



Our Ref: 2026/0245
Your Ref: A1098

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

Dear Ms Gower

RE: LOT 7 (60) BLACKWOOD RIVER DRIVE, NANNUP – PROPOSED SHORT-TERM RENTAL ACCOMMODATION AND COMMUNITY EVENT DAY USE - DEVELOPMENT APPLICATION

I refer to your letter dated 15 December 2025 regarding the submission of a Bushfire Management Plan (BMP) (Version 1.0), prepared by Bushfire Prone Planning and dated 17 October 2025, for the above proposed development. The BMP is accompanied by a letter from the proponent dated 20 November 2025 in relation to the proposal.

This advice relates to the *State Planning Policy 3.7 Bushfire* (SPP 3.7) and supporting *Planning for Bushfire Guidelines* (Guidelines), as well as DFES' role and responsibilities as Hazard Management Agency for Fire in Western Australia.

General Comment

- DFES acknowledges that the site currently accommodates a single residential building, and the proposed development includes the addition of three tiny homes for use as Short-Term Rental Accommodation (STRA) for up to two guests per cabin, and the hosting of community events with up to 30 guests.
- DFES notes that while the BMP appears to focus on the STRA, the letter from the proponent details additional day use, utilising two acres of flat meadow on the property for community events for up to 30 people, and that the existing tree cover and additional trees to be strategically added to the property, will provide privacy screening between the different uses.
- DFES also notes that the BMP contains some fundamental inaccuracies in addressing the appropriate Bushfire Protection Criteria (BPC) as per the Guidelines. In particular, comments relating to Element 2: Siting and Design addresses acceptable solutions that appear to apply to BPC 8: Development – Class 9 Buildings which are not applicable to this proposal.
- Specific requirements of SPP 3.7 and the Guidelines are to be further addressed in the BMP as outlined in the below assessment Tables 1-4.

Recommendation: Compliance with acceptable solutions / outcomes-based approach not demonstrated – modifications required

DFES advises that the BMP and proposed development do not comply with the Element 3: Vehicular Access requirements of SPP 3.7 and the Guidelines.

Additionally, the BMP has not demonstrated that the proposed development complies with the following requirements of SPP 3.7 and the Guidelines:

1. Element 2: Siting and Design; and

2. Element 4: Water Supply.

DFES recommends the BMP be modified as per the Assessment advice provided in Tables 1-4 to ensure it is accurate and the bushfire risk management/mitigation measures are effective and can be implemented in perpetuity to manage/mitigate the bushfire risk to people, property and infrastructure to an acceptable level and appropriate to the land use and location. The required modifications are listed in the table(s) below. Should the modified BMP affect the design of the proposal, the proposal should be amended to reflect these modifications.

Could you please forward notification of the application determination to DFES for our records.

If you require any clarification or further information regarding the below assessment, please do not hesitate to contact Emma Gough – Senior Strategic Land Use Planning Officer on telephone number 9395 9877.

Yours sincerely

Desmond Abel
DIRECTOR LAND USE PLANNING

9 February 2026

Table 1: Assessment – Policy Measure 7.1 ii. c. Compliant Preparation of a Bushfire Attack Level (BAL) Contour Map

