

Attachment 11.7.5

Loose Goose Chalets

Kieran and Lyn Curtis

370 Barrabup Road, Nannup

info@loosegoose.com.au

Dear Erin

Thank you for sending through the correspondence for our Development application, there were not as many as I thought there might be, although the DFES one is of concern, we are hoping Louise Stokes can give us some direction on how to move forward with that. In response to the concerns from other residents I offer the following reply

Disabled parking bays- We will instal signage at the area closest to the building for 2x disabled parking bays

Noise emissions- By changing from a function centre to a restaurant we believe this will lessen the risk of loud party goers which currently hire the venue. Changing to a restaurant with a license means we will be onsite at all times and be able to have more control on the happenings in the venue. We are hoping to still host weddings and private functions but due to having a liquor license we will have strict rules and laws to follow which will dictate more control from us on the guests.

Construction times will be adhered to as we will still be having guests stay in the chalets during our redevelopment and this will require noise to be kept to a minimum for their comfort during their stay, so we will be very aware of construction noise.

There will be no dust, smoke, fumes or offensive odours due to the development

Caravan Park- We will follow all provisions of the Caravan Parks and Camping Act 1995 and will apply for the corresponding license. Waste water disposal (sewage) will be installed according to regulations and we will have a 100 000lt Water tank which will collect rain water from our 16mx 10m Shed. It will also be fillable from our bore which is what we currently use on the property for our water supply

Number of Guests- We are applying for a maximum 20 bay caravan park with an ablution block which will have 3x toilet/shower/hand basin unisex cubicles (one being wheelchair accessible) with one extra toilet at the end of the cubicles. There will also be a stand alone hand basin on the veranda of the building. We have said 100 guests to allow for families to stay in a bay but in reality that could be reduced to 60 guests if needed.

Function Centre- We will provide all necessary documentation, plans and specifications to the Shire. There is already waste disposal at site but I am unsure on how to show what that is exactly as it was constructed before our time on the property, but we will certainly comply with what is required. There is a current water tank at the function centre that we use that has passed water tests in the past, so will continue to have that tank tested and use it.

We will install a grease trap and obtain an amended certificate of approval as well as the appropriate liquor licenses

Parks and wildlife- We understand that Gracillis road is not yet an approved gazetted road for fire evacuation but as the shire is looking into this as a future development we had that built into our plan as a future possibility, the plan has the details included for evacuation without the Gracillis road access (including maps) we would only use the Gracillis road option if and when that becomes an option. We did not want to have to pay for the whole process to be done again in the future if this option becomes available.

We treasure our Flora and fauna on our property, and it enhances our guest experience. We will undertake measures to control Bracken, leaves that can be a bushfire risk, including upkeep of fire breaks, which we currently do.

Sustainability plans- We are installing a 100 000lt Water tank which will collect water from our newly erected 16mx10m shed. This tank will be fillable via our bore during bush fire season if the level drops below the required baffled 20 000lt mark. The water tank will be used for the ablution block and 5 bays only. The remaining bays will be self-sufficient bays. The function centre currently has a water tank which we fill from the bore. I would suggest the water usage at the function centre will not increase as the usage will change from multiple guests showering to being used in the kitchen only, but I will admit until we are operational I cannot predict the water usage for either the Caravan park or Café/farm shop as we have not established how busy the venture will be.

Sewage- We will instal sewer tanks for the onsite treatment and disposal of Effluent and liquid waste in accordance with Health regulations to the satisfaction of the Shire and Department of Health.

Rubbish disposal- We will have general waste bins, recycle bins and containers for change bins available with signage to encourage correct usage. As we live on site these will be monitored and emptied/sorted regularly as we already do for our chalets and function Centre. Food waste from the Café/ farm shop will be used for chickens/geese where appropriate and also in our existing compost.

Traffic concerns- There is this potential for increased traffic on Barrabup road, but as our function centre is currently licensed for 150 guests and we regularly have functions for 80 -120 guests on weekends and are 80% booked throughout the year, we are hoping the flow of traffic will become more spread during the day instead of all guests arriving at the same function start time which is usually at peak animal movement time along Barrabup road. Personally, I have been advocating for a bike trail/ widened road along Barrabup road for some time due to the already increased bike and pedestrian use along Barrabup Road. I totally agree that this would be of benefit to all residents of North Nannup. It is currently not safe to ride into town along Barrabup r

oad and we encourage our guests to take the Timberline trail which we have direct access to at the rear of our property. The Caravan park will rarely be at capacity, we anticipate 5-10 caravans maximum per week for the majority of the time. The bays will be unpowered with minimum water supply, so the local current caravan park will suit the needs more efficiently for most travellers. We are aiming to expand our accommodation options for our existing guests who often travel in family groups and would like the option for a combination of camping and chalet accommodation. Our other target group are trail users who come with swags and want an option to shower. The exception for 100% capacity would be during large events. It seemed pointless to build a Camping site that could not benefit Nannup during large events.

