

## 1 SITE DETAILS

### 1.1 Legal description

Refer to **Table 1** below for the lot details and a description of the subject site.

Table 1: Lot details

Lot No.	Plan	Volume/Folio	Street Address	Area (ha)
843	4694	2115/745	217 Moorilup Road, Kendenup	8.0634
844	4694	2115/746	No street address	7.684
<b>TOTAL</b>				<b>15.7474</b>

Refer to **Attachment 1** for a copy of the Certificates of Title and Deposited Plan.

### 1.2 Site context

The subject site is located in the locality of Kendenup, approximately 5km southeast of the Kendenup townsite, 22km north of Mount Barker, and 60km north of Albany.

The subject site is developed with a tourist accommodation and reception centre facility known as ‘Kendenup Cottages and Lodge’. It comprises four self-contained cottages, a manager’s residence and a lodge with four room types, from single room (sleeps 3) to family room (sleeps 9). There is also a function room capable of accommodating 150 people, and a bar/restaurant. Access to the site is afforded via a single crossover (entry statement) on the north-western corner, which leads into an internal driveway providing access to all buildings. Internal paths and driveways service the site.

The subject site is widely surrounded by rural properties developed with cropping and other agricultural enterprises, and including one bed and breakfast. The site is bound by Wandoo Road to the north and Moorilup Road to the west, which provides direct access to Watt Road/Carbarup Road 800m to the south.

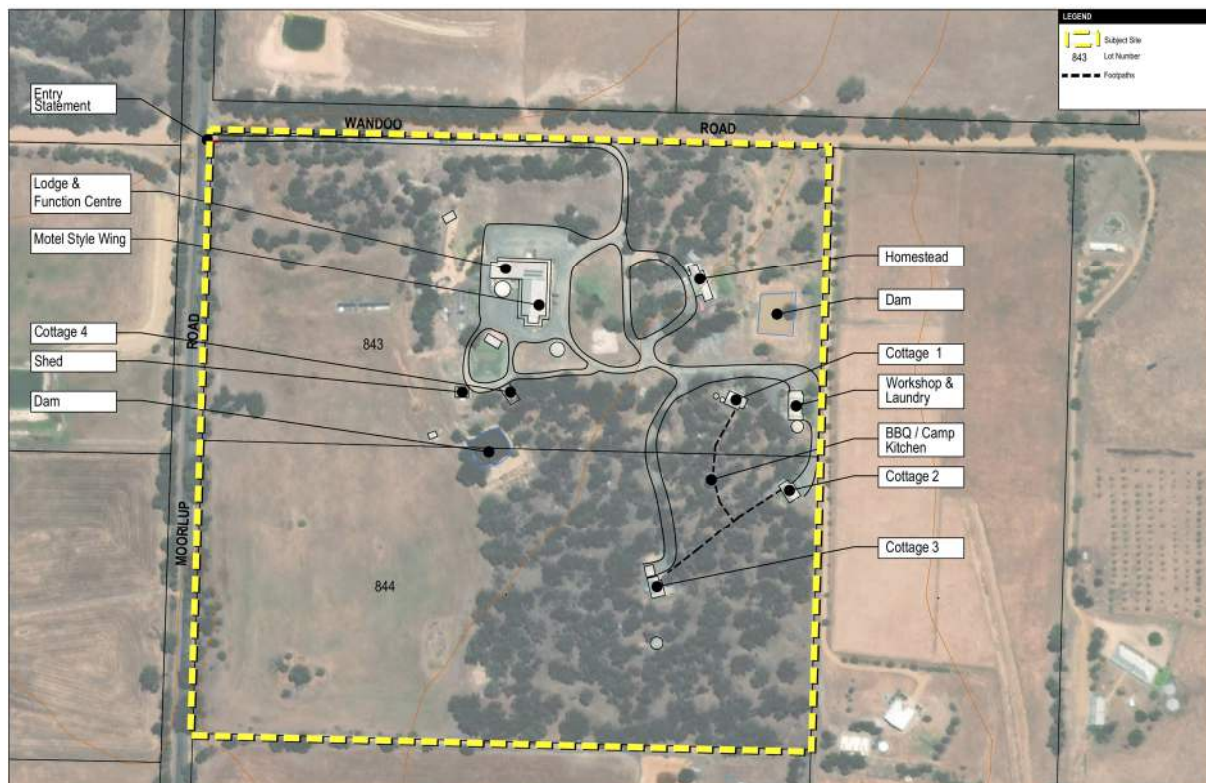


Figure 1: Site plan of the subject site’s existing conditions

## 2 BACKGROUND

### 2.1 Previous Approvals

We have obtained copies of planning and building approvals from the Shire of Plantagenet (**Shire**). A review of the relevant approvals is outlined below.

#### P4161 – 1998 Approval – Residence and Chalets

On 26 May 1998, Council approved the development of a residence and chalets on Lot 843. The approval allows for no more than three (3) chalets on the lot.

#### N206 – 2004 Approval – Tourist Accommodation (Conference Facility and Accommodation)

On 9 November 2004, Council resolved to approve an application for a ‘conference facility and accommodation’ with accommodation for up to 24 guests and a commercial kitchen on Lot 843.

On 28 April 2005, a building licence was issued for the construction of a lodging house per the 2004 planning approval. This licence permitted a dwelling house or a building comprising two dwellings on ground level. Specifically, the building licence approved the construction of a 6 bedroom, fully serviced apartment building with associated residents’ kitchen, spa and sauna facility. The facility was licenced with a combined maximum occupation of the two rooms not exceeding 200 persons at any one time.