Vegetation Classification or Exclusions	BMP Modification Required
<u>Classified Area 3 – not demonstrated</u> In Appendix A, Section A1.2: Vegetation Assessment and Classification of the BMP, the classification tables for Areas 3 and 4, G: Grassland, includes a statement that “Native and seeded grasses that are managed by kangaroos.” The management of vegetation by kangaroos is not under the control of the landowner and the statement should be removed. Th decision maker should be satisfied that the BMP provides vegetation management measures in accordance with AS 3959. If unsubstantiated, the vegetation should be classified as per AS 3959, or the resultant BAL ratings may be inaccurate.	BMP to be modified for accuracy purposes only. The decision maker to be satisfied with the vegetation management proposed.
<u>Classified Area 5 – not demonstrated</u> There is limited photographic evidence to support the vegetation exclusion within all classifications of Area 5, including those located on adjacent lots. The decision maker should be satisfied that Section 6 of the BMP and the Landscape Management Plan provide a legal, enforceable mechanism for the management of neighbouring Lots 6 and 8 to a low-threat standard in perpetuity. This is required to provide certainty that the proposed management measures within the BMP can be enforced by the decision maker. If unsubstantiated, the vegetation should be classified as per AS 3959, or the resultant BAL ratings may be inaccurate.	BAL Rating cannot be validated. Insufficient information. The decision maker to be satisfied with the vegetation exclusions and vegetation management proposed.
SPP 3.7 Appendix A - Bushfire Assessment Methodologies	BMP Modification Required
<u>Bushfire Attack Level (BAL) Contour Map</u> DFES acknowledges that the BAL assessment was undertaken based on the specific location of the proposed buildings, and individual BAL Contour Maps provided. Noting that the proposal includes day use for community events, a BAL Contour Map for the entire subject site may be more appropriate, to demonstrate the potential radiant heat impacts and associated indicative BAL ratings in reference to any classified vegetation within 150 metres of the subject lot.	Comment Only. Insufficient information. The decision maker to be satisfied with the potential radiant heat impacts across the subject site, including day use activities.

The information derived by this tool is useful in ensuring the entire proposed development is located in areas with the least possible risk of bushfire. On this basis, it helps decision makers and proponents determine the suitability of the location of the proposed buildings and ensure that the bushfire risk across the site (including the existing buildings) is also understood.	
Method 2 DFES notes that in Section 5.4, Outcomes Based Approach (OBA) for Element 3: Vehicular Access A3.5 – On-site shelter, a Method 2 calculation was undertaken. The BMP has determined that an onsite safer space (2kW/m²) is not achievable, however no evidence of the calculation or location of the proposed onsite safer space has been included in the BMP. Notwithstanding, DFES notes that the requirement to consider an onsite safer space relates to BPC8: Development – Class 9 buildings. For this proposal, assessment relating to BPC8: Development – Vulnerable tourism land uses and day uses should have been undertaken, where the consideration for an on-site shelter is made, in cases where A3.2, A3.3a and A3.4 cannot be achieved. The BMP should be updated to apply and assess the proposal to the correct BPC, as per the Guidelines.	BMP to be modified. Method 2 outputs cannot be validated. Inputs to be included as per Table B1 of AS 3959.

Table 2: Policy Measure 7.1 ii. e. Compliance with the Bushfire Protection Criteria 8: Development – Vulnerable Tourism Land Uses and Day Uses

Element	Assessment	Action
Location	Policy Objective 5.1 – objection Although SPP 3.7 states that Element 1: Location is not applicable for development applications in Area 2, DFES as the Hazard Management Agency for WA, objects to a planning proposal that is inconsistent with policy objective 5.1 of SPP 3.7 which seeks to avoid bushfire risk (in the first instance). DFES is of the opinion that policy objective 5.1 cannot be achieved at this location. The proposed development is on a site that has and is exposed to an extreme bushfire hazard on multiple aspects, and in the opinion of DFES the extreme bushfire risk to people, property and infrastructure cannot be managed/mitigated to an acceptable level and is inappropriate for the vulnerable tourism land use at this location.	HMA Objection due to extreme hazard.

