Attachment 11.7.4

J and J Doggett

PO Box 205

Nannup 6275

WA

4 Blackwood River Drive

Nannup

Dear Erin,

With reference to your correspondence (your ref- A32) regarding the Development Application of Lot 4027 (354 & 370) Barrabup Rd Nannup . Property known as The Loose Goose owned by Kieran and Lyn Curtis.

We have no objections to the proposed development.

Signed John Doggett Date 31/March / 2025

Signed Josephine Doggett Date 31 / March / 2025

SHIRE OF NANNUP
RECEIVED
Ref: No:
31 MAR 2025
Officer:

GOVERNMENT OF WESTERN AUSTRALIA

Department of **Biodiversity, Conservation and Attractions**

PARKS AND WILDLIFE SERVICE

Your ref: A32
Our ref: 53760 2023-003140
Enquiries: Cherie Kemp
Phone: 08 9725 4300
Email: swlanduseplanning@dbca.wa.gov.au

SHIRE OF NANNUP
RECEIVED
Ref: A32 No:
24 APR 2025
Officer: DS

Executive Officer
Shire of Nannup
PO Box 11
Nannup WA 6275

Attention: Erin Gower

DEVELOPMENT APPLICATION – LOT 4207 (354 & 370) BARRABUP ROAD, NANNUP PROPOSED CAMPING GROUND, CARAVAN PARK, ABLUTIONS BLOCK, CAMP KITCHEN, CAFÉ & RURAL PRODUCE STORE

I refer to your letter dated 24 March 2025 seeking the Department of Biodiversity, Conservation and Attractions' (DBCA) comments in relation to a development application for the above property.

The following recommendations and comments are provided pursuant to DBCA's responsibilities under the *Conservation and Land Management Act 1984* (CALM Act) and the *Biodiversity Conservation Act 2016 (BC Act)*.

It is noted that Barrabup Road, Gracillis Road and Mowen Road are identified as an emergency exit route as part of the Bushfire Emergency Plan. Gracilis Road is ungazetted and lies wholly within the Jarrahwood State Forest which is managed by DBCA. DBCA SW is supportive, in principle, of the Shire managing and maintaining Gracilis Road, subject to CALM Act licence and ultimate excision from State Forest. The proponents of the proposed development and the Shire of Nannup should continue to liaise with the Blackwood District of DBCA regarding this exit route.

The proposed development should not impact upon the adjoining State forest areas. The proponent is to liaise with the Blackwood District of DBCA regarding access to Lot 103 through the State forest. No clearing or widening of the existing access should occur without prior consultation with DBCA.

The introduction of weeds, feral animals (containment of cats, dogs, horses and other stock by suitable boundary fencing), dieback hygiene and management and more frequent fires are issues that may impact upon the adjoining State Forest and are to be considered as part of this development.

This proposal indicates development will be contained within existing cleared areas to avoid further clearing within the lot, although clearing for bushfire management is likely to occur for access and asset protection. It is recommended that no further clearing occur for asset protection, placing camping sites within suitable setbacks outlined in the Bushfire Management Plan (Bushfire Prone Planning, 10th January 2025).

The proposed development application area contains some remnant vegetation which is habitat for endangered and vulnerable black cockatoos, listed as threatened fauna.

The following advice note is recommended.

Advice Note
Vegetation within the proposed development area provides habitat for endangered and vulnerable listed black cockatoos, which are listed as a threatened species under the *Biodiversity Conservation Act 2016* (BC Act).

Immediately prior to vegetation clearing occurring, pre-clearance checks should be undertaken to determine the presence of threatened fauna that may be adversely impacted by these works. Checks should include looking for black cockatoos and their hollows in vegetation to be cleared.

If found to be present, threatened fauna should be encouraged to disperse into the surrounding vegetation prior to any works commencing. Upon commencement, any vegetation clearing should be undertaken in such a manner that allows the dispersal of threatened fauna. If fauna does not disperse, a fauna spotter holding authorisation may need to be contacted to manage displaced threatened fauna.

The taking (including capturing or killing) of threatened fauna is regulated under the BC Act. For further information regarding responsibilities relate to threatened fauna please email speciesandcommunities@dbca.wa.gov.au

Thank you for the opportunity to comment on this proposal. Please contact Cherie Kemp at the Parks and Wildlife South West Region office on 9725 4300 if you have any queries regarding this advice.

