necessitate further vegetation clearing.	internal layouts suitable for wheelchair users. At least one of the 10 proposed tents and the access path from the car bay to that tent must comply with AS 1428.1. The additional footprint required for an accessible tent will necessitate further vegetation clearing.

			Permit (not a planning issue).		
		29. The report describes the closest dwelling as being at a 'considerable distance' of 395 metres. However, the application fails entirely to identify the existing dwelling owned by Hillboi Nominees, which is approximately 240 metres away. This property does not appear on the application at all.	28. Agreed, this house was not noticed in the Locality Plan, which has been updated. It is 380m+ from eco-tents and 440m+ from the wedding oval. All considerable distances	28. Uphold – the dwelling in question is the closet to the development and is not shown on the plan as it is behind the legend.	28. Upheld - the dwelling in question is the closet to the development and is not shown on the plan as it is behind the legend on one of the maps.
		30. The proposed access roads to the perimeter of the site affects the amenity of adjacent residents by bringing vehicles close to the neighbouring properties, contributing to additional noise and dust impacts.	29. But it's fine for your property to have an battle-axe access leg in the exact same area, with a new, dusty limestone driveway in May 2026? The arrogance is staggering.	29. Uphold – having the road along the northern boundary will impact on adjacent dwelling through additional noise and dust impacts	29. Upheld having the road along the northern boundary will impact on adjacent dwelling through additional noise and dust impacts
		31. The proposed management plan for vehicle access to/from the site has not been confirmed – while Horse Hill Road is considered the 'main entry' there will be additional vehicle movements via Magpie Rise, particularly for access to Short Beach.	30. The Shire did not raise traffic issues, nor request a traffic report, and one can be easily produced.	30. Uphold - in the absence of a traffic impact assessment there is insufficient information to determine the application.	30. Upheld - in the absence of a traffic impact assessment there is insufficient information to determine the

					application.
		32. No fencing or locked gates are permitted to the boundaries due to the high fire risk of the Peninsula. Guests unfamilar with the site could inadvertently wander onto adjacent properties	31. Not part of this application. Also, see Master Plan Legend on the gate stating 'unlocked'. Which is it, you want the property all locked-up, or open. Make up your mind.	31. Uphold – under Local Planning Scheme No. 2 Cl 5.24.3 o) Boundary fences are not to be erected on lots with coverage of more than 80% natural vegetation which would mean the boundaries adjacent the 'rural residential' zoned land should not be fenced.	31. Upheld - under Local Planning Scheme No. 2 Cl 5.24.3 o) Boundary fences are not to be erected on lots with coverage of more than 80% natural vegetation which would mean the boundaries adjacent the 'rural residential' zoned land should not be fenced.
		33. The proposed site and Point Henry in general are identified as being subject to high fire risk which is outlined in a number of the Shire's Planning Policies and documents.	32. Noted.	32. Uphold – Point Henry is identified as being subject to a high fire risk.	Upheld - Point Henry is identified as being subject to a high fire risk.
		a) While the applicant notes that the site is zoned 'Rural' and not 'Rural Residential' it IS located in very close proximity to sites that are required to address and comply with the Local Planning Policy LPP18 Point Henry Fire Management Plans.	a) Thank you for agreeing with the planning report that this policy is not does not apply to Rural lots, and is not relevant.	a) Note – 'rural residential' zoned land is to comply with LPP18 Point Henry Fire Management Plans	Noted
		b) Intensifying the occupancy of the site with additional visitors and overnight	b) Read the BMP & BEP.	b) Uphold – overnight	Upheld - overnight accommodation by

		accommodation significantly raises the risk of potential fire-events occurring that impact the site and the surrounding area. Particularly where guests are likely to be unfamiliar with the area, site and evacuation procedures in a high-stress urgent scenario. c) Therefore a very high level of scrutiny and assessment of the risk of damage and loss of life from fire events should be applied to the application, over and above the LPP18 requirements, which assumes low-intensity development and occupancy numbers on the peninsula (and very-low development on the Rural lots). d) Noting that while a fire shelter is proposed to ameliorate the risk to life for guests and residents on the site, there is minimal information about the proposal to convert the existing shed – which will require a very large cleared area, emergency power (generator) and communications, and mechanical ventilation etc. However, shelters should only be considered as a measure of 'last resort' and the detail of how the site would be managed and fire events dealt with is lacking with the absence of a Bushfire Emergency Plan, DFES and local brigade responses as already noted under 'insufficient information'.	c) Thank you for clarifying that this policy is not does not apply to Rural lots, and is not relevant. Read the BMP & BEP. d) Read the BMP & BEP. It's not a very large clearing, read the BMP. Subject to a Building Permit.	accommodation by additional visitors significantly raises the risk of potential fire-events occurring that impact the site and the surrounding area. c) Note d) Uphold - The Shed which is being converted into a fire shelter would need to comply with the following: While closure and early evacuation are recommended in the first instance, the following conditions should be imposed on a development	additional visitors significantly raises the risk of potential fire-events occurring that impact the site and the surrounding area Noted Upheld - The Shed which is being converted into a fire shelter would need to comply with the following: While closure and early evacuation are recommended in the first instance, the following conditions should be imposed on a development approval where on-site shelter in a building is proposed:

				approval where on-site shelter in a building is proposed: a. The on-site shelter must be designed and constructed in accordance with the Building Code of Australia and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). The design must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. b. Prior to occupation of the development, a final inspection of the on-site shelter must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. The fire engineer should	The on-site shelter must be designed and constructed in accordance with the Building Code of Australia and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). The design must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. Prior to occupation of the development, a final inspection of the on-site shelter must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. The fire engineer should provide certification, to the satisfaction of the local government, that the works have been completed in accordance with the requirements of the BCA and the ABCB Design and Construction of Community Bushfire

				provide certification, to the satisfaction of the local government, that the works have been completed in accordance with the requirements of the BCA and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). c. Prior to occupation of the development, an on-site shelter maintenance plan must be prepared by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia, and must include: details of maintenance requirements; and details of annual testing requirements for operational compliance. This has not been stipulated in the application.	Refuges Handbook (2014). Prior to occupation of the development, an on-site shelter maintenance plan must be prepared by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia, and must include: i. details of maintenance requirements; ii. and details of annual testing requirements for operational compliance. This has not been stipulated in the application.

		34. While the Bushfire Management Plan has identified that the Eco tents are not required to have an APZ (clearance) around each tent as they are considered indefensible assets (i.e. allowed to burn), this does not address the increased risk of a fire event resulting from additional occupancy on the site, particularly by guests potentially unfamiliar with the area and the risk of fire. One recent incident known to the respondent was that a fire at Short Beach was started due to neglect by short-stay guests. This was at a single dwelling with an APZ. The risk of unintended and accidental fire incidents increases with additional site occupancy e.g. generators, lithium batteries, candles, guests smoking etc. Intensifying the occupancy of the site with additional visitors and overnight accommodation raises the risk of potential fire-events occurring on the Lot.	33. Increased risk does not mean unacceptable risk that is incapable of approval. And I suggest one understands the Bushfire Guidelines' stance on 'tolerable loss' structures. I'll always rely on the opinion of a highly trained and experienced Level 3 Bushfire Consultant over an architect or planner on bushfire issues.	33. Uphold - Whilst the Bushfire Management Plan has identified that the Eco tents are not required to have an APZ (clearance) around each tent as they are considered indefensible assets (i.e. allowed to burn), this does not address the increased risk of a fire event resulting from additional occupancy on the site, particularly by guests potentially unfamiliar with the area and the risk of fire. Intensifying the occupancy of the site with additional visitors and overnight accommodation raises the risk of potential fire-events occurring on the Lot.	33. Upheld - Whilst the Bushfire Management Plan has identified that the Eco tents are not required to have an APZ (clearance) around each tent as they are considered indefensible assets (i.e. allowed to burn), this does not address the increased risk of a fire event resulting from additional occupancy on the site, particularly by guests potentially unfamiliar with the area and the risk of fire. Intensifying the occupancy of the site with additional visitors and overnight accommodation raises the risk of potential fire-events occurring on the Lot.

		35. The applicant has only stated in the Planning report that 'it is reasonably forseeable that this application will comply with the Noise Regs and therefore an Acoustic Report has not been prepared', and that 'noise has also been considered unlikely to be an issue'. Given that the proposed use of the site includes 1 main event per week (up to 140 guests based on the business' advertised wedding packages) 1x 'Wellness Event' per week in summer, 4-5 deliveries per week which could include water trucks, and 10 Ecotents (guests arriving and leaving at various times), the impact on neighbouring residents could be significant. Noise will be generated by: • Amplified music and PA • Generator(s) • Guest voices • Vehicles driving on site, particularly on the unsealed access roads (to the perimeter of the site), including buses and delivery/service vehicles.	34-36. Not all applicants have the luxury of big-end of town budgets like you Michael, to waste on unnecessary reports. Acoustic reports are rare in DA's, especially in rural WA, and it would be a disservice to a mum & dad customer to provide one without any identified need. Furthermore, the Shire never advised of any noise concerns, nor provided an opportunity to provide a report. Given the distances and contours, and our experience with several like-developments with Noise	34. Uphold – The development is required to comply with the Environmental Protection (Noise) Regulations 1997. The report states that an Acoustic Report has not been prepared. It is considered that this is a deficiency in the application given the usage of the site including amplified music and a PA and that an Acoustic Report should have been prepared and as such the development should not be approved.	34. Upheld - The development is required to comply with the Environmental Protection (Noise) Regulations 1997. The report states that an Acoustic Report has not been prepared. It is considered that this is a deficiency in the application given the usage of the site including amplified music and a PA and that an Acoustic Report should have been prepared and as such the development should not be approved.
		36. It is also proposed that events could be running until 12:00 midnight, held least 1x per week during the summer season.		35. Note - an Acoustic Report should have been prepared	35. Noted
		37. To demonstrate that the development will comply with the minimum Regulations for noise, acoustic testing should be a requirement for consideration of the application. It is insufficient to rely on the applicant's opinion that noise is unlikely to		36. Note - an Acoustic Report should have been prepared.	36. Noted

		be an issue.	Reports, we know will noise comply with the Reg's.		
		38. Additional internal vehicle roads and pedestrian pathways are proposed on the site but will not be sealed. This increases the potential of dust-drift onto neighbouring properties, particularly with the strong winds in the area.	37. The Shire never advised of a dust issue, and frankly, it's a little bit ludicrous for a 100 acre property in the country. It's also incredulous when you brother has since constructed a limestone driveway along the battle-axe leg which will create the dust you say is unacceptable.	37. Uphold – A dust management plan should have been prepared and lodged as part of the application and as such the development should not be approved.	37. Upheld - A dust management plan should have been prepared and lodged as part of the application and as such the development should not be approved.
		39. The site has already been used for wedding functions for up to 3 years as evidenced by the applicants Instagram account. There appears to be an intensive commercial business already operating from this Rural site without Shire approvals.	38. Noted.	38. Uphold – It is noted that this activity has been ongoing for some time and this is the subject of ongoing compliance action.	38. Upheld - It is noted that this activity has been ongoing for some time and this is the subject of ongoing compliance action.
		40. It is stated in the application that an Ancillary Dwelling and Workers Accommodation (2 bedroom) have already been approved by the Shire (2023/2024?) – but these are yet to be constructed. These two dwellings already represent an	39. Clearly not part of this application.	39. Uphold - the application that an Ancillary Dwelling and Workers Accommodation (2 bedroom) have already	39. Upheld - the application that an Ancillary Dwelling and Workers Accommodation (2