Wild life- We currently and would continue to advise our guests of the dangers of wildlife crossing along Barrabup road both verbally and with booking confirmation correspondence with our guests. Our location encourages a lot of nature loving guests and we try our best to influence their driving

awareness when staying at the Loose Goose. We will put signage up at the Exit gate to remind guests to travel with awareness for the few guests that we don't get to physically talk to on departure.

Fire Risk- We have completed a comprehensive Fire evacuation plan in accordance with Shire regulations. Our function Centre has been operating for 20 years and the Chalets coming up to 40 years. The Function Centre is licensed for 150 guests and has not caused any traffic complaints that I am aware of. If evacuation is required we would certainly not wait until the last minute, our guests will be evacuated immediately, following all stipulations of the approved Evacuation plan. In catastrophic fire condition risk days our guests are evacuated before there is any sign of fire as stipulated in our plan. We have a fire fighting unit on site, we have had the North Nannup fire Brigade visit our property in the truck to give advice on our fire breaks/property tracks for fire fighting purposes, we have our fire breaks done annually.

Opening Hours- The stated opening hours are to cover possible operation times. We are hoping to be open for breakfast and lunch with the possibility of catering for private functions in the evening or evening meals if the demand is there. We are unsure if the venture will be 7 days a week but would like the option. We will abide by the regulations and laws of our liquor license.

Wetlands Area- The exit road onto Barrabup road will not go through the "wetlands area" in front of our existing dam. The exit road will be closer to the fence line and runs between the dam wet area and the Paper bark trees. No Paper barks will be removed. The caravan exit road on the property will be limited to 10km per hour travel and will be fenced. We encourage nature at our property and it is why most guests choose to stay with us.

Bushland adjacent to our property- We will not and never have encouraged our guests to enter the bushland opposite our property. We encourage our guests to use the Timberline trail for bush walking and riding and we provide trail maps and encourage the use of the Experience Nannup App for trails. We also encourage dogs to stay on leads on these trails due to the use of baits in the areas. While we admit we cannot fully control the behaviour of our guests while they are not on our property we do our best to educate them on the area.

We would like to thank everyone for their letters of support and for the letters of concern with the opportunity to respond. It is difficult to portray in a development application the intent of the project as it requires you to cover the extreme possibilities. We love living in North Nannup and do not wish to change the appeal, but our experience since taking on the Loose Goose as shown us that there is not enough accommodation or Food outlets in Nannup and we would like to be able to contribute positively to help alleviate these short falls. We have waited to get a feel for what might be needed in Nannup and we are excited to offer a new dining experience for both locals and visitors to our town. The caravan park will provide visitors with self sufficient accommodation options and overflow camping facilities for larger events in town.

We will provide further feedback on the DFES requirements once available

Kind regards

Kieran and Lyn Curtis

Hi Erin

I was surprised there wasn't a response from Mr Denham in the original responses. I would like to reply with some solutions to his worries

Proximity and security- We will erect a second fence 15 meters from the existing fence line which is where our over flow sites will be (meaning we will only use these sites during busy event times. Other sites will be 35 metres from the fence line. This will provide an extra barrier from our property to Mr Denhams property and we will plant screening shrubs along that entire fence line as well as place signage on the existing fence to advise No entry into adjoining property.

Dams- Guests will be advised of dams on both properties both verbally and by signage stating strictly No access to dams allowed. The Caravan park is fenced along the Dam and there will be no gate access along that fence. The extra fence installed 15 metres from our existing neighbours Dam will also provide extra safety.

Operating hours- 7am - 12 midnight is to cover possible trading hours, we regularly host functions now to midnight at the function centre and by changing to a Cafe our focus will be more on breakfast and lunch trade with the option to host a private night function occasionally, hence the midnight time frame. It certainly will not be 7 days a week for that operating time, it just gives us an opportunity to cater for private bookings and dinner service if the demand is there.