Yours sincerely

Kerstin Stender
A/ Regional Manager

24 April 2025

Jane Buckland

From: Lucy Harman
Sent: Saturday, 26 April 2025 11:06 AM
To: Shire of Nannup
Subject: [External] Support for Development Application - Lot 4027, Barrabup Road Nannup

Follow Up Flag: Follow up
Flag Status: Flagged

To whom it may concern,

I am writing in response to the development application for **Loose Goose - Lot 4027 (354 & 370 Barrabup Road, Nannup)**, which includes plans for a camping ground, caravan park, ablutions block, camp kitchen, café, and rural produce store.

Firstly, we would like to express our full support for the **Loose Goose Chalets initiative**. This development has great potential to increase accommodation capacity for local events while contributing to economic growth and community engagement in our region.

However, we have some questions and suggestions that we believe are important for ensuring the long-term sustainability and safety of this project:

1. **Sustainability Plans**
    - Could you please share details about the water conservation strategy? For example, are there measures in place to collect and utilize rainwater?
    - Do you have an estimate of the annual water usage for the development?
    - What are the plans for waste management and sewage? While we note that bins will be available and taken to the waste facility, will environmentally sustainable practices also be implemented?
2. **Traffic, Trails, and Wildlife Preservation**
    - Given the potential for increased traffic along Barrabup Road, have you considered creating new or improving existing bushwalking trails into town? This could encourage pedestrian and bicycle access while reducing vehicle use to and from the campsite.
    - With Barrabup Road being a known crossing point for local wildlife, such as emus and kangaroos, will the council implement measures to minimize fatal injuries to these animals? For example, are there plans for wildlife crossings, speed controls (e.g., speed bumps), or signage to raise driver awareness?

We greatly appreciate your consideration of these points, as they are vital to ensuring the development aligns with the Shire of Nannup's Strategic Community Plan 2012–2036, as well as the Shire's vision: *"To foster a community that acknowledges its heritage, values, and lifestyles whilst encouraging sustainable development."*

We look forward to hearing how these aspects will be addressed and would like to thank Kieran and Lyn Curtis in advance for the positive contribution they are making to our community through this initiative.

Kind regards,

Lucy Harman & Dominic Coulter 21 Sheoak Place Nannup, WA 6275

Erin Gower

SHIRE OF NANNUP RECEIVED
Ref: A32 No:
05 MAY 2025
Officer: DS

From: David Taylor
Sent: Friday, 2 May 2025 2:05 PM
To: Brad and Sally Black Hepburn
Cc: Kim Dolzadelli; Jane Buckland; Erin Gower
Subject: RE: [External] Development application Lot 4027 Barrabup Rd Nannup

Thanks Sally and Brad – I have passed this submission onto the Development Services Team for inclusion with other submissions

Kind Regards,

David Taylor
Chief Executive Officer

Shire of Nannup
rest • connect • grow

EXPERIENCE NANNUP

+61 8 9756 1018
PO Box 11 / 15 Adam Street Nannup W
nannup@nannup.wa.gov.au
www.nannup.wa.gov.au

From: Brad and Sally Black Hepburn
Sent: Friday, 2 May 2025 1:02 PM
To: David Taylor
Subject: Re: [External] Development application Lot 4027 Barrabup Rd Nannup

To whom it may concern:

With regard to the Development application for Lot 4027 Barrabup Road Nannup, we have several concerns that many of the North Nannup residents will be adversely affected by the loss of the area's peaceful amenity, one which attracts residents to the area.

Our concerns are as follows-

Barrabup Road is a narrow, winding road which currently presents safety issues for pedestrians, cyclists and wildlife. A significant increase in traffic on this road is undesirable. Assumedly, there will be trade vehicles, service vehicles and trucks involved in developing and maintaining Lot 4027 as a camping ground and when it is open, a large number of recreational vehicles will almost certainly result in an increase in wildlife casualties, which is distressing for the permanent residents of North Nannup.