	The topography, and type and extent of bushfire prone vegetation may result in landscape-scale destruction as it interacts with the bushfire hazard on and close to the site.	
Siting and Design – Asset Protection Zone (APZ)	A2.1b – not demonstrated The proposed habitable buildings are shown to be located in an area of BAL-FZ and require an APZ to be provided, as per the Guidelines. The BMP proposes APZs for cabins 2 and 3 that cannot be achieved within the lot boundary. It has not been demonstrated that a redesign to manage or mitigate the risk is not practical or appropriate. There appears to be an opportunity for the building footprint to be in an alternative and appropriate location within the lot.	Compliance with Siting and Design not demonstrated. Modification to the BMP is required to address the Assessment advice.
Vehicular Access – Access Routes and No-through Roads	A3.2a and A3.3a – not compliant Blackwood River Drive is an existing gazetted public road maintained by the local government; however, access in two different directions to two different suitable destinations, in accordance with the acceptable solution of the Guidelines, is not available until Mowen Road, approximately 3 kilometres from the development site, which exceeds the acceptable maximum length of 200 metres for a no-through road. Additionally, the BMP should demonstrate that the section of the road in excess of 200 metres is wholly within BAL-LOW as per Figure 29 of the Guidelines. The BMP has proposed an outcomes-based approach and DFES provides comment in Table 3 below.	Does not comply. Modification to the BMP is required to address the Assessment advice.
Water Supply	A4.1 – not demonstrated The BMP proposes that a 20,000 litre water tank dedicated for firefighting purposes will be provided, however, it is unclear where the tank will be positioned. Figures 3.1.1, 3.1.2, 3.1.3, 3.2.1, 3.2.2, and 3.2.3 show the location to be within the subject lot, which is inconsistent with the 'Assessment Supporting Details'. This states the tank will be located to the south of the property, and that "This is offsite, however is owned by members of the	Compliance with Water Supply for firefighting not demonstrated. Modification to the BMP is required to

	same family and the tanks will service each lot. Costs are being shared between each property owner.” Additionally, DFES notes that the BMP shows firefighting water tanks in areas of BAL-40 and BAL-FZ which may be impacted by bushfire. DFES as the Hazard Management Agency considers these tanks and adjacent hard-standing should achieve BAL-29 or below and be accessible to a type 3.4 appliance. Appendix B, Table 11 of the Guidelines requires that for each habitable building - 10,000 litres of water per 500m² of floor space, up to 50,000L is provided for vulnerable land uses. Noting that in addition to the three cabins, there is an existing dwelling on site, and the proposed 20,000L capacity does not meet the requirements of the Guidelines. In addressing the acceptable solutions for this element, the BMP proposes back up water supply being a dam on the adjacent property and a standpipe at the North Nannup fire brigade shed located on Dean Road, 5.1 kilometres from Dragonfly Escapes. This is a deviation from the acceptable solutions of this element and should be removed from the BMP.	address the Assessment advice.
Administrative Matters	Administrative matters The BMP contains administrative inaccuracies which should be amended for accuracy. • Section 3.1.3 – Site Assessment Data Applied to Construction of the BAL Contour Map(s) ○ Summary table states BAL Contour maps are figures 3.3, however these are labelled as 3.2.1, 3.2.2 and 3.2.3, duplicating the Figure references for Classified Vegetation & Topography (Post Development) Maps. • Section 5.3.3 – A4.1 Water Supply ○ Check box has been ticked, selecting “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.”. This is inaccurate to the type of development and should be marked ‘Not Relevant’. • Section 5.4.2.2 – OBA Criterion B	

	○ A3.4 is the incorrect reference for Element 3: On-site shelter and should be amended to A3.5.	
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Table 3: Policy Measure 7.5 ii. a) to g) Outcomes-based approach