		intensification of the use of the Rural site, but we assume that the approvals were subject to the same planning, environmental and safety considerations as required to be assessed as 'Additional Dwellings' under Clause 5.25.4 the Local Planning Scheme No. 2.		been approved by the Shire on 24/04/2023 this application has lapsed and a building permit was never issued. The approval was for an ancillary dwelling and worker accommodation (unlisted use) therefore outside of Clause 5.25.4 of Local Planning Scheme No. 2.	bedroom) have already been approved by the Shire on 24/04/2023 this application has lapsed and a building permit was never issued. The approval was for an ancillary dwelling and worker accommodation (unlisted use) therefore outside of Clause 5.25.4 of Local Planning Scheme No. 2
		41. The proposed use of dwellings (both existing and proposed) and the lack of a suitable alternative water supply are of concern for any additional dwellings on the site under the Shire's Rural Zone requirements. The additional intensity of use being proposed with the current application is far in excess of this limitation.	40. Read Utilities & Infrastructure section in the Planning Report again.	40. Note – the proposed dwellings approval has lapsed	40. Noted
		42. The proposed Ancillary Dwelling and Workers Accommodation building locations appear to have been moved to different locations on the site when compared to the plan in the provided site soil condition report included with this application. Does the Shire consider that a change of location of a	41. Clearly, not part of this application, and by others.	41. Note – the proposed dwellings approval has lapsed.	41. Noted

		proposed building would require an amended (or new) planning application?			
		43. The existing 170m2 dwelling and 216m2 shed are noted to be 'existing' structures, but no details have been provided in the application. They are identified as not approved and the application notes that these are 'exempt structures of a minor nature formally being claimed'.	42. First read the exemption clauses in the Planning Reg's, then argue your point (if you still have one).	42. Uphold – the existing 170m2 dwelling is unapproved and was renovated without any approvals being issued. The 216m2 shed is a Class 10 structure which is exempt under Schedule 4 of the Building Regulations 2012. It is noted that the 216m2 shed is proposed to be converted to a fire shelter. The requirement for a fire shelter are address under point 32 d).	42. Upheld - the existing 170m2 dwelling is unapproved and was renovated without any approvals being issued. The 216m2 shed is a Class 10 structure which is exempt under Schedule 4 of the Building Regulations 2012. It is noted that the 216m2 shed is proposed to be converted to a fire shelter. The requirement for a fire shelter are address under point 32 d).
		44. From the report 'The property has recently been purchased by the Client, and it is suspected that some development is not reflected in documents from the City'. RP Data reveals that the property was purchased in 2021 which stretches the definition of 'recently'.	43. A subjective, argumentative and pointless issue to raise.	43. Note – the property was purchased on 2021 which is not considered recently	43. Noted

		45. The existing dwelling is referred to in the application as the 'Homestead', 'Old House' etc. – which creates the impression that the dwelling is historical or of some merit. It was in fact marketed by the property sales agent as 'an unfinished brick home'. It is therefore highly likely that it was also not issued with a Building Permit and therefore may not meet minimum building standards for safety, energy efficiency, sanitary facilities etc. for a dwelling at the time it commenced construction. Yet the application plans show this dwelling as being the 'reception' or check-in facility (and used for commercial purposes).	44. It is a homestead and I never mentioned an old house, so the impression is only in your head, Michael. Beyond the scope of my engagement, and the Shire never raised as an issue.	44. Uphold - – the existing 170m2 dwelling is unapproved and was renovated without any approvals being issued. The house was inspected and the following was sent to the real estate agent dealing with the sale: 'There are no approvals on Shire records for the property, so the house, sheds, and tanks will require retrospective approval if they are to be continued to be used. This will require inspection, assessment, and requirements outlined by a private surveyor/certifier in order for them to issue a Cert of Building Compliance (CBC). This will then form part of an application for Building Approval which is to be lodged with the Shire (can forward a blank application	44. Upheld - the existing 170m2 dwelling is unapproved and was renovated without any approvals being issued.

				form when ready). The certifier/surveyor will need to determine the specific requirements to gain the CBC though the likely items are to be: • Approval (and likely inspection) by a structural engineer ○ The walls appeared ok with some moderate cracking in the internal south eastern walls ○ The adequacy of footings would require site investigation ○ It has been a flagged that the footings below the laundry may not be structurally sufficient (verbal conversation) • The existing septic system would need health approval and inspection/approval by a registered plumber • The gas system would also need approval	

				from a registered plumber • The gap in the external south eastern external wall brickwork to be flashed • The roof space was sealed off and could not be inspected • No apparent asbestos material, though this would require verification by material testing • Fireplace to be in accordance with the Building Code • Window frames to be properly sealed. South eastern window glazing to be replaced • The lighting switches had exposed electrical cabling (sheathed) in the internal brick walls • The sheds also require structural engineer certification • Following items would likely be needed	

				○ BAL Assessment & Report ○ Building would need to meet determined BAL rating (screens to doors/windows, gaps les than 2mm sealed, sarking to roof cladding etc.) ○ Energy efficiency report (may require new glazing, additional insulation to walls and roof space) ○ Registered electrician certificate ○ Registered plumbers certificate for sewerage and gas systems ○ Termite assessments and possible treatment There may be work required to be able to satisfy the above points.'	
		46. Notwithstanding, even if the existing 'shed' is considered by the Shire as an exempt structure, it is now proposed to be the bushfire shelter for the site - which will require planning approval (including APZ/bushfire compliance) and a Building	45. The Master Plan clearly breaks-up development into 'existing' 'proposed' and	45. Note – The bushfire shelter is a key component of the development. The standards that the	45. Noted

		Permit application. The application should not be considered without including the fire shelter as part of the proposal given it's impact on the existing vegetation.	'future', including colour-coding for clarity. The shed is clearly shown as existing, and the shelter as proposed.	bushfire shelter is required to comply with is shown at Submission 32. d).	
		47. The application includes the use for Wedding Receptions as if this is a new development, however it is clear from the Salt Cove website https://www.saltcovebremerbay.com.au/ that the applicant has been illegally using the site as a wedding venue for "up to 140 Wedding guests" for over 3 years which is confirmed by their Instagram page with wedding events dating back to November 2022.	46. At the time of lodgement, weddings were not being carried out, and the application is therefore prospective.	46. Noted – the current application contains a number of retrospective elements and there is ongoing compliance with the historic use of the site.	46. Noted
		48. It also appears that the site has been cleared in areas for the purpose of camping sites with recent aerial photography showing a number of campsites being utilised which may have required Shire approval and may contravene the Caravan Parks and Camping Grounds Regulation 1997.	47. Not part of this application.	47. Noted – the proponent was advised to cease utilising the site as a caravan park and it is understood that this use has stopped.	47. Noted
		49. What is being proposed (Reception Centre/Wedding Venue) and planned in the future for the site is **NOT** low impact development and is **NOT** retaining and protecting the existing natural environment on the site, as evidenced by the proposed '**future uses'** shown on the current	48. Subjective argument, especially for a 100 acre site. Not all vegetation is protected.	48. Noted - any expansion of the uses on the site would be subject to another Development Application.	48. Noted

		application.	'Possible future' development strongly suggests not part of this application. I can **SHOUT** too.		
		50. The number of toilets included in the 'demountable' toilet block, which the applicant notes could allow for up to **250 patrons**, which is in excess of the capacity of stated guests to be accommodated on site (120 guests maximum, but weddings cater for up to 140 guests). Why are so many toilets being included in this stage if they are capping the guest numbers at 120/140?	49. Thank you for highlighting that the proposal complies.	49. Dismiss - the proposal has proposed a toilet block that could cater for 250 people. The required facilities for a number of people is a minimum standard and there are no restriction providing over and above the minimum level of ablutions.	49. Dismissed
		51. The Shire should at the very least require the applicant to **remove all references to future plans** for the site (Caravan sites, Central 'facilities', accommodation Chalets) and resubmit **to ensure that there is no ambiguity** about what is being applied for with this application.	50. Clearly Michael doesn't know what is the legal or common-knowledge meaning of 'future possible', and in conjunction with the application form and planning report,	50. Uphold – if the development was to be approved all references to future plans will be marked as 'Deleted from this Application'.	50. Upheld - if the development was to be approved all references to future plans will be marked as 'Deleted from this Application'

			none of this is part of the application. Notwithstanding this, there is no pompous pride in removing such from the plans, if only the Shire bothered to mention their concern in a 2 minute email.		
		52. The standard of the documents submitted by the applicant are of a very poor standard including the very basic 'Master Plan' which has been drawn inaccurately where the scale bar is not in proportion to the plans and would suggest that distances are inaccurate including travel distances for emergency evacuation purposes.	51. The plans have been drafted on professional software, and clearly are not to a poor standard; and the bushfire specialist drew their own plans. The scale bar is accurate, it's just in a format using artistic licence, something an architect abundantly knows, which only demonstrates your obvious	51. Uphold - a number of the documents were of a poor standard in particular Appendix A and B.	51. Upheld - - a number of the documents were of a poor standard in particular Appendix A and B.

			extreme arrogance and unprofessionalism.		
		53. Again, we state that the Shire should reject this application in its entirety.	52. Noted.	52. Note – request to refuse application.	52. Noted
14.	Lyn & John Chadwick	1. After phone conversations with Isaac Baum and your office, we have decided that we have no objection to the controlled development of the site. We rely on the Shire, with the oversight of the elected councillors, to make decisions in the best interests of the ratepayers. If the proposal meets the planning requirements, at this stage, we see no reason to challenge the development	Support noted and appreciated.	1. Noted - Support	1. Noted
15.	Alan & Jacqui Bean	1. strongly opposed to the development next door for the following reasons a) Suitability of site - we have purchased a special rural block surrounded by other special rural blocks and 2 adjoining rural blocks. As the rural blocks are surrounded by rural residential homes we feel this development will change the peaceful nature of our area. We are aware that rural farms are suitable for chalets or low key campsites but in our opinion the existing businesses such as Tozer's Bush Camp have no close neighbors to impact. b) Fire Risk - we feel that having tourists camped in the bush is a recipe for disaster	a) Different sites, zones, planning controls and proposals. b) See BMP.	1. Note – opposed to the development. a) Note b) Noted - the proponent	1. Noted a) Noted

		as it only takes one cigarette or an illegally lit fire pit to burn out the neighbours, especially risky with the consumption of alcohol during weddings. Once again, campsites like Tozer's are much more defendable in a bushfire and pose less threat to neighbors. In event of a fire from the north it would be very dangerous to exit the property via Horse Hill Road as fires in coastal heath travel extremely fast. The fire shelter would need to be very large for a wedding and of a very high quality to save lives. We also have concerns with lithium batteries used by the eco tents.		was advised to cease utilising the site as a caravan park and it is understood that this use has stopped. The Fire Shelter is a converted outbuilding and it will need to comply with the standards outline in response to Submission 13 32 d). Whilst the site is stated as having limited access to power it is supposition that lithium batteries will be used.	b) Noted
		c) Traffic - already we have been impacted by camping on this property last summer with continuous traffic all day on the unsealed road in front of our home. Weddings also see traffic from buses, deliveries, workers and maintenance vehicles over a few days each time. The proposal mentions possible weddings once a week and yoga retreats as well as short stay tourism. We notice that most guests enter and leave their accommodation at least 3 times per day (60 trips past our house a day) plus	c) Change or increased traffic does not mean not capable of approvable.	c) Uphold - No traffic impact assessment has been provided with the application and as such there is insufficient information to determine the application.	c) Upheld - No traffic impact assessment has been provided with the application and as such there is insufficient information to determine the application.