We will continue to live on the property and provide a hosted accommodation experience and will do regular walk through checks and we can see the park area from our existing house so we will be monitoring activity.

Thank you for allowing us to address Mr Denhams concerns.



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Our Ref: 240427
Your Ref: A32
DFER REF: DA621

4 June 2025

Erin Gore
Shire of Nannup
PO Box 11
Nannup WA 6275

Dear Erin,

Re: Response to DFES comments

Please find my response to the DFES comments, as requested, on the following pages.

If you wish to discuss these further, please do not hesitate to contact this office.

Yours sincerely

Mike Scott
Director
Bushfire Prone Planning

BPP RESPONSE TO DFES COMMENTS	
Relevant Authority and Reference Number:	Shire of Nannup A32
Relevant Application:	Loose Goose, 354 Barrabup Road, Nannup
Relevant Document:	Loose Goose Chalets Nannup (BMP) v1.0
DFES Comments - Date and Reference Number:	6 May 2025 DA38621
DFES Comments – Subject Matter(s)	1. Policy Measures 7.1 ii c: BAL contour map 2. Policy Measure 7.1ii e: Compliance with the Bushfire Protection Criteria 8 3. Policy Measure 7.7 Vulnerable land uses
Bushfire Prone Planning (BPP) – Response Date and Reference Number:	04 June 2025 240427

DFES Assessment Note:

- 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 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 sites.
 - Further clarification is required within the BMP of the requirements of SPP 3.7, and the supporting Guidelines as outlined in our assessment below.

BPP Comment:

Bushfire Prone Planning (BPP) acknowledges DFES's comments and input on the submitted Bushfire Management Plan. We appreciate the feedback provided and have carefully reviewed each point raised. The responses below outline how each comment has been addressed, with updates made to the BMP where appropriate to ensure consistency with the *Guidelines for Planning in Bushfire Prone Areas*.

Subject Matter 1		Policy Measure 7.1 (ii) c: Preparation of a BAL contour map	
DFES Comments			BPP Response
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 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.	Modification to the BMP required.	No modification to the BMP required. The BMP appropriately classifies Area 3 vegetation in accordance with AS 3959:2018 Clause 2.2.3.2, with justification provided based on land use and management intent. Additional photos are included to demonstrate the canopy cover and height sticks demonstrate the height. Area 3 vegetation is offsite and cannot be modified or managed by the landowner. Area 2 vegetation is onsite and can be managed by the landowner. The difference in vegetation classification is that Area 3 is solely Melaleuca quinquenervia (Paperbark). Area 2 is denser (over 30% canopy cover and has three tiers of undergrowth- native bushes, bracken and grasses).
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 required.	No modification to the BMP required. An accredited consultant has undertaken a site visit and verified the vegetation classifications, noting aerial imagery cannot be relied upon to undertake assessments under AS3959. There are individual trees within Area 5 that do not exceed 15% canopy cover. The satellite mapping throws the tree shadow longer than it exists. Class G Grassland is the correct classification for this pastureland that is managed by stock.
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 required.	No modification to the BMP required. The proprietors of Loose Goose pride themselves on neat and professional presentation of the property. Trimming the Marri trees and under-clearing the bracken of Area 2 Class B Woodland supports their landscaping vision, improves the aesthetics of the property whilst improving the bushfire mitigation of the area. Both property owners are active fire brigade members and understand the importance of property maintenance, both for winter storms and bushfires.

Subject Matter 1		Policy Measure 7.1 (ii) c: Preparation of a BAL contour map	
DFES Comments			BPP Response
Issue	Assessment	Action	
Policy Intent	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: - 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.	Decision Maker to be satisfied	DFES concerns / comments present as more of an opinion, as opposed to having a basis in State bushfire policy. The land use has been present since 1988 and the function centre has been operating since 2005. DFES concerns have not necessarily recognised the following additional measures in place to manage risk to an acceptable level: • Loose Goose currently operates cabins of overnight stays and a function centre of day use. Loose Goose has an existing Emergency Evacuation Plan and the Shire in partnership with DBCA are progressing the formalisation of Gracillis Road as a public road for the primary purposes of a second evacuation route from North Nannup should the existing public road be compromised. • Gracillis Road is currently a trafficable road and has recently been graded and pot holes filled. The upgrade of this road is simply a governance/documentation issue within Government agencies. • The BMP details that the site will close on days of catastrophic fire danger, in acknowledgment of the extreme bushfire prone vegetation surrounding the site.