The proposed development is in a bushfire zone. In the event of a bushfire incident in the area, it is already a concern that residents only have only Barrabup Road as an exit from North Nannup. Having to evacuate large numbers of people out of the area in a hurry would be very problematic, especially if a number of caravans were included. Additionally, in the event of a fire emergency, the proposed caravan park may require inordinate amounts of limited fire fighting resources, thereby disadvantaging residential properties in North Nannup. An increasingly hotter climate will add further risk and complications as climate change progresses.

The applicants are hoping to have the cafe hours to be open 7am to midnight , 7 days a week. This could also increase traffic numbers on Barrabup Road and possibly drink driving situations.

The proposed exit road from the camping area seems as though it will significantly impact the flora and fauna at that site. The area is a wetlands in winter and a breeding ground for ducks and long-necked turtles. There are also some very old growth paperbark trees growing there and these need to be protected from the development of an access road and the compaction that will occur. The nutrients from ablution block septics may also have a detrimental effect on flora if sites aren't chosen with tree health an important consideration .

The bushland adjacent to Lot 4027, that extends to the river, is possibly going to attract tourists on foot and in vehicles. The area is a 'clean on entry', dieback free zone and will be put at risk by increased traffic. Dogs off leash will adversely affect the wildlife in the area. An possible increase in the number of patrons with off road motorbikes would also be an unwelcome change to the area.

Finally, we are concerned with the expansion potential of the proposed development should the adjoining property be put up for sale, noting the proximity of the park site to the neighbour's fence line.

All things considered, we find it difficult to support a proposed development that has the potential to reduce the appeal of the North Nannup locality for permanent residents.

Yours sincerely,
Sally Hepburn and Brad Black
104 Blackwood River Drive, Nannup

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SHIRE OF NANNUP
RECEIVED
Ref: A32 No:
06 MAY 2025
Officer: DS.

DFES
Department of Fire & Emergency Services

Our Ref: D38621
Your Ref: A32

Erin Gower
Shire of Nannup
Erin.gower@nannup.wa.gov.au

Dear Ms Gower

RE: VULNERABLE LAND USE - LOT 4027 (370) BARRABUP ROAD, NANNUP – PROPOSED CAMPING GROUND AND ADDITIONS TO FUNCTION CENTRE - DEVELOPMENT APPLICATION

I refer to your email dated 24 March 2025 regarding the submission of a Bushfire Management Plan (BMP) (Version 1.0), prepared by Bushfire Prone Planning and dated 10 January 2025, for the above development application.

This advice relates to the *State Planning Policy 3.7 Bushfire* (SPP 3.7) and associated *Planning for Bushfire Guidelines* (Guidelines).

It is the responsibility of the proponent to ensure the proposal complies with relevant planning and building requirements. This advice does not exempt the applicant/proponent from obtaining approvals that apply to the proposal including planning, building, health or any other approvals required by a relevant authority under written laws.

Assessment

- DFES acknowledges that the site currently operates as a function centre and short stay accommodation facility and that the development application seeks to expand accommodation options with the addition of a caravan park and to expand of the function centre to include café operations and a farm produce store.
- The decision maker has confirmed this proposal to be an intensification of development and the application of SPP 3.7 is triggered.
- DFES has not assessed the function centre as it has not been addressed within the BMP. SPP 3.7 and the guidelines should be applied if the application will:
    - Result in the intensification of development (or land use); or
    - Result in an increase of visitors, residents or employees; or
    - Adversely impact or increase the bushfire risk to the subject or surrounding site(s).
- Further clarification is required within the BMP of the requirements of SPP 3.7, and the supporting Guidelines as outlined in our assessment below.

1. Policy Measure 7.1 ii. c. BAL contour map

Issue	Assessment	Action
Vegetation Classification	Vegetation Area 3 cannot be substantiated as Class D Scrub with the limited evidence and photographic evidence provided. Foliage cover appears to exceed	Modification to the BMP is required.