		staff and deliveries. Weddings bring buses but also many cars. As Horse Hill Road is unsealed we have also experienced major amounts of dust and noise from trucks, trailers and cars on the corrugated road and Lot 112's driveway. Guests leaving at midnight has also bothered us in the past. d) Unsuitable accommodation - we are aware that our area needs more accommodation but eco tents will not be suitable in such a cold windy site for most of the year. Heating would be impossible in winter. Outdoor furniture would blow away. Therefore the proposed eco tents would probably only be rented out during weddings. This does not help the long term need for accommodation in Bremer Bay.	D) Not the neighbours' decision.	d) Noted – the application documents state that the Eco Tents will only be used by in the numbers of the wedding venue. It should also be noted that in general there are opportunities for further eco-tourism developments however the Shire would particularly encourage accommodations that incorporates facilities which can attract visitors in off peak / winter periods.	d) Noted

		e) Rural use - in strategic planning schemes for our area no such tourist development has been mentioned. Purchases of property in our area have been made with the idea that Point Henry would stay rural residential and not commercial/tourism. As lot 112 is not a working farm surely normal uses for rural do not have to apply.	e) It is actually, but it's not a statutory planning matter.	e) Note – the subject site is zoned 'rural' and is one of 3 Lots that were left after the subdivision of Point Henry for 'rural residential' subdivision and development. Use for rural are permitted limited by the vegetated nature of the site, fire risk and limited servicing.	e) Noted
		f) Possible future Caravan Row - we have already experienced camping on lot 112. This was done with no toilets (BYO), rubbish removal or manager on site. We have had rubbish dumped in our bins on the road, people looking for directions to the campsite, witnessed campers on motorbikes entering with no possibility of a toilet on board. We strongly object to camping on this site.	f) Not part of this application, but noted.	f) Uphold– if the development was to be approved all references to future plans will be marked as 'Deleted from this Application'.	f) Upheld– if the development was to be approved all references to future plans will be marked as 'Deleted from this Application'.
		g) Protection of coastal bushland - as far as we can tell there will be substantial clearing of vegetation. As a neighbouring property, we have observed black cockatoos feeding on Lot 112 regularly. On our own property we have kangaroos, echidna, quoll, frogs, monitor lizards and many snakes and small lizards. We also have many species of birds visiting.	g) No, there isn't, that's precisely why	g) Uphold – A vegetation study and fauna study was not provided and the comment in Part 2.3 stating that no wildlife has been observed on site other than transitory	g) Upheld - A vegetation study and fauna study was not provided and the comment in Part 2.3 stating that no wildlife has been observed on site other than transitory birds

			they're called eco-tents.	birds demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.	demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.
16.	Ken Shaw	1. The development outline provided to me is no more than a cursory, concept plan. As such I find it extremely difficult to make a considered relevant and detailed analysis of the proposal. I would therefore be disappointed should Council approve the application. a) My concerns broadly encompass: a)Bushfire. Bushfire - Ability to escape. Potential encirclement. Vehicle access for patrons and fire services. Building suitability in high fire risk environment. Provision of cleared buffer adjacent to individual pergodas. b) Patron safety. Will fencing be provided preventing access to and potential fall from foreshore cliffs.	1. Vague concerns not referencing statutory planning controls. See my arguments elsewhere.	1. Note – insufficient information has been supplied to support this information. a) Note – the site will not be occupied in days with a FDI 75. A fire shelter is also proposed that will need to comply with the standards outlined in the officers comments to Submission 13 32 d) b) Uphold – no safety fencing has been proposed and the lack of detail in respect of	1. Noted a) Noted b) Upheld - no safety fencing has been proposed and the lack of detail in

		c) Sanitary. I think but can not be sure that each pergoda has toilet /basin / sink incorporated. Will septic tanks be required and what will the environmental impact be. d) I can't imagine that patrons will be satisfied with the rudimentary toilet block. e) Future buildings or use as included on the plan. Does the developer expect that Council will provide enduring blanket approval without any detail? f) Environment. What will the footprint be and will it be consistent with zoning and environmental regulations. g) could continue but it will be hypothetical because the legend provided is inadequate and plan scale makes sensible interpretation impossible.		this does not make the proposal supportable. c) Note – no facilities are proposed with the oergoda. d) Note – observation e) Uphold – if the development was to be approved all references to future plans will be marked as 'Deleted from this Application' f) Note - there is a general presumption against clearing native vegetation. g) Note – plan is acknowledged as hard to interpret.	respect of this does not make the proposal supportable. c) Noted d) Noted e) Uphold – if the development was to be approved all references to future plans will be marked as 'Deleted from this Application' f) Noted g) Noted
17.	Simon Yeo	1. The subject land is zoned Rural under the Shire of Jerramungup Local Planning Scheme No. 2 (LPS2). A Reception Centre is not a use contemplated as permitted or discretionary in the Rural zone under the LPS2 Zoning Table. It is, in effect, a prohibited use ('X') in this zone. Tourist	All) Cut and past from Michael Lyons and Jennifer Yeo's (of same address) issues, see my arguments	1. Note -Reception Centre is an unlisted use and is dealt with under Clause 4.4.2 of Local Planning Scheme No. 2, Tourist Accommodation is a 'D'	1. Noted

		Accommodation may be considered discretionary ('A') only if it is clearly ancillary to an active rural or primary production use on the land. No such rural enterprise is evident from the application materials.	elsewhere.	use rather than the 'A' use specified.	
		2. The objectives of the Rural zone under LPS2 are to protect agricultural land, maintain rural character, and prevent inappropriate land use conflicts. The proposed development, which includes a reception/function centre capable of hosting weddings and events, together with 10 short-stay glamping-style eco tents, is a high-intensity, visitor-facing commercial enterprise that is fundamentally inconsistent with these objectives.		2. Uphold - the subject lot is zoned 'rural' but it has not been developed for agricultural activity. The objectives of the 'rural' zone are: To ensure the continuation of broad-hectare farming as the principal land use in the district and encouraging where appropriate the retention and expansion of agricultural activities where the land is capable of such development To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment.	2. Upheld - The proposed use as a reception centre as an unlisted use is not consistent with the objectives for the 'rural' zone.

				To allow for facilities for tourists and travellers, and for recreation uses. To help protect rural land from land degradation and further loss of biodiversity by: a. minimising clearing of remnant vegetation b. encouraging retention and protection of remnant vegetation c. encouraging development and protection of vegetation corridors d. encouraging development of sustainable surface and sub-surface drainage works e. encouraging rehabilitation of salt-affected land f. encouraging soil conservation through land management measures g. encouraging identification and	

				protection of wetlands To promote the sustainable management of natural resources, and the prevention of land degradation. The proposed use as a reception centre as an unlisted use is not consistent with the objectives for the 'rural' zone.	
		3. The planning report also conspicuously fails to mention the very large 45-49 metre bushfire asset protection zone (APZ) required around the proposed bushfire shelter (a converted existing shed). That APZ alone represents over 10,000m2 of cleared bushland.		3. Uphold – The proposal will be required to clear large areas to achieve appropriate BAL ratings as well as access roads for the eco tents. This is not consisted with the objectives of the 'Rural' zone specifically: - To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the	3. Upheld - The proposal will be required to clear large areas to achieve appropriate BAL ratings as well as access roads for the eco tents. This is not consisted with the objectives of the 'Rural' zone.

				natural resources or the environment. and - To help protect rural land from land degradation and further loss of biodiversity by: a) minimising clearing of remnant vegetation b) encouraging retention and protection of remnant vegetation	
		4. The assessment of this application must weigh the main principles underlying the Shire's Local Planning Strategy for Rural Zoned lots, specifically "to protect sensitive and significant environmental areas" and the requirement for "no adverse impacts on the surrounding land and rural activities". The proposal plainly fails on both counts.		4. Uphold – the local planning strategy states 'an overriding consideration is that there should be no adverse impacts on the surrounding land and rural activities.' The proposed development does not meet this standard.	4. Upheld - the local planning strategy states 'an overriding consideration is that there should be no adverse impacts on the surrounding land and rural activities.' The proposed development does not meet this standard.
		5. This application is seeking approval for an intensive commercial operation on land zoned for low-intensity Rural use only. Approving it would create a significantly		5. Uphold - the subject lot is zoned 'rural' but it has not been developed for	5. Upheld - The proposed use as a reception centre on

		higher risk of adverse impacts on the site environment, the Rural character and the amenity of adjoining properties than would ordinarily be expected from a single holiday home or a Rural Home Business under the Shire of Jerramungup Local Planning Scheme No. 2.		agricultural activity. The objectives of the 'rural' zone are: To ensure the continuation of broad-hectare farming as the principal land use in the district and encouraging where appropriate the retention and expansion of agricultural activities where the land is capable of such development To consider non-rural uses where they can be shown to be of benefit to the district and not detrimental to the natural resources or the environment. To allow for facilities for tourists and travellers, and for recreation uses. To help protect rural land from land degradation and further loss of biodiversity by:	tourist accommodation creates a scale of development that is not consistent with the objectives for the 'rural' zone

				a. minimising clearing of remnant vegetation b. encouraging retention and protection of remnant vegetation c. encouraging development and protection of vegetation corridors d. encouraging development of sustainable surface and sub-surface drainage works e. encouraging rehabilitation of salt-affected land f. encouraging soil conservation through land management measures g. encouraging identification and protection of wetlands To promote the sustainable management of natural resources, and the prevention of land degradation.	

				The proposed use as a reception centre on tourist accommodation creates a scale of development that is not consistent with the objectives for the 'rural' zone.	
		6. Tourist Accommodation is a Discretionary use under the Shire of Jerramungup Local Planning Scheme No. 2, meaning planning approval must be obtained. The Shire's own policy is to actively encourage high quality short term accommodation proposals, but only where they are at 'appropriate densities suited to the site location', which 'assist in attracting more tourists into the area during off-peak times', and 'provided that no land use or environmental conflicts arise'.		6. Uphold – the proposed 'tourist accommodation' may have unsatisfactory environmental impacts due to clearing for roads and effluent disposal areas.	6. Upheld - the proposed 'tourist accommodation' may have unsatisfactory environmental impacts due to clearing for roads and effluent disposal areas.
		7. Noting that the application report (Part 4.2 Operational Details) identifies the warmer months as the main season for events, the accommodation tied to those events will do nothing to increase visitor numbers during off-peak periods. The eco-tent accommodation type proposed is well known to the respondent: due to a complete lack of insulation, eco-tents are only genuinely comfortable during a narrow		7. Note - the Shire seeks to actively encourage high quality short term accommodation proposals, they must be at 'appropriate densities suited to the site location'...which 'assist in attracting more	7. Noted

		summer window when conditions are favourable. Their viability for off-peak or off-grid tourist accommodation is, in our view, very questionable and not financially or operationally sustainable outside the peak season.		tourists into the area during off-peak times'...and 'provided that no land use or environmental conflicts arise'. The application report Part 4.2 Operational Details identifies that the main season for events will be during the warmer months, and therefore the associated accommodation occupancy connected to these events will not provide additional accommodation during off peak times.	
		8. The Applicant has omitted a number of critical documents and studies from the Development Application and does not appear to have a thorough understanding of the site topography and conditions in terms of manageable access and construction.		8. Uphold - The Applicant has omitted a number of critical documents and studies in their Development Application. There are question related to the site topography and site conditions in terms of	8. Upheld - The Applicant has omitted a number of critical documents and studies in their Development Application. There are question related to the site topography