Element 3: Vehicular Access BMP Comment	DFES Comment
An outcomes-based approach is applied (refer to BMP 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.	DFES acknowledges that due to circumstances outside the control of the landowner, vehicular access cannot be provided in two directions, to two different suitable destinations, which presents an unacceptable risk to vulnerable people during a landscape scale bushfire, and an outcomes-based approach is required as per SPP 3.7.
Outcomes-Based Approach BMP Comment	DFES Comment
Address the acceptable solution to the greatest extent possible For the subject planning proposal, the detailed assessment against each relevant element and each corresponding relevant acceptable solution is presented in Section 5.3. The assessment result is summarised in Section 5.2. Compliance with Element 2 and 4 has been demonstrated within these sections.	The BMP has not addressed acceptable solutions A3.2b, A3.3a, A3.3b, or A3.4 of the Guidelines, in the Element 3: Vehicular Access section, stating they are not applicable however, the proposal includes day use, and Blackwood River Road is essentially a no-through road. DFES disagrees with the statement that compliance has been demonstrated for Element's 2 and 4, as per comments in Table 2 of this response letter. Furthermore, the BMP has applied the incorrect BPC for Element 2: Siting and Design, which has resulted in the incorrect assessment of Element 3, A3.5 – On-site Shelter.
Identify the non-compliance with the acceptable solutions and why these cannot be achieved. For the subject planning proposal, the detailed assessment that identifies the non-compliance against any relevant acceptable solution is	DFES agrees that compliance to A3.2a – Access routes cannot be achieved in this location, as a result of a legacy subdivision layout. Blackwood River Drive is a looped road that connects directly to Barrabup Road to the north and again via Dean Road to the east. Barrabup Road is a no-through road to the west, and the subject lot is approximately three kilometres from Mowen Road, where two-way access is achievable.

presented in Section 5.3.

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.

A3.2a Multiple access routes

Barrabup Road provides access and egress in one direction to two different locations (Busselton and Nannup) and is accessed from the subject lot via Mowen Road and Vasse Highway.

Barrabup Road provides the sole access/egress route for the subject lot to Mowen Road. Currently there are no other legal alternative access/egress options. This is due to a legacy layout when the subdivision was created.

The Shire of Nannup, in consultation with DBCA is in the process of upgrading Gracillis Road (see Fig BEP Fig 2). In a practical sense, Gracillis Road is already trafficable (2 way in all weather conditions) but is yet to be formalised as a gazetted road by relevant agencies. When this road upgrade is completed, the subdivision will have a second legal access/egress and three different locations (Margaret River, Nannup and Busselton) will be easily accessible from the development site.

A3.4 On-site shelter

Calculations using Method 2 Flamesol have determined that an onsite safer space (2kW/m²) is not achievable. Separation distances required from Class A Forest is 160m (not achievable - closest is 58m), Class G Grassland is 90m (not achievable - closest is 58m). The location was on the northern boundary of the property.

Early evacuation is the primary message in a bushfire emergency.

Mowen Road provides access to Busselton to the west, however this is through extreme bushfire hazard vegetation.

Comments relating to Gracillis Road, which is not a formally gazetted road, should be removed from the BMP as this is not under the control of the landowner and cannot be relied upon to justify compliance.

As per comments in Tables 1 and 2 of this response letter, it appears that the incorrect BPC has been used and the methodology for the Method 2 calculation is not provided.

Once Gracillis Road is formalised, the Bushfire Management Plan will be compliant with the technical requirements of the Planning for Bushfire Guidelines.	
Detail how the design addresses bushfire risk and where additional bushfire risk management measures have been deemed necessary and included to minimise the risk. BAL-29 requirements will be implemented to provide bushfire resilience to the proposed site. Additional measures include a commitment to manage and maintain in perpetuity the APZ around the cabin sites as per the Landscape Management Plan. Acknowledging the site's non-compliant access and the proposed intensification, an additional bushfire risk management measure (a Bushfire Evacuation Plan (BEP) has been developed. The BEP will ensure visitors are well informed of early evacuation procedures, providing an additional precautionary measure beyond standard bushfire planning requirements.	The demonstrated bushfire analysis should highlight any risks with the proposal design and level of proposed infrastructure. Once these issues are known additional bushfire management measures can be identified to minimise these risks. An outcomes-based approach requires a greater level of mitigation of the bushfire risk than that provided by the acceptable solutions of the Guidelines. The cabins (pre-development) are located in areas of BAL-FZ and there are existing acceptable solutions within the Guidelines, such as the provision of an APZ, to mitigate the risk. Additionally, section 8.3.1 of the Guidelines requires the preparation of a BEP for all vulnerable land uses and therefore these measures are not considered additional in this context. The BMP justifies the development in its current form without making any adjustment to increase hazard separation, beyond that required by the Guidelines. This is not considered in line with the intent of an outcomes-based approach. Once the actual risk has been determined and any additional bushfire management measures to minimise these risks have been identified there will be an element of residual risk. This is the level of risk considered acceptable by the decision maker. It is considered that if the decision maker is inclined to approve the proposal based on the current version of the BMP, there would be an acceptance of a level of unknown bushfire risk to people and property at this location.
Detail if there are any community net-benefits such as improvements to the public road network. The proposal delivers more stringent vegetation management outcome for the subject site that reduces bushfire hazard while preserving mature	While the development may offer some wider community benefit to the Nannup area, the BMP does not provide evidence of localised community net-benefits impacted by the development. The suggested net-benefits listed in the BMP should be more clearly explained and substantiated with relevant evidence. The proposal that more stringent vegetation