	30%, and height sticks have not been provided to validate the overall height of the vegetation. Additionally, Area 3 appears to be a continuation of the Class A Forest vegetation within Plot 2 to the south. The BMP should detail specifically how the Class D Scrub classification was derived as opposed to Class A Forest. If unsubstantiated, the vegetation classification should be revised to consider the vegetation as per AS3959, or the resultant BAL ratings may be inaccurate.	
Vegetation Classification	There are portions of vegetation within Area 5 that appear to be a continuation of Area 1 and Area 2. The foliage cover appears to exceed 30%. The BMP should detail specifically how the Class G Grassland classification was derived as opposed to class A Forest. If unsubstantiated, the vegetation classification should be revised to consider the vegetation as per AS3959, or the resultant BAL ratings may be inaccurate.	Modification to the BMP is required.
Vegetation Classification	The post development vegetation classification of Area 2 as Class B Woodland cannot be validated. As per AS3959:2018: "The presence of disturbance by bushfire or past use does not itself warrant any reduction in the classification of the vegetation. The potential for re-vegetation should be considered."	Modification to the BMP is required.

2. Policy Intent

Assessment	Action
DFES acknowledges that the new Guidelines do not require the assessment of Location for development applications. However, the requirements for compliance with Siting and Design, in isolation does not allow for consideration of the overall location of the site and the broader landscape. Consideration should be given to the site context and the serious threat of bushfire to people, property and infrastructure at this location. It is considered that the likelihood of a bushfire, its severity and intensity, and the potential impact on life and property posed by the bushfire hazard at this location represents an extreme bushfire risk that cannot be managed/mitigated to an acceptable level. This location does not enable the extreme bushfire risk to be managed/mitigated to an acceptable level based on a range of factors including, but not limited to:	Decision maker to be satisfied.

• Evacuation from the site, with its singular access route, may not be possible and if attempted could pose an unacceptable risk to human safety. • Due to the extreme bushfire prone vegetation on multiple aspects, catastrophic bushfire behaviour is likely, and a bushfire could develop rapidly and grow to a significant size, that presents an unacceptable risk to the preservation of life, property and infrastructure.	

3. **Policy Measure 7.1 ii. e. Compliance with the Bushfire Protection Criteria 8: Development – Vulnerable tourism land uses and day uses**

Element	Assessment	Action
Siting and Design	**A2.1a - not demonstrated** The BAL ratings cannot be validated for the reason(s) outlined in the above table. Additionally, DFES does not accept the statement in the BMP that the caravan and camping area can achieve BAL-29. The BAL contour map (Figure 3.2) shows that parts of the proposed camping and caravan area are subject to BAL-FZ, as the BAL is based on the highest BAL applicable to the building or development.	Modification to the BMP is required.
	A2.3 – not demonstrated The BMP proposes a significant amount of vegetation that will need to be cleared and managed in perpetuity. It is for the decision maker to determine if the development avoids, or where unavoidable minimises the clearing of native vegetation.	Decision maker to be satisfied.
	A2.4 – not demonstrated It is DFES' opinion that the landscape management plan is insufficient. The BMP has identified that a significant amount of Class A Forest will need to be modified to achieve an APZ compliant with Schedule 1: Standards for Asset Protection Zones contained in the Guidelines. The Landscape Management Plan should be prepared to remove ambiguity for the landowner and to provide a compliance mechanism for the Shire.	Modification to the BMP is required.
Vehicular Access	**A3.2a – does not comply** DFES does not accept the statement in the BMP that compliance with the acceptable solution has been met. For the BMP to achieve compliance with A 3.2a it is reliant on the upgrade of Gracillis Road. No evidence has been provided to ensure that the upgrade will occur prior to the caravan / camping area becoming operational. Additionally, the BMP has noted that the site does not have two access routes to two suitable destinations currently available.	Does not comply.