				manageable site access, and construction	and site conditions in terms of manageable site access, and construction
		9. The Local Planning Strategy for Area 17 (Point Henry Peninsula) requires all proposals for development on Rural-zoned lots to be assessed against the Point Henry Limited Rural Strategy 1991, and to comprehensively address issues such as environmental assessment, land capability, visual impact, effluent disposal capability, water management and drainage, and servicing. This significant planning document has not been referenced or considered in the Town Planning Report submitted, and the specific issues it requires to be comprehensively addressed have simply not been assessed in any meaningful detail.		9. Uphold – The Point Henry Limited Rural Strategy 1991 identified the subject lots as being highly constrained and as such was excluded from 'Rural Residential' development. The Point Henry Limited Rural Strategy 1991 was not considered in the application and as a consequence the proposal cannot be supported.	9. Upheld - The Point Henry Limited Rural Strategy 1991 identified the subject lots as being highly constrained and as such was excluded from 'Rural Residential' development. The Point Henry Limited Rural Strategy 1991 was not considered in the application and as a consequence the proposal cannot be supported.
		10. The Shire will need to determine whether the site is actually suitable for the intensive commercial uses being proposed. The absence of basic information that could materially affect the site and adjoining neighbours should, in our submission, be grounds enough to reject this application outright.		10. Uphold - the proposed development presents concerns with environmental, commercial, and safety domains and as such should be refused.	10. Upheld - - the proposed development presents concerns with environmental, commercial, and safety domains and as such should be

					refused
		11. The Point Henry Limited Rural Strategy makes clear that the Rural-zoned lots in this area are environmentally sensitive and should not be used for anything beyond low-intensity purposes. Despite this, the Applicant has provided no detailed assessment of the flora and fauna present on the site and no vegetation study whatsoever. The only fauna reference in the report appears under Part 2.3, noting 'no wildlife observed other than transitory birds'. A casual walk through the area regularly reveals kangaroos, other mammals, lizards, reptiles and a variety of insects.		11. Uphold – A flora and fauna study was not provided and the comment in Part 2.3 stating that no wildlife has been observed on site other than transitory birds demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.	11. Upheld - A flora and fauna study was not provided and the comment in Part 2.3 stating that no wildlife has been observed on site other than transitory birds demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.
		12. There is a passing reference to a 'Veg Mgt Study' (not provided), but no environmental report of any kind has been commissioned for this site. The site contains vegetation communities with federal protection status, and without a detailed environmental report the Shire will not be in a position to ensure those communities are not adversely impacted by the proposed development.		12. Uphold – a vegetation management study was not provided. The lack of details does not make the development supportable.	12. Uphold – a vegetation management study was not provided. The lack of details does not make the development supportable.
		13. No detailed site survey has been provided. The site contours shown on location plan D2 do not accurately represent the actual topography when cross-referenced against Landgate resources. Parts of the eastern		13. Uphold - – given the topography of the site as identified in the Point Henry Limited Rural Strategy a detailed site	13. Upheld - given the topography of the site as identified in the Point Henry Limited Rural Strategy a

		corner of the site have a gradient of approximately 1:3, which could require either massive civil engineering works or a bridge to deliver the proposed access road serving the eco-tents. Furthermore, the Point Henry Limited Rural Strategy specifically identified this part of the site as inappropriate for development because of steep gradients, exposure to strong winds and serviceability challenges, as well as a high bushfire risk. The proposed eco-tents are located within what has been assessed as a Flame Zone.		survey with accurate contours has not been provided with the application. Given the slopes that occur towards the coast where the Eco tents are proposed can be up to the 1:3 gradient it will make constructing roads to service these difficult.	detailed site survey with accurate contours has not been provided with the application. Given the slopes that occur towards the coast where the Eco tents are proposed can be up to the 1:3 gradient it will make constructing roads to service these difficult.
		14. Insufficient information has been provided about the design of the proposed buildings and structures to allow any proper assessment of whether the development would be of 'high quality'. The proposed toilet block (described as a 'demountable' in the applicant's report) is non-compliant in terms of DDA access and Building Code requirements.		14. Uphold – there is insufficient information design of the proposed buildings and structures and therefore to ensure that the development is of ‘high quality’ The proposed demountable toilet block does not show how a wheelchair would access the facility as it is raised from the ground.	14. Upheld - there is insufficient information design of the proposed buildings and structures and therefore to ensure that the development is of ‘high quality’ The proposed demountable toilet block does not show how a wheelchair would access the facility as it is raised from the ground.

		15. Point Henry is a well-documented high fire risk area, served by a single access road in and out of the peninsula. That physical reality alone makes it a dangerous location in which to congregate large groups such as wedding parties.		15. Uphold - Point Henry is a known high-fire risk area, with only one access road in and out of the peninsula which makes it a dangerous location for the congregation of large groups such as weddings. The Shed which is being converted into a fire shelter would need to comply with the following: While closure and early evacuation are recommended in the first instance, the following conditions should be imposed on a development approval where on-site shelter in a building is proposed: a. The on-site shelter must be designed and constructed in	15. Upheld - Point Henry is a known high-fire risk area, with only one access road in and out of the peninsula which makes it a dangerous location for the congregation of large groups such as weddings. The Shed which is being converted into a fire shelter would need to comply with the standards outlined under Submission 13 recommendation 32 d)

				accordance with the Building Code of Australia and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). The design must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. b. Prior to occupation of the development, a final inspection of the on-site shelter must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. The fire engineer should provide certification, to the satisfaction of the local government, that the works have been completed in accordance with the requirements of the BCA and the ABCB Design and Construction of	

				Community Bushfire Refuges Handbook (2014). c. Prior to occupation of the development, an on-site shelter maintenance plan must be prepared by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia, and must include: . details of maintenance requirements; i. and details of annual testing requirements for operational compliance. This has not been stipulated in the application.	
		16. Both a Bushfire Evacuation Plan (BEP) and a Landscape Management Plan (LMP) are required fire planning documents for vulnerable land uses. While a Bushfire Management Plan (BMP) has been included with the application, the BEP is referenced within the BMP but has not been provided. The LMP is also absent.		16. Uphold - a Bushfire Evacuation Plan (BEP) and a Landscape Management Plan (LMP) are required fire planning documents for vulnerable land uses were not lodged with the application.	16. Upheld - a Bushfire Evacuation Plan (BEP) and a Landscape Management Plan (LMP) are required fire planning documents for vulnerable land uses

					were not lodged with the application.
		17. The BEP, when it is produced, will need to grapple seriously with several significant risks: a) The single access road from the peninsula, which could need to handle the evacuation of 240+ persons from the site b) The extended distance of over 1 kilometre and difficult terrain that guests would need to traverse to reach the proposed fire shelter (a converted shed), potentially through actively burning vegetation, without any familiarity with the site or surroundings c) Evacuation of guests with mobility limitations, which has not been addressed d) Much of the site being unpowered, raising the question of how evacuation routes and paths would be illuminated e) No detail on how site closure will be managed when the fire risk level (FRL) exceeds 75 as required under the BMP. Sending up to 240 guests back to Perth, some of whom will have travelled		17. Note a) Uphold – the report states a maximum occupancy of 120 guest but the webpage currently advertises packages for up to 140 guests. Whilst it is stated that the Eco tents are to be occupied by wedding guest there is no guarantee that these would be exclusively for event guests which would result in more being on site that stated in the report. b) Noted – Not a fire shelter is proposed on site. c) Uphold – whist the documents lodged with the application show accessible bays and toilets there is no consideration how a	17. Noted a) Upheld - the report states a maximum occupancy of 120 guest but the webpage currently advertises packages for up to 140 guests. Whilst it is stated that the Eco tents are to be occupied by wedding guest there is no guarantee that these would be exclusively for event guests which would result in more being on site that stated in the report. b) Noted c) Upheld - whist the documents lodged with the application show accessible bays and toilets there is no consideration how a

		great distances for a wedding, would simply not be practical f) The period of highest event occupancy directly coincides with the period of highest fire risk		person with mobility issues will evacuate the site. This means the application cannot be supported d) Note – no details have been provided how evacuation routes and paths would be illuminated. e) Uphold - if approved conditions would need to be placed requiring the Shire to be notified of any events and then the forecast is to be used to establish when the sites needs to be closed down. f) Note – statement of fact.	person with mobility issues will evacuate the site. This means the application cannot be supported d) Noted e) Upheld - if approved conditions would need to be placed requiring the Shire to be notified of any events and then the forecast is to be used to establish when the sites needs to be closed down. f) Noted
		18. As a proposed vulnerable use, the BMP is required to be submitted to DFES for approval. Given the very real risks to both property and life, DFES's formal response should be a central part of the decision-making process, yet it is not included in the application documents. It is also notably absent of any reference to consultation with the local, on-the-ground emergency services.		18. Note - local 'on the ground' emergency services; have advised that in the event of a fire in Point Henry they will not be accessing the area rather they will be placing road blocks to let people out and	18. Noted 19. Upheld - under Local Planning Scheme No. 2 Cl 5.24.3 o) Boundary fences are not to be erected on lots with coverage of more than 80%

		19. Lot boundaries in the area are required to remain unfenced due to emergency evacuation requirements and fire control, and any gates must be kept unlocked. The proposed site plan with its peripheral driveways further reduces the amenity of neighbouring properties.		prevent others from getting in 19. Uphold - under Local Planning Scheme No. 2 Cl 5.24.3 o) Boundary fences are not to be erected on lots with coverage of more than 80% natural vegetation which would mean the boundaries adjacent the 'rural residential' zoned land should not be fenced.	natural vegetation which would mean the boundaries adjacent the 'rural residential' zoned land should not be fenced.
		20. The applicant has attempted to address concerns about vehicle access via Magpie Rise by stating they would chain off that roadway. This would suggest that safety requirements for an already vulnerable site could be compromised by the venue's operations. It reads as an unachievable assurance put forward simply to deflect neighbour concerns.		20. Uphold - Access to the site by Magpie Rise would need to remain unchained and provide an alternative access to the site.	20. Upheld - Access to the site by Magpie Rise would need to remain unchained and provide an alternative access to the site.
		21. The BMP states that 'There are no relevant biodiversity or conservation values identified within the subject site or adjacent that would influence the application of the Bushfire Protection Measures', but also concedes that 'The accuracy of this data...should be		21. Uphold – A fauna and vegetation study was not provided and the comment in Part 2.3 stating that no wildlife	21. Upheld - A fauna and vegetation study was not provided and the comment in Part 2.3 stating that no wildlife

		confirmed with the relevant local government authority and/or state agency'. This tells us plainly that the requirement to preserve and minimise clearance of remnant vegetation was never factored into the bushfire management assessment for the site. The 10,000m2 APZ for the fire shelter confirms this.		has been observed on site other than transitory birds demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.	has been observed on site other than transitory birds demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.
		22. Based on inaccurate topographical assumptions, actual site occupant numbers and significant gaps in environmental information, we do not believe the Bushfire Consultant has been provided with adequate information to properly assess the fire risk.		22. Uphold – there are a number of gaps in data and environmental information . Based on tis the proposed development cannot be supported.	22. Upheld - there are a number of gaps in data and environmental information . Based on tis the proposed development cannot be supported.
		23. We also note a number of non-compliances in the BMP that the Shire would effectively be accepting by approving this application, including the maintenance of non-compliant access roads. This transfers risk directly to the Shire.		23. Note	23. Noted
		24. While detail of the proposed signage has been provided, the locations of the signage are not shown on any submitted plan.		24. Note – the proposed signage will be located on site on the entry points to the site.	24. Noted