vegetation. Surrounding landowners will directly benefit from lower bushfire hazard in the locality; recognising that broader community benefits are limited given the minor nature of the proposal.	management is reducing bushfire hazard that will benefit surrounding landowners is unlikely, given the size of the lot, and the minimal clearing of vegetation proposed.
Include any fire engineering solutions or written evidence such as publications and State Administrative Tribunal decision to support the proposal (where available). Not applicable to the subject planning proposal.	No comment
Outline how the policy outcomes have been achieved. <i>6.3: Ensure the design and capacity of vehicular access and egress provide:</i> • <i>For efficient and effective evacuation to a suitable destination(s); and/or</i> • <i>As a contingency measure for vulnerable land uses, an on-site shelter, where demonstrated appropriate, as a last resort option.</i> The existing road network has been designed and established prior the implementation of bushfire planning requirements (SPP 3.7) in WA. To mitigate the impact of existing non-compliant access, a BEP has been developed to assist visitors staying at the property in evacuation procedures in the event of a bushfire.	No additional bushfire measures to those that are already required in the Guidelines for vulnerable land use, have been proposed in the BMP to mitigate the bushfire risk associated with the proposed development. As per comments in Table 4 of this response letter, Figure 2 of the BEP does not appear to have considered multiple bushfire scenarios for an efficient and effective evacuation of visitors who may be unfamiliar with the area and the various no-through roads. Additionally, as per comments in Tables 1 and 2 of this response letter, the BMP appears to have addressed the incorrect BPC, potentially missing an opportunity to achieve the acceptable solutions, in the first instance.
Outline why approval is warranted by the decision-maker in this instance. In a practical sense, Gracillis Road, including the portion not gazetted, is trafficable and is currently used by North Nannup residents as an egress	It is considered that the BMP lacks evidence to substantiate the claim that the bushfire risk has been reduced to an acceptable level. The reliance on neighbouring landowners to manage vegetation to low threat and/or APZ standard, shared firefighting water resources, non-gazetted roads, and standard mitigation requirements of the Guidelines are considered inadequate to warrant approval of this development in its current form.

road. Hence, once gazetted, this will be a public road to Mowen Road and full compliance will be achieved. The non-compliant two-way access roads are issues with the existing road network, designed and established prior the implementation of bushfire planning requirements (SPP 3.7) in WA, and are beyond the control of the individual landowner.	
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Table 4: Policy Measure 7.1 iv. and Section 9.4.2 of the Guidelines: DFES Role as Hazard Management Agency (HMA)

DFES wishes to provide the below additional advice in its role and responsibilities of HMA for Fire in Western Australia.