Subject Matter 1		Policy Measure 7.1 11 e: Compliance with the Bushfire Protection Criteria 8 Development – Vulnerable tourism land uses and day uses		
DFES Comments			BPP Response	
Issue	Assessment	Action		
Location, and Siting & 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 required	No modification to the BMP required. The BMP appropriately addresses Elements A2.1 and demonstrates that the proposal can comply with BAL-29 or lower at completion, as required. BAL Ratings (A2.1a): The BAL Contour Map correctly reflects the <i>pre-development vegetation extent</i> and existing hazards, consistent with the Guidelines. The BMP does not propose that caravan and camp sites will be located within areas subject to BAL-FZ or BAL-40 post-development. Instead, it clearly states that they can be sited within areas that will achieve BAL-29 or less, based on internal road access, managed areas, and strategic placement of Asset Protection Zones (APZs). This is a large area of land with many options for positioning caravan sites. There needs to be a balance between establishing a caravan park within a natural environment and ensuring a safe bushfire area. This is clearly outlined in Fig 3.2 BAL Contour Map Post Development.	
	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	DFES statement that significant amount of vegetation will be cleared is a gross misrepresentation of the proposal. There is one dead tree to be removed in the north east corner of the development site. Two trees are to be under-pruned. The row of windbreak Eucalypts on the western side of the caravan park have already been under-pruned and fallen branches cleared. This area is now managed. As previously mentioned, presentation of the site is important for a professional business. The proponent has demonstrated through the remainder of their property that ongoing management of the landscape is imperative to operational success.	

Subject Matter 1		Policy Measure 7.1 11 e: Compliance with the Bushfire Protection Criteria 8 Development – Vulnerable tourism land uses and day uses	
DFES Comments			BPP Response
Issue	Assessment	Action	
Siting and Design	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 Landscape Management Plan required	The Landscape Management Plan has been updated to include management of the Eucalypt windbreak to the west of the caravan and camping area.

Subject Matter 1		Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria	
DFES Comments			BPP Response
Issue	Assessment	Action	
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	The BMP details that A3.2 is not compliant, and the <i>Outcomes-Based Approach is Applied to Satisfy SPP 3.7 Required Outcomes</i> has been completed. The BMP has been updated to detail that Gracillis Road is currently trafficable by two way traffic and that it is purely a governance and regulatory upgrade within Government for the road to be approved as a public road. Recent work has been completed to Gracillis Road (grading and filling pot holes) as ongoing maintenance. Gracillis Road will not be a public road prior to the opening of the Caravan Park, however is trafficable now to two suitable destinations.
	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	No modifications required to the BMP. A3.3a and A3.3b have been correctly completed within the BMP. The no-through road turn around is at the end of Barrabup Road.
	A3.5 – not demonstrated The BMP has not clearly stated whether an outcomes-based approach is being applied. 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	Modification to the BMP required	The BMP has been modified to clearly state that the outcome-based approach is relevant. The BMP has been modified to include an outcome-based assessment for A3.4. The outcome-based assessment has already been completed for A3.2 and A3.4. This BMP v1.0 was lodged in January 2025, within the four month grace period of the new guidelines being introduced. Every effort was made to address the new guidelines, including the introduction of the outcome based assessment. Due to the complexities of the new

Subject Matter 1		Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria	
DFES Comments			BPP Response
Issue	Assessment	Action	
	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		Guidelines it has taken until March 2025 for the new template to be completely updated. The wording has not been removed within this BMP, as it is within the four-month grace period as per DPLH guidelines. The BMP has been modified to ensure that the assessment aligns with the Guidelines and in addition to justifying the non-compliance, demonstrates measures to mitigate the risk. A new template has been inserted into the BMP which is more concise and easier to read.

Subject Matter 1		Policy Measure 6.5 c) Compliance with the Bushfire Protection Criteria	
DFES Comments			BPP Response
Issue	Assessment	Action	
	evidence such as publications and State Administrative Tribunal decisions to support the proposal where appropriate. 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.	The BMP has been modified.

Subject Matter 1		4. Policy Measure 7.7 Vulnerable land uses	
DFES Comments			BPP Response
Issue	Assessment	Action	
Bushfire Emergency 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	A BEEP has been developed, along with an evacuation poster. Two scenarios for evacuation have been developed, one based on the existing road network, and the other for when Gracillis Road is classified as a public road.

Additional Photos:

Area 2 Class A Forest:



Area 3 Class D Scrub (with measure staff)



Gracillis Road.