		25. A number of local planning documents flag restricted water supply and potential shortages in the area, including Section 6.2 of the Point Henry Limited Rural Strategy 1991 and Section 6.16.2(c) of the Shire of Jerramungup Local Planning Strategy. The site has no reticulated water supply.		25. Note – there is no reticulated water available on the site.	25. Noted
		26. The Applicant's report acknowledges under Part 4.7 that 'a series of water issues were raised' and asserts that the development 'complies' with a sustainable water supply, but fails to identify what those issues were or explain how compliance is actually achieved.		26. Uphold – there is no indication as to water supply is resolved, the two attachments Appendix A Site & Soil Evaluation related to an earlier application for a difference proposal in 2023 and Appendix B is a sales document rather than identification of what will be done on site. Based on these documents the application cannot be supported.	26. Upheld - there is no indication as to water supply is resolved, the two attachments Appendix A Site & Soil Evaluation related to an earlier application for a difference proposal in 2023 and Appendix B is a sales document rather than identification of what will be done on site. Based on these documents the application cannot be supported.
		27. Potable water is stated to be supplied via roof capture, which is physically impossible from the eco-tents as they have no gutters and are located a significant distance from		27. Note – Potable water is to be supplied by water tanks, to be	27. Noted

		any hard-roofed structures. Water cartage is proposed to top up tanks when levels fall. This is not a sustainable water source. Given existing concerns about fresh water supply for the Bremer Bay townsite itself, regularly carting water to the site cannot be considered sustainable, and it will also increase the frequency and number of large service vehicles travelling to and from the Point.		pumped/gravity-fed rainwater, and topped up by carted water if required. Given that the eco-tents don't have gutters the water tanks for then will be required to be carted.	
		28. The water demand expected from 240+ persons on site at peak times will be considerable. Yet no detailed water use analysis covering occupancy numbers, daily consumption estimates or supply/rainfall modelling has been provided for the existing buildings, the proposed toilet block, the eco-tents or any other new structures. This is particularly concerning given that the main event season and maximum site occupancy will fall during the driest months of the year.		28. Note - the proposal is outlined as a wedding venue for up to 120 people including the 10 Eco tents. No detailed water usage per day has been provided with the application.	28. Noted
		29. For the development to have minimal environmental impact on adjacent waterways, including Salt Cove, the Applicant needs to demonstrate that there will be no discharge or run-off from the proposed effluent systems. The submitted documentation falls well short of this:		29. Noted – Aerobic Treatment Units (ATU) are proposed to be used for the Eco Tents	29. Noted
		30. Appendix A (Soil and Site Evaluation) has no relevance to this application. It relates to a previous application for an Ancillary Dwelling and Workers Accommodation on		30. Uphold – Appendix A 'Soil and Site Evaluation' is not	30. Upheld - Appendix A 'Soil and Site Evaluation' is not related to the current

		the site.		related to the current application and the proposed effluent disposal locations. /it relates to an earlier application and is not sufficient to recommend approval for the development.	application and the proposed effluent disposal locations. /it relates to an earlier application and is not sufficient to recommend approval for the development.
		31. Appendix B (Wastewater Report) is not a report or study at all. It is simply a quotation and product specifications, with no reference to specific locations, drain lengths or site conditions.		31. Uphold - Appendix B 'Wastewater Report' is not a report or detailed study based on the Applicant's proposal. It is simply a quotation and proposed product details and is not sufficient to recommend approval for the development	31. Upheld - Appendix A 'Soil and Site Evaluation' is not related to the current application and the proposed effluent disposal locations. /it relates to an earlier application and is not sufficient to recommend approval for the development
		32. While individual onsite wastewater treatment systems are proposed for each building/tent, the slope contour analysis in the Point Henry Limited Rural Strategy 1991 found that the area proposed for the eco-tents exceeds a 14% gradient, which was identified as too steep to consider for septic absorption and dwelling purposes.		32. Uphold – given the topography for the Eco – Tents on the eastern boundary runs between 20% and 40% there may be construction issues regarding access and effluent disposal.	32. Upheld - given the topography for the Eco – Tents on the eastern boundary runs between 20% and 40% there may be construction

					issues regarding access and effluent disposal.
		33. The masterplan shows overhead and underground power locations, but there is currently no mains power available at the proposed reception area (described as a 'portable' marquee) or at the eco-tents. The method of providing power to the new buildings and structures needs to be confirmed, along with the approach to emergency and wayfinding lighting. Each of the potential options carries its own risks		33. Uphold - there is a lack of detail as to how power will be distributed throughout the site. Based on the lack of detail the proposal cannot be supported.	33. Upheld - there is a lack of detail as to how power will be distributed throughout the site. Based on the lack of detail the proposal cannot be supported
		34. There is no detail on how vehicles, including deliveries and water cartage trucks, will access the site or where they will park in connection with the proposed Reception area. The inclusion of future development stages on the current application plan is confusing and makes it difficult to assess what roads and parking are actually being applied for at this stage.		34. Uphold – No traffic impact assessment has been provided with the application and as such there is insufficient information to determine the application. If the development was to be approved all references to future plans will be marked as 'Deleted from this Application'.	34. Upheld - there is a lack of detail as to how power will be distributed throughout the site. Based on the lack of detail the proposal cannot be supported If the development was to be approved all references to future plans will be marked as 'Deleted from this Application'.
		35. Noting that the applicant's own wedding		35. Uphold – up to 140	35. Upheld - up to 140

		packages cater for up to 140 guests, the provision of just 12 car bays is plainly insufficient. At 4 occupants per car, 12 bays provides on-site parking for only 48 guests. If remaining guests are expected to park on perimeter access roads or informally in the bush, this will directly impact neighbouring properties, emergency access and the natural vegetation.		guests are accommodated at each event (refer to the wedding packages offered on the Applicant's website), and only 40 car bays are proposed although only 12 are for weddings, 3 are ACROD, 5 for delivers 19 for accommodation units and 1 bus bay.	guests are accommodated at each event (refer to the wedding packages offered on the Applicant's website), and only 40 car bays are proposed although only 12 are for weddings, 3 are ACROD, 5 for delivers 19 for accommodation units and 1 bus bay.
		36. The report notes that 'with regard to liquor licencing, advice previously sought...confirmed that liquor licence is not required without the sale or supply of alcohol'. This may be technically accurate, but alcohol is and will be supplied as part of the proposed wedding/function use. The business's own website advertises 'cocktail weddings' and lists 4 bar staff as part of its packages. Exemptions for small functions only apply where alcohol is served to persons over 18, no earlier than 6am and no later than 10pm, and for a maximum of 2 continuous hours for up to 100 attendees, or 4 continuous hours for up to 75 attendees. The proposed wedding hours of 12 noon to		36. Uphold - Exemptions for small functions only apply where alcohol is served to persons over 18, no earlier than 6am and no later than 10pm, and for a maximum of 2 continuous hours for up to 100 attendees, or 4 continuous hours for up to 75 attendees. The proposed wedding hours of 12 noon to midnight make it virtually impossible for	36. Upheld - Exemptions for small functions only apply where alcohol is served to persons over 18, no earlier than 6am and no later than 10pm, and for a maximum of 2 continuous hours for up to 100 attendees, or 4 continuous hours for up to 75 attendees. The proposed wedding hours of 12

		midnight make it virtually impossible for these exemption conditions to be met. 37. This inconsistency needs to be resolved as part of the operational details. The risk to adjoining residents and to guest safety from regular alcohol service (at minimum once per week during the summer season) is a genuine and material concern. 38. Accessible parking bays are noted in the report, but the proposal does not identify which eco-tent will be configured for guests requiring level or ramped access, or specify internal layouts suitable for wheelchair users. At least one of the 10 proposed tents and the access path from the car bay to that tent must comply with AS 1428.1. The additional footprint required for an accessible tent will necessitate further vegetation clearing. The size and internal configuration of the accessible toilet in the proposed toilet block also does not comply with AS 1428.1. Further site works and clearing would be required to achieve a compliant building		these exemption conditions to be met and the appropriate liquor licence should be sought. 37. Uphold - as outlined under Officer Comment 29 to this submission the exemption used may be flawed and as such a liquor licence should be sought. 38. Uphold - Accessible parking bays are noted in the report, but the proposal does not identify which eco-tent will be configured for guests requiring level or ramped access, or specify internal layouts suitable for wheelchair users. At least one of the 10 proposed tents and the access path from the car bay to that	noon to midnight make it virtually impossible for these exemption conditions to be met and the appropriate liquor licence should be sought. 37. Upheld - as outlined under Officer Comment 29 to this submission the exemption used may be flawed and as such a liquor licence should be sought. 38. Upheld - - Accessible parking bays are noted in the report, but the proposal does not identify which eco-tent will be configured for guests requiring level or ramped access, or specify internal layouts suitable for wheelchair users. At least one of the 10 proposed tents and

		design.		tent must comply with AS 1428.1. The additional footprint required for an accessible tent will necessitate further vegetation clearing.	the access path from the car bay to that tent must comply with AS 1428.1. The additional footprint required for an accessible tent will necessitate further vegetation clearing.
		39. The Applicant states that the maximum number of occupants on site at any one time will be 120 guests (adults and children), including guests staying in the eco-tents. However, the business's own website advertises wedding packages for up to 140 guests, and there is no undertaking that the eco-tents would be reserved exclusively for event guests. We estimate that total site occupancy could reach up to 240 persons, which is well in excess of the 122 figure cited in the report.		39. Note– the report states a maximum occupancy of 120 guest but the webpage currently advertises packages for up to 140 guests. Whilst it is stated that the Eco tents are to be occupied by wedding guest there is no guarantee that these would be exclusively for event guests which would result in more being on site that stated in the report.	39. Noted
		40. The proposed perimeter access roads to the site directly impact the amenity of neighbouring properties by routing vehicles alongside adjoining lots, bringing with them additional noise, dust and light nuisance.		40. Uphold – having the road along the northern boundary will impact on adjacent dwelling through additional noise	40. Upheld - having the road along the northern boundary will impact on adjacent dwelling

				and dust impacts	through additional noise and dust impacts
		41. The vehicle access management plan has not been confirmed. While Horse Hill Road is described as the 'main entry', additional vehicle movements via Magpie Rise are inevitable, particularly for access to Short Beach.		41. Uphold - in the absence of a traffic impact assessment there is insufficient information to determine the application.	41. Upheld - - in the absence of a traffic impact assessment there is insufficient information to determine the application.
		42. No fencing or locked gates are permitted along the boundaries due to the fire risk of the peninsula. Guests unfamiliar with the site could inadvertently stray onto adjacent properties.		42. Uphold - under Local Planning Scheme No. 2 Cl 5.24.3 o) Boundary fences are not to be erected on lots with coverage of more than 80% natural vegetation which would mean the boundaries adjacent the 'rural residential' zoned land should not be fenced.	42. Upheld - under Local Planning Scheme No. 2 Cl 5.24.3 o) Boundary fences are not to be erected on lots with coverage of more than 80% natural vegetation which would mean the boundaries adjacent the 'rural residential' zoned land should not be fenced.
		43. It is also worth noting the sheer volume of traffic this proposal would generate. The current plan presented includes 16 eco-tents and 12 caravan sites, which means a minimum of 28 vehicles and realistically more when you factor in additional friends visiting, workers etc. Conservatively, that is		43. Uphold in part – 10 eco tents are proposed, no caravans and the wedding venue. Irrespective of this the absence of a traffic	43. Upheld in part – 10 eco tents are proposed, no caravans and the wedding venue.