Bushfire Emergency Plan (BEP)		Action
Bushfire Emergency Plan (BEP)	The referral has included a '<i>Bushfire Emergency Plan</i>' for the purposes of addressing the policy requirements. Consideration should be given to the Bushfire Emergency Plan (BEP) Manual (as published by the Western Australian Planning Commission). This contains details of information that should be included in a BEP and will ensure the appropriate content is detailed when finalising the BEP to the satisfaction of the decision maker. Figure 2 of the BEP provides routes for a singular evacuation scenario only, which travels through large tracts of Class A Forest. Notwithstanding that two-way access is not available for more than three kilometres, there is opportunity to provide a secondary route should the initial route to the north be unavailable. This will support efficient evacuation of visitors who are unfamiliar with the various no-through roads in this locality.	Comment only.
DFES Other Technical Advice		Action
DFES Regional Operations	- Noting extensive State Forest to the north, west and east of the proposed development. - Access route is only one way with Barrabup Road and Dean Road both no-through roads. Access is only available from Barrabup Road to the north. Gracillis Road is not gazetted or under the ownership of the developer. Also, the Department of Biodiversity, Conservation and Attractions (DBCA) maintenance requirements may not be in continuation.	Comment only.

	• Location of the cabins must allow for all APZ and associated setbacks to be achieved on the parcel of land – especially given the overall size of the parcel of land. • Suitable vegetation clearing should be undertaken to achieve APZ and/or setbacks from the Class A Forest vegetation. • Location of all water supplies to be achieved on the parcel of land. Tank sharing across different parcels of land is not supported as there are different owners and no official binding of requirements should the land ownership change. • If dam on the parcel of land is included in the plan, it will need to be usable all year, have suitable access and hardstand constructed to allow heavy duty fire vehicle/appliance access.	
DFES Land Use Planning	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, environmental health, or any other approvals required by a relevant authority under written laws.	Comment only.

Erin Gower
Development Services Officer
Shire of Nannup
15 Adams St
NANNUP WA 6275



Your reference A1098

DEVELOPMENT APPLICATION 60 BLACKWOOD RIVER DR, NANNUP

Thankyou for the opportunity to comment in regards the above application. The following concerns and comments are a reflection from both the Fire Control Officer (FCO) and a meeting of the Senior Fire Fighting Team and the Executive Committee of the North Nannup Volunteer Bush Fire Brigade.

The addition of more and more short-term accommodation to Nannup and in particular North Nannup is a fact of tourism that we accept and embrace.

As the Shire is aware the North Nannup Brigade has over the last few years has been called out on a number of occasions to deal with fires being illegally lit by short term tenants of existing rental accommodation.

As FCO I have found this to be either:

- A claimed lack of knowledge on behalf of the tenant,
- No knowledge or advice on who to contact after normal working hours,
- A claimed lack of relevant information provided by the owner to the tenant,
- A total disregard for posted advice and a somewhat cavalier attitude,

The Brigade, would like assurances that the Shire of Nannup will, when required take immediate positive action and also make it very clear to the owners of the property that they need to document and implement the most up to date local fire rules and give their tenants the information they need to enjoy a safe holiday.

Taking into consideration that there is one access route in and out of the area (Barrabup Rd) this gives us cause for concern if an emergency should arise especially, one requiring an evacuation to take place.

Fire pits. (cover letter para 6)

Whilst fire pits provide a nice warm fuzzy atmosphere during winter months they need to be controlled and monitored by staff during both the "Restricted" and "Prohibited" periods. The use of a firepit during permit season (03 Nov – 19 Dec and 28 Feb – 15 May) is a privilege and not a right. During these periods Tenants MUST apply for a permit. A duty staff member may apply for a permit on behalf of the tenant but should be onsite during the permit time frame. During the Restricted period we request that the fire pits be removed from the units or secured in a fashion to prevent any usage.

The request for a weekend / public holiday burning permit needs to be undertaken no later than 1400 on the preceding weekday in order to meet mandatory prerequisite reporting.

COMMENTS ON BUSHFIRE PLAN.

Para 3.1 – Consideration should be given to add the FCO's phone number for up to date after hours advice and the issue of permits during the "Restricted" period November to December and February

to May. This is essential over the weekend / Public Holidays when the Shire offices are closed and the Ranger may not be available.