	A3.3a and A3.3b – does not comply DFES notes that the length of the no-through road is greater than 200 metres and is not within BAL-LOW or within a residential built out area. Additionally, it has not been demonstrated that the no-through road has a turn-around area as per Figure 30.	Does not comply.
	A3.5 – not demonstrated The BMP has not clearly stated whether an outcomes-based approach is being applied. Where A3.2, A3.3a and A3.4 (if required), cannot be achieved and more than 100 guests and employees are proposed, and/or the bushfire planning practitioner considers an on-site shelter not necessary, an outcomes-based approach can be prepared. Section 5.4.1 of the BMP references a Performance Based Assessment. Additionally, there are references to Guidelines for Planning in Bushfire Prone Areas v1.4 which are no longer relevant and should be removed from the BMP. The BMP uses a Qualitative assessment titled *'A Qualitative Assessment of the Performance of the 'Acceptable Solutions: of Element 3 in ensuring vehicular access/ egress route availability and safe use in a bushfire event'.* The assessment provided does not align with the Guidelines or provide any contingency measure to mitigate the risk, instead it attempts to justify the non-compliance. The use of the table colours of risk level (table 2) compared to residual risk (table 3) appears misleading. If a risk is identified as 'Very High' and coloured red in assessment Table 2 and the risk level remains 'equivalent' in the performance assessment in Table 3, the colour should remain red. Instead, the colour changes to a yellow which gives the opinion of a lower residual risk. As per Policy Measure 7.5, where an outcomes-based approach is used, an assessment is to be undertaken in accordance with the policy, and the following criteria: a) Address the acceptable solution to the greatest extent possible; b) Identify the non-compliance with the acceptable solutions and why these cannot be achieved; 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; d) Detail if there are any community net-benefits, such as improvements to the public road network; e) Include any fire engineering solutions or written evidence such as publications and State Administrative Tribunal decisions to support the proposal (where applicable);	Modification to the BMP is required.

	f) Outline how the policy outcomes have been achieved; and g) Outline why approval is warranted by the decision-maker in this instance. The decision maker is to be satisfied that an outcomes-based approach demonstrates the outcomes of this policy are achieved.	
Water Supply	**A4.1 – not demonstrated** DFES notes that the BMP shows fire water tanks in areas of BAL40/FZ which may be impacted by bushfire and attending fire agencies may be unlikely to use a water source threatened by bushfire. Additionally, the water sources from a private dam is generally not accepted to be a reliable dedicated supply. Any outcomes-based approach proposing to use the dam is to be justified by a water quality and hydrology report prepared in accordance with DFES guidelines GL-06 Acceptable sources of Water Supply for Fire Hydrant / Sprinkler Systems (Bores, Dams, Rivers, Lakes and Seawater). Water tanks dedicated for firefighting purposes and adjacent hard-standing should be located in BAL-29 or below and be accessible to a type 3.4 appliance.	Modification to the BMP is required.

4. **Policy Measure 7.7 Vulnerable land uses**

Issue	Assessment	Action
Bushfire Evacuation Plan (BEEP)	The referral has included a *'Bushfire Emergency Plan'* for the purposes of addressing the policy requirements. Consideration should be given to the Bushfire Emergency Plan (BEP) Manual (as published by the WAPC). This contains detail regarding what should be included in a BEP and will ensure the appropriate content is detailed when finalising the BEP to the satisfaction of the Shire.	Comment only.

Recommendation – compliance with acceptable solutions not demonstrated – modifications required

It is considered critical the bushfire management measures within the BMP are modified to ensure they are accurate and can be implemented to reduce the vulnerability of the development of bushfire.

The proposed development has not demonstrated compliance with Bushfire Protection Criteria 8: Development – Vulnerable tourism land uses and day uses.

In addition, the decision maker is to be satisfied that the location and broader landscape is suitable for the proposed development (vulnerable land use) which is in a bushfire prone area with an extreme bushfire hazard on multiple aspects that is considered to present an unacceptable risk to people, property and infrastructure.

If you require further information, please contact Land Use Planning Officer – Kelsie Petrelis on telephone number 9395 9961.

Yours sincerely

Desmond Abel
DIRECTOR LAND USE PLANNING

6 May 2025

Erin Gower

Development services officer

SHIRE OF NANNUP

Dear Erin,

Thank you for the opportunity to provide comment on the proposed development on lot 4027 Barrabup road, Nannup

I must strenuously object to the proximity of the CARAVAN PARK area to my residence and machinery sheds.

I am mostly resident at Hithergreen near Busselton and am concerned about the security of my premises in my absence, being a bulldozing contractor for Forest Products.

Another concern is the safety of patrons of the CARAVAN PARK with children straying onto dams both on my property and the applicants

Also bear in mind the café/farm shop possible hours of operation will be 7 am to midnight ,seven days a week, meaning patrons may stray unwittingly, on to my property.

Yrs, etc

BOB DENHAM

PO box 4

NANNUP 6275

12/5/2025

SHIRE OF NANNUP
RECEIVED
Ref: A32 No:
19 MAY 2025
Officer: DS.