		30 cars. If each of those vehicles enters and leaves the property just three times in a day (which is entirely normal for holiday makers: breakfast out, a coffee run, a trip to the beach, a visit to the shops, dinner at the pub), that is 180 car movements minimum per day. Whether those movements occur on Horse Hill Road or Magpie Rise, that is not an acceptable level of traffic for a rural residential locality. 44. Add an additional 12 caravan sites opposite the 12 caravan sites that are shown as future development on the plan (and which will, in our view, inevitably be the subject of a future application), and you are looking at 50 cars and 300 car movements per day. Then add additional future chalets in potential future development, and the numbers keep climbing. At some point this stops being rural tourism and becomes a commercial resort operation imposed on a quiet rural peninsula. 45. The proposed site, and Point Henry as a whole, are identified as high fire risk in numerous Shire planning policies and documents. While the applicant notes that the site is zoned 'Rural' and not 'Rural Residential', it sits in very close proximity to lots subject to Local Planning Policy LPP18 (Point Henry Fire Management Plans). 46. Intensifying the occupancy of the site with additional visitors and overnight		impact assessment there is insufficient information to determine the application. 44. Dismiss – No caravan bays are proposed as part of the development. Any future development will be deleted from this application if approved. Any future development will required a new application will need to be lodged. 45. Noted - ‘rural residential’ zoned land is to comply with LPP18 Point Henry Fire Management Plans 46. Uphold - overnight accommodation by	Irrespective of this the absence of a traffic impact assessment there is insufficient information to determine the application. 44. Dismissed 45. Noted 46. Upheld - overnight accommodation by additional visitors

		accommodation substantially increases the risk of fire events affecting both the site and the surrounding area, particularly where guests will be unfamiliar with the land, the layout and the evacuation procedures, and potentially dealing with a high-stress emergency scenario. 47. A very high level of scrutiny is therefore warranted, well above what LPP18 assumes for low-intensity residential development and very-low development on Rural lots. While a fire shelter has been proposed to reduce the risk to life on site, there is minimal detail about the conversion of the existing shed, which would require a very large cleared area, emergency power, communications and mechanical ventilation. Critically, fire shelters are to be treated as a measure of 'last resort' only. The absence of a Bushfire Emergency Plan and the absence of DFES and local brigade responses, as already noted above, leaves the management of this risk largely unaddressed.		additional visitors significantly raises the risk of potential fire-events occurring that impact the site and the surrounding area. 47. Uphold –The Shed which is being converted into a fire shelter would need to comply with the following: While closure and early evacuation are recommended in the first instance, the following conditions should be imposed on a development approval where on-site shelter in a building is proposed: a. The on-site shelter must be designed and constructed in accordance with the Building Code of Australia and the ABCB Design and	significantly raises the risk of potential fire-events occurring that impact the site and the surrounding area. 47. Uphold - The Shed which is being converted into a fire shelter would need to comply with the standards outlined under Submission 13 recommendation 32 d)

				Construction of Community Bushfire Refuges Handbook (2014). The design must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. b. Prior to occupation of the development, a final inspection of the on-site shelter must be undertaken by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia. The fire engineer should provide certification, to the satisfaction of the local government, that the works have been completed in accordance with the requirements of the BCA and the ABCB Design and Construction of Community Bushfire Refuges Handbook (2014). c. Prior to occupation of	

				the development, an on-site shelter maintenance plan must be prepared by a suitably qualified fire engineer with fire risk assessment expertise, accredited with Engineers Australia, and must include: details of maintenance requirements; and details of annual testing requirements for operational compliance.	
		48. The Bushfire Management Plan acknowledges that the eco-tents are not required to have individual APZ clearances because they are classified as indefensible assets (they are, in plain terms, allowed to burn). What it does not address is the increased risk of a fire event being started in the first place as a result of additional site occupancy by guests who may have no familiarity with fire risk in a rural setting.		48. Uphold – This has not been stipulated in the application. It also doesn't address the fact that a fire event could occur with people being unaware in the indefensible asset. Given the risk to life it is recommended that the application be refused.	48. Upheld - This has not been stipulated in the application. It also doesn't address the fact that a fire event could occur with people being unaware in the indefensible asset. Given the risk to life it is recommended that the application be refused.
		49. A recent incident known to the respondent involved a fire at Short Beach that was		49. Note	49. Noted

		started through neglect by short-stay guests. That occurred at a single dwelling that had an APZ. The risk of unintended and accidental fire incidents increases substantially with additional site occupancy: generators, lithium batteries, candles, cigarettes and other ignition sources all become more prevalent. 50. The planning report simply states that 'it is reasonably foreseeable that this application will comply with the Noise Regs and therefore an Acoustic Report has not been prepared'. Given the scale of the proposed operations, including at minimum one main event per week of up to 140 guests, one Wellness Event per week during summer, 4-5 deliveries per week (potentially including water tankers), and 10 eco-tents with guests arriving and departing at various times, this assertion is wholly inadequate. 51. Events are proposed to run until midnight,		50. Uphold – The development is required to comply with the Environmental Protection (Noise) Regulations 1997. The report states that an Acoustic Report has not been prepared. It is considered that this is a deficiency in the application given the usage of the site and that an Acoustic Report should have been prepared and as such the development should not be approved. 51. Note - see officer	50. Upheld - The development is required to comply with the Environmental Protection (Noise) Regulations 1997. The report states that an Acoustic Report has not been prepared. It is considered that this is a deficiency in the application given the usage of the site and that an Acoustic Report should have been prepared and as such the development should not be approved. 51. Noted

		at least once per week throughout the summer season. To demonstrate actual compliance with the Noise Regulations, an independent acoustic assessment should be a prerequisite for any consideration of this application.		comment 43.	
		52. The additional internal vehicle roads and pedestrian pathways proposed on the site will not be sealed. In a location known for strong winds, unsealed roads generate significant dust that will drift onto neighbouring properties.		52. Uphold – A dust management plan should have been prepared and lodged as part of the application and as such the development should not be approved.	52. Upheld - A dust management plan should have been prepared and lodged as part of the application and as such the development should not be approved.
		53. The site has already been operating as a wedding and functions venue for what appears to be up to 3 years, as evidenced by the applicant's Instagram account. This appears to be an unapproved intensive commercial use of a Rural-zoned property.		53. Uphold – It is noted that this activity has been ongoing for some time and this is the subject of ongoing compliance action.	53. Upheld - It is noted that this activity has been ongoing for some time and this is the subject of ongoing compliance action.
		54. The application states that an Ancillary Dwelling and Workers Accommodation (2 bedroom) were approved by the Shire in 2023/2024 but have not yet been built. These approvals already represent an intensification of use of a Rural lot. We assume they were subject to the relevant planning, environmental and safety considerations applicable to Additional Dwellings under Clause 5.25.4 of Local		54. Uphold - the application that an Ancillary Dwelling and Workers Accommodation (2 bedroom) have already been approved by the Shire on 24/04/2023 this application has lapsed	54. Upheld - the application that an Ancillary Dwelling and Workers Accommodation (2 bedroom) have already been approved by the

		Planning Scheme No. 2, which provides that the Shire 'MAY permit more than one dwelling to be erected and occupied on a lot where it is satisfied that an additional dwelling(s) is necessary or desirable for continuation of bona-fide rural activity, or for any other permitted use....the local government will have regard....to retain the rural character of the area.'		and a building permit was never issued. The approval was for an ancillary dwelling and worker accommodation (unlisted use) therefore outside of Clause 5.25.4 of Local Planning Scheme No. 2.	Shire on 24/04/2023 this application has lapsed and a building permit was never issued. The approval was for an ancillary dwelling and worker accommodation (unlisted use) therefore outside of Clause 5.25.4 of Local Planning Scheme No. 2.
		55. The same clause specifies that additional dwellings are to be occupied only by persons employed locally in rural uses. The proposed use of the dwellings (both existing and proposed), the lack of a suitable alternative water supply, and the sheer intensity of use being applied for in the current application are entirely at odds with this limitation.		55. Note – clause 5.24.4 did not apply in the approval that has now lapsed.	55. Noted
		56. The proposed Ancillary Dwelling and Workers Accommodation building locations also appear to have been moved to different positions on the site when compared to those shown in the submitted soil condition report. The Shire should consider whether a change of location of an approved building would require a new or amended planning application.		56. Note – the approval for the proposed ancillary dwelling and workers accommodation expired in April 2025 and as they were not substantially commenced a new	56. Noted

				application will be required.	
		57. The existing 170m2 dwelling and 216m2 shed are listed as 'existing' structures, with no further detail provided. The report notes they are identified as not approved and that they are 'exempt structures of a minor nature formally being claimed'. It also states: 'The property has recently been purchased by the Client, and it is suspected that some development is not reflected in documents from the City'. RP Data confirms the property was purchased in 2021. It appears no effort has been made to verify with the Shire whether these structures were ever approved, either by planning or building permit.		57. Uphold – the officer the existing 170m2 dwelling is unapproved and was renovated without any approvals being issued. The 216m2 shed is a Class 10 structure which is exempt under Schedule 4 of the Building Regulations 2012. It is noted that the 216m2 shed is proposed to be converted to a fire shelter. The requirement for a fire shelter are addressed under the officer comment on submission 13 point 32 d).	57. Upheld - the officer the existing 170m2 dwelling is unapproved and was renovated without any approvals being issued. The 216m2 shed is a Class 10 structure which is exempt under Schedule 4 of the Building Regulations 2012.
		58. Additional information about the existing structures should be required before they are formally designated as exempt. Bushfire compliance should not be taken as granted		58. Noted	58. Noted

		given their lack of APZ protection and the additional risk they pose to surrounding properties. 59. Even if the Shire accepts the existing shed as an exempt structure, it is now proposed to serve as the bushfire shelter for the entire site. That change of use will require planning approval (including APZ and bushfire compliance) and a Building Permit. The application should not be assessed without the fire shelter being formally included in the scope of the proposal, given the scale of vegetation clearing its APZ requires. 60. What is being proposed now, and what is planned for the future of this site, is not low-impact development. It is not retaining and protecting the existing natural environment. The 'future use' elements included on the current application plans make this abundantly clear, as does the following exchange from a published interview with the Owner (source: https://togetherjournal.com/salt-cove-bremer-bay/): 61. Asked how Salt Cove might evolve in the years ahead, the Owner responded: "With		59. Noted - The requirement for a fire shelter are addressed under the officer comment on submission 13 point 32 d). As the fire shelter is for a large crowd it would be classed as a 9b building and will need a building permit. 60. Uphold - any expansion of the uses on the site would be subject to another Development Application If the development was to be approved all references to future plans will be marked as 'Deleted from this Application'. 61. Uphold - all development on the site	59. Noted 60. Upheld - any expansion of the uses on the site would be subject to another Development Application If the development was to be approved all references to future plans will be marked as 'Deleted from this Application' 61. Upheld - all development on the

		100 acres on offer, I just see the site opportunities as endless. Every year, we are adding more on-site photo locations, meandering paths, and adding to the event lawn with tiers, stairs and planning platforms. There is an old house on site that we would love to rescue eventually and have as an option for bridal parties." 62. The proposed toilet block includes sufficient fixtures, as noted by the applicant, to service up to 250 patrons. This exceeds the stated maximum site capacity of 120 guests (or even 140 for weddings). Why are facilities for 250 patrons being installed now if the guest numbers are being capped at 120 or 140? 63. We call on the Shire to require the Applicant to remove all references to future plans for the site, including caravan sites, a central facilities/stage area and accommodation chalets, and to resubmit so that there is absolute clarity about what is actually being applied for. More importantly, we again formally call on the Shire to reject this application in its entirety.		will need to be in accordance with and building approvals. 62. Dismiss - the proposal has proposed a toilet block that could cater for 250 people. The required facilities for a number of people is a minimum standard and there are no restriction providing over and above the minimum level of ablutions. 63. Noted – request to reject the application in its entirety.	site will need to be in accordance with and building approvals. 62. Dismissed 63. Noted
18.	Paul Audin &	1. Our dwelling is one of those identified in Appendix D2 as being directly impacted, to	All) Same points as others, see my	1. Note – objection	1. Noted