Para 5.1 – In the event of an emergency, having guests and staff muster at the front gate may impede access to incoming emergency vehicles as well as place them in an unwanted dangerous location.

It is strongly recommended that consideration be given to a site in the open area on the northern side of the property.

Para 8.1.1 – Staff Training.

Who would be responsible for the training of staff and to what level?

It would be ideal to see staff become members of a brigade, it would enhance their knowledge of bushfire behaviour, provide them with suitable PPC /PPE and allow them to support us, should the need arise.

The Shire of Nannup has in the past conducted site specific training for commercial properties utilising Shire/DFES trainers who tailored existing courses to suit the property.

This could be done as a site-specific modified course similar to DFES Rural Fire Awareness, a total of around 6 hours max.

Undoubtably this would incur a cost.

It is noted that training will be conducted on a yearly basis or as new staff become employed.

A staff representative should be encouraged to attend the North Nannup VBFB meetings as this will keep them up to date on the latest changes and any occurrence due to occur in the local area.

EMERGENCY EXIT STRATEGY.

We question the theory behind having only one possible Evacuation Route to the intersection of Barrabup and Mowen Roads – that is:

- Out of the property gate, left onto Blackwood River Drive,
- Right onto Barrabup Rd to intersection of Mowen Rd

There is a second viable option:

- Out of the property gate, right onto Blackwood River Drive,
- Left onto Dean Rd,
- Right onto Barrabup Rd then on to the Mowen Rd intersection.

The difference in distance between the two is 530 Mts.

This 2nd highlighted option **must** to be included on both figure 1 “Site Emergency Information” and on figure 2 “Evacuation Routes and Destination map”

There are 2 other options available but we feel that they are unsuitable. One being Gracillis Rd and the other via Greenwood Rd.

We believe that for the safety of the guests and staff that both Evacuation options **must** be presented and **displayed appropriately within each accommodation unit.**

Trained staff, if onsite should then be able to provide the best advise the guests of the route to take based on information garnered from the Shire of Nannup and /or the North Nannup FCO

As the owner is targeting international guests any emergency information within the units needs to cater for their native language. It cannot be assumed that the guests will have a full comprehension of the English language.

It is good to note that a large-scale area plan will be located at the emergency assembly area detailing all relevant information which will benefit tenants, staff and Emergency services alike.

It is reasonable to assume that should there be an incident at the western end of Blackwood River Drive incoming emergency vehicles would use Barrabup Rd to Blackwood River Drive intersection as their main ingress route. This of course is always subject the type and location of the emergency.

From a Bushfire fighting point of view there are 3 main areas of concern,

- Firstly, the heavy bush and forest on the Western boundary,
- Secondly the lighter stand of bush adjacent the eastern side of the property,
- Thirdly the heavy bush to the North of the property.

FIREWATER TANK.

On the overhead plan (figure 2.1) it is indicated that a Firewater tank is to be located in an area behind the proposed accommodation unit #1. Access to this tank appears to be impeded by existing bus.

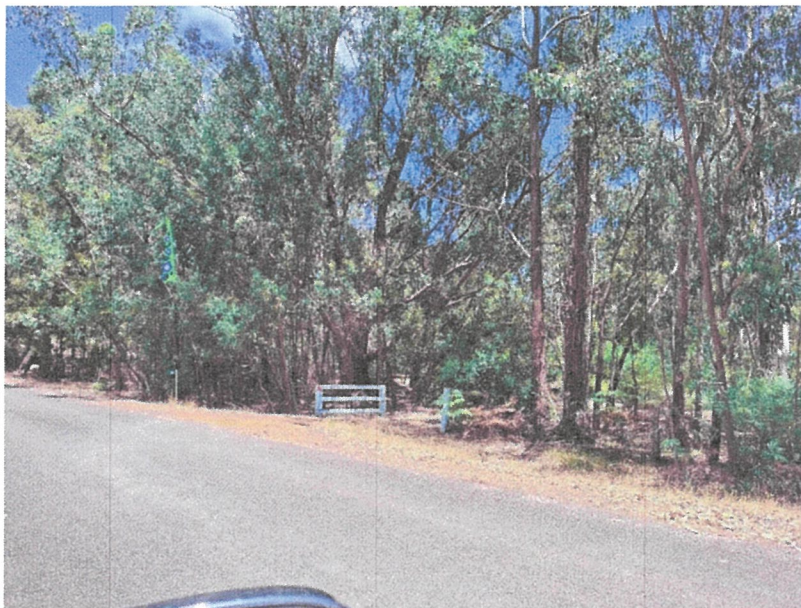
We feel that access will for appliances will be impeded by its close proximity to unit no 1 as well as the current amount of brush surrounding the area.

What will be the capacity of this tank? We suggest a minimum of 20,000Lts.

Our Brigade/CESM will need to be advised of what fittings will be used so that we can sourced any adaptors that are required.

It is also worth noting that this property was identified by the FCO, on 26/10/2025 and again on the 10/12/2025 as being non-compliant under Shire of Nannup 2025-26 Bushfire Risk Compliance Notice due to:

- No compliant fire break on the eastern fence line in particular the southeast corner,
- Branches overhanging the main entry,
- An extensive amount of uncleared ground vegetation and laddering. (refer to attached photographs taken 20.12.2025).
- It is not known by the FCO or Brigade if an approved Variation exists on this property.



The next picture showing the main entry indicates that this area does not meet the 4 x 4 x 4 requirements.



Water tank.

The water tank identified on figure 2.1 is located on adjacent property (70 Blackwood River Drive). Does this tank constitute part of the fire plan and if so, how is access gained and would the brigade have permission from the owners/lessee's to use it? Will there be a dedicated track to access it.

Accommodation fire water.

Available firefighting water in the North Nannup area is very limited (80,000Lts at the North Nannup fire shed plus 10,000Lts behind Lot 124 Blackwood River Drive). There is no accessible water available from the Blackwood River the next closest in The Nannup Golf course with a turnaround period of 30 minutes and 15Kms.

The next closest is the old golf course dam with a turnaround of 22Kms and 40 minutes..

Whilst it is not mandatory within the Shire of Nannup we would like to see that each accommodation unit has a 10,000Lts (minimum) tank attached to the roof or bore water supply for the sole purpose of asset protection.

This should be matched up with a stand-alone pump and roof sprinklers. With the correct size pump and sprinkler system a large majority of the water would be recovered back to the tank. This system could:

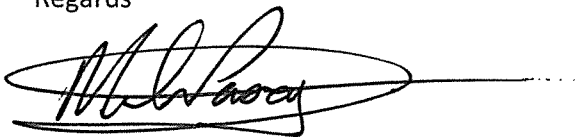
- Provide a last line of unmanned defence for each unit for minimum of 20 minutes based on a 450Lt per min pump. Recycling of the water would extend this time even further.
- Protect assets for the time it takes North Nannup and / the VFRS / other Brigades to respond which is a minimum of 15 minutes.
- Make the units / property a safer environment,
- Give peace of mind to guests, staff and owner,
- Possibly enhance the relevant insurance policy,

Another option could be a larger single tank and pump catering for all of the units simultaneously.

Whilst as a brigade we wholeheartedly support any venture that will bring tourism to our unique area it must be noted that the safety of the area and its occupants takes priority over a commercial gain.

We wish Sally well with her proposed venture and will happy meet to discuss any issues should the need arise.

Regards

A handwritten signature in black ink, appearing to read 'Michael Vasey', enclosed within a large, loopy oval shape. A horizontal line extends from the right side of the oval.

Michael Vasey
BFCO North Nannup
DBFCO Shire of Nannup
0499 509 479
Mikegayle76@yahoo.com