	Christine Soulier	the same degree as other nearby properties already contacted by the Council. We therefore request that our objection be formally registered. 2. The Shire of Jerramungup Local Planning Scheme No. 2 designates the Point Henry area for “low-impact rural-residential retreats that minimise effects on the landscape and vegetation, while balancing fire management to ensure a safe environment”. 3. This proposal for intensive commercial-scale weddings and short-stay accommodation directly conflicts with that intent. It introduces higher-intensity land use, elevating risks in an already high bushfire-prone area, generating significant noise (as previously experienced over the last 3 years from events on the site and detailed in three unanswered letters to the Council), necessitating vegetation clearing, straining septic absorption systems, and disrupting the peaceful rural-residential amenity—while setting an undesirable precedent for future intensification. 4. We are particularly concerned that the master plan in Appendix D3 indicates potential evolution into higher-density accommodation (e.g., caravan park-style), which would be entirely inconsistent with the Scheme's low-impact vision, the Point Henry Limited Rural Strategy, bushfire	arguments elsewhere.	2. Dismiss - the site subject of the application is zoned ‘Rural’ and not ‘Rural Residential’ 3. Uphold – the intensification of the use of the site both by this application and any future application will be referred to adjoining landowners for comment. 4. Uphold - the development application only consists of the reception centre, 10 Glamping Tents, Fire Shelter and Toilet Block.	2. Dismissed 3. Upheld - the intensification of the use of the site both by this application and any future application will be referred to adjoining landowners for comment. 4. Upheld - the development application only consists of the reception centre, 10 Glamping Tents, Fire Shelter and Toilet

		planning requirements, and other related policies. We therefore recommend that the Shire prevent this proposal and any future higher-density residential or commercial uses on the site.		If the development was to be approved all references to future plans will be marked as 'Deleted from this Application'.	Block. If the development was to be approved all references to future plans will be marked as 'Deleted from this Application'.
		5. Additionally, the application provides insufficient or questionable information to adequately address critical matters, including: (i) protection and retention of remnant vegetation; (ii) limiting environmental conflicts arising from effluent disposal, water supply, and servicing capabilities; (iii) effective noise management; and (iv) minimising fire risks to guests and neighbours through a robust, high-standard Bushfire Management Plan (BMP).		5. Uphold – it is noted that Appendix A (Soil and Site Evaluation) has no relevance to this application. It relates to a previous application for an Ancillary Dwelling and Workers Accommodation on the site and Appendix B (Wastewater Report) is not a report or study at all. It is simply a quotation and product specifications, with no reference to specific locations, drain lengths or site conditions is inadequate to provide a basis for approval.	5. Upheld - it is noted that Appendix A (Soil and Site Evaluation) has no relevance to this application. It relates to a previous application for an Ancillary Dwelling and Workers Accommodation on the site and Appendix B (Wastewater Report) is not a report or study at all. It is simply a quotation and product specifications, with no reference to specific locations, drain lengths or site conditions is inadequate to provide

		6. We further note that 43 Horse Hill Road remains zoned Rural (low-intensity use), despite representations at the time of its last sale that rezoning to Rural-Residential would occur—this has not eventuated. Moreover, the site has apparently operated wedding functions and camping for up to three years without approval, suggesting the current commercial activities are already non-compliant and indicative of an approach outside the planning rules.		6. Noted - the current application contains a number of retrospective elements and there is ongoing compliance with the historic use of the site.	a basis for approval. 6. Noted
		7. A development of this scale would likely require multiple access points/egresses, which we consider unfeasible without substantial disruption to the rural-residential character and amenity of neighbouring properties. We therefore oppose any vehicle access via Magpie Rise or the creation of roads along the northern strategic firebreak. All traffic must remain strictly restricted to 43 Horse Hill Road.		7. Dismiss – two accesses to the site are required for ease of access to leave the site in case of emergency.	7. Dismissed
		8. Reject the proposal, as it fails to align with the Scheme's rural-residential intent and related policies (including the Point Henry Limited Rural Strategy and bushfire planning requirements).		8. Note – request to reject proposal.	8. Noted
		9. Extend the submission period and broaden consultation to encompass the wider Bremer Bay community.		9. Dismiss - The application was advertised for 3 weeks which is i9n excess of	9. Dismissed

		10. Restrict all traffic and access to 43 Horse Hill Road only (excluding Magpie Rise and the northern firebreak) to protect the character and amenity of neighbouring rural-residential areas.		the Scheme requirement of 2 weeks. 10. Dismiss – two accesses to the site are required for ease of access to leave the site in case of emergency.	10. Dismissed
19.	Peter & Michele Brown	1. As retired farmers, we enjoy the quiet and private property we have invested in, as our home. In the past the Baums have been running their business 'Salt Cove Bremer Bay - Destination wedding location in Bremer Bay, Western Australia', approved by the Shire of Jerramungup. We have no objection to this current business they are conducting.		1. Note – support on the basis that the wedding operation has been approved by the Shire which is not the case as this application includes this use for the first time.	1. Noted
		2. I did speak briefly with Brodie about their idea and the need to expand and provide luxury and alternative accommodation choices to complement their already established business. I identify with this aspiration as well as the opportunity of promoting a Yoga retreat/event facility, when weddings were not in the schedule, as outlined in the proposal 'Proposed Weddings & Short-Stay Accommodation Development Application Town Planning Report 2 February 2026' Planning Outcomes WA town planning, urban design, landscaping + appeals Tourism Council Western Australia, comprising of 34 pages.		2. Note – support of yoga/events when weddings not running.	2. Noted

		3. Considering the map that was provided, 'DA for Weddings & Accommodation – Appx.D3: Master Plan', while I see no reason to object to the construction of 10 Echo Tents, where they are situated on the property,		3. Note – no objection to tourist accommodation.	3. Noted
		4. Peter, however, has a strong objection to the 10 Echo Tents mainly on the grounds of extra people on the property and the increased fire risk associated with this kind of structure.		4. Note - objection to tourist accommodation mainly due to extra people on the property and the increase fire risk associated with this kind of structure.	4. Noted
		5. Along with this we understand the need to supply a reception venue however, no information has been supplied so we cannot comment on this. In saying that, for basic sanitation needs when large groups gather, we identify the need for the demountable ablution facility and hence do not object to this upgrade as noted on 'Page 4. DA for Weddings & Accommodation – Appx.D5: Toilet Block Plan Set'.		5. Note - supports the ablution block.	5. Noted
		6. We do however have great concern for the future development of the business as outlined on the map. '		6. Note - concern over the extend of development on the map.	6. Noted
		7. Twelve caravan bays and 3 possible future stages. We would not support the implementation of a caravan park-up facility or stages- presumably catering for events		7. Dismiss – this application does not propose any caravan bays.	7. Dismissed

		and the like (no clarification outlined; therefore, we cannot disregard music concerts). The logistics of running this type of business at Point Henry would need a far more extensive proposal with all the approved licences, management plans, and local and federal government policies that safeguard human life, dictate infrastructure requirements and standards e.g. building structures, waste, power, water, occupational safety and health and seek environmental approval etc. These proposals are usually advertised to the broad community for public comment.		If the development was to be approved all references to future plans will be marked as 'Deleted from this Application'	
		8. Extend road Magpie rise to Short Beach and emergency destinations**.** We have noted that on the map, 'there is a gate and extension to the road from 43 Horse Hill Road that leads onto Magpie Rise (a cul-de-sac or dead-end street with a rounded, circular end designed for vehicles to turn around) to allow for access with a notation arrow on the map, 'to Short Beach and emergency destinations'. We strongly object to any access from the property, 43 Horse Hill Road to Magpie Rise by any means; foot, bicycle, horse, motorcycle, vehicle or the like, unless, in an emergency evacuation procedure. The main gate and only gate should be the access point to the location as designated by Landgate, Western Australia.		8. Note - objects to the opening of Magpie Drive unless it is on emergency.	8. Noted
		9. The fire risk and open flame activities such		9. Note - the fire risk	9. Noted

		as bush fire's, campfires, fire pits, cooking on coals and open gas BBQ's, even during cooler weather after a dry summer. There is only one road that connects Point Henry and the surrounding locality to the townsite of Bremer Bay. An extensive evacuation and fire management plan would have to be professionally presented with all the appropriate government and volunteer emergency services approvals, conditions and guidelines. Many of the tourists that visit Bremer Bay are not familiar with the local fire risk or management procedures, nor do they have local knowledge of the terrain, should a dangerous/hazardous event of this nature occur. Furthermore, signage at the one and only main entrance leading off Horse Hill Road, should have clear bold information stating NO open flame. In our opinion cooking on the property should be within a closed facility e.g. a kitchen within a dwelling or within a closed stainless steel gas BBQ, as found in many parks around Australia. 10. Privacy**.** I have spoken to Brodie about our concern with people using the firebreak joining both of our properties, for their own recreational use. The Baums share our concern and would like this to be addressed along with all the property owners in the area. We continue to work with the Shire of Jerramungup on this issue with positive results. The fire breaks are on private land and are		and open flame activities such as bush fire's, campfires, fire pits, cooking on coals and open gas BBQ's, even during cooler weather after a dry summer. There is only one road that connects Point Henry and the surrounding locality to the townsite of Bremer Bay. An extensive evacuation and fire management plan would have to be professionally presented with all the appropriate government and volunteer emergency services approvals. 10. Note - not supportive of the pedestrian pathways shown on the map (Appendix D3).	10. Noted

		there for emergency access only. In stating this, we are not supportive of the pedestrian pathways on the map, 'DA for Weddings & Accommodation – Appx.D3: Master Plan', that lead onto the fire breaks. It is the nature of humans to become curious and explore. Visitors to the area may not realise these pathways lead onto the neighbouring properties. I would much rather the pathways loop internally around the property or alternatively lead onto Crown land that borders between the property and the coastline at Point Gordon.			
		11. Increased traffic and visitors staying for extended periods of time. Hose Hill Road is a gravel road. The dust and noise would be of great concern regarding the increased flow of traffic coming and going from the property over a 24-hour period. Horse Hill Road would have to be bituminised and curfew opening and closing hours of the business, would have to be applied to respect the … 'ambience of the neighbouring property owners' as stated in the Shire of Jerramungup Town Planning Scheme 2 -That an objective of the Rural-Residential zone at Point Henry is to …'Facilitate the creation of quality rural-residential retreats in a scenic area.' 'A retreat is a quiet, isolated place that you go to in order to rest or to do things in private'. Collins Online Dictionary. This is the common definition of the word 'retreat', and I presume the intention of the Shire of		11. Uphold – A dust management plan should have been prepared and lodged as part of the application and as such the development should not be approved.	11. Upheld - A dust management plan should have been prepared and lodged as part of the application and as such the development should not be approved.

		Jerramungup's Town Planning Scheme 2, regarding Point Henry Rural-Residential zoning.			
		12. Precedent**.** Considering there are other rural-residential properties within the Point Henry locality, we are concerned that they too could apply for commercial ventures of a similar nature, which would then be detrimental to the philosophy intended for those residing at Point Henry, and place more stress on an already fragile environment and rural town, with limited capacity to maintain basic service demands.		12. Dismiss - the subject lot is zoned 'rural' not 'rural residential' so no precedent is created for 'rural residential' zoned land.	12. Dismissed
		13. Local amenities and services. The increased demands on volunteer emergency services, health and welfare needs, domestic infrastructure e.g. water, electricity, waste and roads etc. in a rural town with a limited capacity to manage the increased visitor population, over many months of the year, is of paramount importance. It is how our local government establishes local laws and policy and manages progress that needs to be well researched, professionally considered, well outlined and scrutinised by local government staff, the local community and the broader public.		13. Note - The increased demands on volunteer emergency services, health and welfare needs, domestic infrastructure e.g. water, electricity, waste and roads etc. in a rural town with a limited capacity to manage the increased visitor population, over many months of the year, is of paramount importance.	13. Noted
		14. Environmental impact. With the weather patterns changing, the pristine coastal and inland areas are becoming increasingly vulnerable. It is a known fact that species of		14. Note - environmental impact with changing weather patterns and flora and	14. Noted

		fauna and flora are steadily becoming threaten within our region. And after the recent fires in the Fitgerald and broader surrounds in the Southeast/west and Great Southern, habitats have been destroyed and this is becoming more frequent and evident. Again, with an increase in the demographic to accommodate large 'tourism based' proposals, the environmental aspects must meet state and federal legislation and undergo an extensive consultation and education period, before any commercial operation is approved by the appropriate agencies, all those possibly impacted and the community.		fauna are become threatened in this region. A fauna and vegetation study was not provided and the comment in Part 2.3 stating that no wildlife has been observed on site other than transitory birds demonstrates that the fauna on the site has not been adequately surveyed. The lack of details does not make the development supportable.	
		15. Insurance liability. We are concerned with the potential increase in the premiums of personal house and contents and public liability insurance cover to the owners who boundary commercial venues and whose property is utilised as an emergency access only along a shared fire break. Point Henry and Point Gordon Peninsular is now a known fire hazard. Therefore, any commercial venture allowing multiple people to stay overnight on Point Henry and Point Gordon Peninsular will no doubt drive up insurance underwriting. This concerns us and it will no doubt be on the mind of every property owner and business owner just how must cost will be involved in taking out		15. Note - concern over insurance costs with increasing development.	15. Noted

		insurance for the obvious reasons stated in our comments in this proposal.			
		16. In conclusion**.** We support the current Shire of Jerramungup approved business 'Salt Cove Bremer Bay - Destination wedding location in Bremer Bay, Western Australia', at 43 Horse Hill Road, Bremer Bay WA.		16. Note – supporting of the reception centre on the basis it was already approved (which it was not).	16. Noted
		17. We identify the need for the demountable ablution facility and hence do not object to this upgrade as noted on 'Page 4. DA for Weddings & Accommodation – Appx.D5: Toilet Block Plan Set'.		17. Note – identified the need for the demountable ablution facility and does not object.	17. Noted
		18. We do not support any further noted proposals on map.		18. Note – does not support the future development.	18. Noted
		19. I, Michele, support the construction and management of 10 Echo Tents to compliment the already existing business if, there is an absolute majority vote cast, in favour, by the current council of the Shire of Jerramungup regarding the Town Planers report and recommendation on the, 'Proposed Reception Centre & 10 Tourist Accommodation (Eco Tents) At 43 Horse Hill Road Bremer Bay WA 6338', at the scheduled council meeting of the Shire of Jerramungup.		19. Note – supports the tourist accommodation if there is an absolute majority decision in favour.	19. Noted

20.	Ian Weir	1. As I understand it, only the immediate neighbours of this proposal have been contacted by the Shire of Jerramungup for comment. The problem here is obvious: complaining neighbours are often perceived by council and administrative tribunals as NIMBYs - not in my backyard types – “those types don’t want any form of development next door”. 2. A development such as this, that will have commercial impact on other businesses in the locality should be broadcast more widely. 3. A development such as this that will have an impact on community bushfire safety should be broadcast more widely. 4. Name of the Application ‘Wedding Venue’ is misleading. After correspondence with the shire planner I have learnt that this development application is actually for 10 so-called ‘eco tents’, a prefab toilet block, a bushfire shelter, pergola and workers accommodation. This does not constitute a typical wedding venue - to name it as such is a misrepresentation and will lead people to believe this proposal is for something that is well mannered and that is fulfilling a need in Bremer Bay. 5. Regarding those items on the site plan that are labelled ‘future building or use’ - the Council needs to advise the applicant	All) Same points as others, see my arguments elsewhere.	1. Note - the proposal was advertised in accordance with the Scheme. 2. Note - the proposal was advertised in accordance with the Scheme. 3. Note - the proposal was advertised in accordance with the Scheme. 4. Dismiss - the application was refed to as Reception Centre and 10 Tourist Accommodation (Eco Tents) all the other development is incidental to those 2 land uses. 5. Uphold – if the development was to be approved all references	1. Noted 2. Noted 3. Noted 4. Dismissed 5. Upheld - if the development was to be approved all

		that either: None of those 'future' elements can be assessed - and therefore they need to lodge a new site plan and application to be presented to neighbours and the community for a better informed comment. Or; That the proponent prepare a different application seeking 'Approval in Principle' for the future elements of development. 6. Due to the lack of clarity here, If council approves this application based on the presented information then the proponent could misunderstand this as being a formal 'in-principle approval' for all those 'future' items depicted on the site plan. 7. Not only does the application include 'future' elements, the legibility of the graphics on the site plan is very poor and therefore misleading		to future plans will be marked as 'Deleted from this Application'. Any expansion of the uses on the site would be subject to another Development Application. 6. Note - if the development was to be approved all references to future plans will be marked as 'Deleted from this Application'. 7. Uphold – confusion over which stages are 'future development' It is very unclear which roads and parking areas are to be included in the current application to be able to assess the proposal, and the number of parking spaces listed in the Planning Report do not correspond to the Masterplan provided.	references to future plans will be marked as 'Deleted from this Application'. Any expansion of the uses on the site would be subject to another Development Application. 6. Noted 7. Upheld – confusion over which stages are 'future development' It is very unclear which roads and parking areas are to be included in the current application to be able to assess the proposal, and the number of parking spaces listed in the Planning Report do not correspond to the Masterplan provided.

		8. All this uncertainty increases the ambiguity on the illegibility of the entire application - to the point that this administrative process is quite dysfunctional. 9. The application must be sent back to the proponents for revision. If council instead approves the application with written conditions, then that will be a miscarriage of the planning process because those conditions will need to be of such magnitude that they could not reasonably be envisaged by those currently making comment upon the Council-supplied information and within the advertising period. 10. There are no plans or elevations included for the on-site bushfire shelter (this application - not a future use) – the Bushfire Management Plan makes reference to an existing shed but this respondent does not believe that this is anywhere near large enough to accommodate all the guests and staff in a bushfire emergency. 11. The site plan is misleading as it depicts the bushfire shelter as a small structure. Visualise here instead - what one would expect for a fit-for-purpose bushfire shelter for 100-200 people - a medium sized agricultural machinery shed - or say 3-4 times the area of the proposed toilet block.		8. Note – there was sufficient information within the application to make a determination. 9. Note - the application will not be approved for a range of reason outlined within this Schedule of Submissions. 10. Note – refer to submission 13 officer comments 32. d). This will be a Class 10c building 11. Note - the Shed in question has an area of 216m2 which is sufficient for the numbers proposed on the site.	8. Noted 9. Noted 10. Noted 11. Noted

		12. Under state planning policy 3.7, on-site bushfire refuges must be engineered by a specialist fire engineer – so this casts doubt on whether an existing shed (regardless of size) could be made fit-for-purpose as a bushfire shelter. 13. The on-site bushfire shelter is mandatory (under SPP3.7) for such developments where the accommodation might be destroyed in a bushfire - which is the case here with the proposed eco tents. The vulnerable use here is the accommodation of the tents - not the two houses (which must have BAL-29 APZ's) and yet the bushfire shelter is located many 100's of metres from the tents. Some tents being almost half a kilometre from the fire shelter 14. This plan also confirms that all eco tents are to be in unmanaged BAL-FZ sites – that is, the most dangerous sites in which to live and camp**.** 15. When we consider this so-called Bushfire Management Plan in the following context: a) Many guests – at a venue of this nature - would be toddlers, or elderly or inebriated.		12. Note – refer to submission 13 officer comments 32. d). 13. Uphold - the bushfire shelter is placed to service the reception centre but not the Tourist Accommodation. Due to the remoteness of the eco-tents from the bushfire shelter it is recommended that the tourist accommodation is refused. 14. Uphold - due to the remoteness of the eco-tents from the bushfire shelter it is recommended that the tourist accommodation is refused. 15. Upheld - the Bushfire Management Plan has several deficiencies as outlined in the comment. Based on this it is considered an unacceptable risk to	12. Noted 13. Upheld - the bushfire shelter is placed to service the reception centre but not the Tourist Accommodation. Due to the remoteness of the eco-tents from the bushfire shelter it is recommended that the tourist accommodation is refused. 14. Upheld - due to the remoteness of the eco-tents from the bushfire shelter it is recommended that the tourist accommodation is refused. 15. Upheld - the Bushfire Management Plan has several deficiencies as outlined in the comment. Based on this it is considered an

		b) They have the traverse steep rocky and thickly vegetated terrain going uphill to get to the shelter; c) Significant wildfires on Point Henry have been caused by lightning strikes, then winds driving the fires east (not west) - regardless fire can come from any direction including the eco tents themselves; d) Camping (which is what this is) in bushland areas presents its own risks regarding unauthorised and poorly managed campfires. In this context, the utility of the Bushfire Management Plan is highly questionable – it does not even pass the 'pub test'. 16. People of all ages and physical capabilities will be attracted to this accommodation - especially if this caters for weddings. The type of use here is quite unlike that where similar vulnerable use ecotourism facilities have been developed in bushland areas, that is: guests here are not fit, adult bushwalkers trekking overland, but rather, are more likely to include the inebriated, the elderly, and young toddlers. 17. Therefore, as a first principle, there needs to be much closer co-location between the		approved the development. 16. Noted - given that the eco-tents will be run in association with the reception centre there is a risk that those in the accommodation may unfamiliar with the environment. 17. Upheld - the eco-tents if approved need to	unacceptable risk to approved the development. 16. Noted 17. Upheld - the eco-tents if approved need to be

		tents and the shelter and possibly a number of shelters.		be located in close proximity to the bushfire shelter.	located in close proximity to the bushfire shelter.
		18. The State-mandated asset protection zones around the shelter, the tents and other habitable structures are not shown on the site plan. One has to be familiar with reading Bushfire Management Plans to make a judgement on how much environmental impact such a development will have. Council therefore needs to delay decisions on the proposal until comprehensive and consistent information is presented to the community for comment.		18. Note – the mandated protection zone will be the maximum as the outbuilding being used was not built in accordance with AS 3959.	18. Noted
		19. It is acknowledged that under the TPS it might be possible for the landowner to subdivide this property to produce say 10 lots at 4 ha each (10 acres) as per the pattern of rural residential development across Point Henry. Ultimately that could realise 10 homes with another 10 ancillary accommodations. Thereby the 100-acre property might accommodate similar numbers of people and car movements to the current proposal (if we include the 'future uses'). However, such a development would have to satisfy mandatory requirements of SPP3.7 Planning for Bushfire Protection and each home would have to have 10,000 litres of standing water, formed roads with fire breaks and so on. So, with a rural		19. Dismiss – the subject lot is zoned 'Rural' and there is no potential for subdivision for this under the Scheme or WAPC Policy.	19. Dismissed

		residential pattern of development there would be 100,000 litres of water dedicated to fire fighting. 20. Each ecotent – as shown on the plans - has a toilet, shower and wash area. So each will generate waste water of a volume comparable to a typical small house. This effluent needs to be treated on site, and as the application documents show ("Wastewater ATU .pdf"), they will require significant earthworks, but these disposal areas are not shown on the plans 21. This application should be rejected in its entirely – without conditions. This whole process reads like the applicant could not be bothered consulting the shire and fire authorities in advance and so they just cobbled together some docs and lodged the application to draw out objections. After all such land uses are not even permitted in the Shire's own Town Planning Scheme. 22. Do what everyone else does – commission a credible designer, consult with all the relevant parties and put a considered application together from the get-go.		20. Noted - the disposal areas for each of the ATU have not been shown on the plan and will cause a large degree if clearing. 21. Noted – recommend that the application is refused 22. Noted	20. Noted 21. Noted 22. Noted

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