In July 2011, a building license was issued for the expansion of the lodging house, which included an additional food premises and two dining areas. This expansion was licenced with an additional maximum occupation of 60 persons between the two new dining areas.

Accordingly, the capacity for the lodging house is a maximum of 260 persons at any one time.

#### O22406 – 2010 Approval – Managers Residence

On 11 October 2010, planning consent was granted to develop a manager’s residence for the Kendenup Lodge and Cottages on Lot 843.

### 2.2 Engagement with the Shire

Planning Solutions spoke with Will Hosken, Manager Planning & Development Services at the Shire of Plantagenet, regarding the most appropriate planning pathway to facilitate the proposed change of use. During these discussions, it was accepted an application could be made for a change of use from one non-conforming use to another, subject to appropriate justification.

A management plan was to address management the proposed use to address any possible impact to the community. An Operational Management Plan, prepared by Cyrenian House, has been prepared and is attached to this application.

## 3 PROPOSAL

This development application seeks approval for the change of use of the existing buildings on the subject site for the to allow the site to be used as the Great Southern Drug and Alcohol Rehabilitation Centre (**GSDARC**). The GSDARC will provide accommodation for up to 20 adult residents of mixed gender, both Aboriginal and non-Aboriginal, accessing the following program components:

- A Residential Rehabilitation Program for up to 16 adults to address alcohol and/or other drug use; and
- A Low Medical Withdrawal Unit for up to 4 adults who require withdrawal.

The staffing structure includes a manager, clinical coordinator, a nurse, counsellors, residential support workers, as well as a range of other clinical and support staff. The facility will be staffed at all times, as follows:

- Day shift (7am-7pm): up to 7 staff on duty at any one time
- Evening and night shifts (6pm-11pm and 11pm-7:30am): at least 2 staff on duty at any one time

Visitor hours will be limited to 9am-4pm on Sundays.

The GSDARC is an initiative of the Western Australian state government and is being funded by the Mental Health Commission.

Refer to **Attachment 3**, Operational Management Plan for further details on the facility, operations and service partners.

### 3.1 Service Partners

The Southern Aboriginal Corporation (**SAC**), as the lead agency, has formed a partnership with Cyrenian House to implement and operate the GSDARC. Consistent with the *Aboriginal Empowerment Strategy – Western Australia 2021-2029*, SAC and Cyrenian House are strongly committed to working together, with SAC as the lead agency to realise the GSDARC as an ‘Aboriginal led solution’. Both organisations have strong track records as community service providers in their own right, with over 80 years’ experience combined.

A summary of each organisation is provided below. Additional local subcontracting partners will be engaged to support the delivery of the effective and comprehensive program associated with GSDARC.

#### 3.1.1 Southern Aboriginal Corporation

SAC, established in 1983, is a leading Aboriginal Community Controlled Organisation in Western Australia, with services spanning the Great Southern, Wheatbelt and Southwest regions. SAC offices are located in Albany, Katanning, Bunbury and Narrogin, from which services are delivered to 17 regional and remote locations. SAC employs 37 staff who support over 1,000 people each year.

SAC supports the unique and evolving needs of local communities by promoting Noongar social and cultural values and implementing a culturally informed, trauma integrated healing approach.

In 2019, SAC in partnership with Cyrenian House, opened the Nannup Therapeutic Community facility. Since commencement of operations, they have been regarded as considerate stakeholders that contributed positively to the local amenity, community life and local businesses. Importantly, the standard which residents and service workers maintain the Nannup Therapeutic Community facility has enhanced the amenity of the locality. Refer to **Attachment 5**, Letter of Support from Shire of Nannup’s Chief Executive Officer.

#### 3.1.2 Cyrenian House

Cyrenian House is the largest provider of specialist alcohol and/or other drug (**AOD**) treatment services in Western Australia, with a strong track record in delivering effective, evidence-based programs since 1981.

Cyrenian House employs 250 staff who support over 4,000 people each year, including 600 who access residential therapeutic communities.

Cyrenian House’s capability and service quality are reflected in the long-standing confidence placed in the organisation by key government agencies. Over many years, it has been contracted to deliver high quality AOD services, including the Mental Health Commission, Department of Justice, the WA Primary Health Alliance (**WAPHA**), and the Department of Health (Commonwealth).

### 3.2 Proposed building uses

**Table 2** below describes the proposed uses of the existing buildings on the site.

Table 2: Proposed use of existing buildings

Legend on plans	Description of existing facilities	Proposed use
Lodge and Function Centre	<ul style="list-style-type: none"> <li>Commercial grade kitchen</li> <li>Restaurant</li> <li>Function Centre and adjoining conference room</li> <li>Office</li> </ul>	<ul style="list-style-type: none"> <li>Commercial grade kitchen for resident meals</li> <li>Resident dining room</li> <li>Function centre running group programs, resident meetings, and all site meetings</li> <li>Reception and administration area</li> </ul>

Legend on plans	Description of existing facilities	Proposed use
Motel Style Wing	<ul style="list-style-type: none"> <li>9 rooms</li> <li>Fully equipped kitchen</li> </ul>	<ul style="list-style-type: none"> <li>9 rooms providing accommodation for 16 GSDARC residents, and for 1 resident nearing completion of their low medical withdrawal program</li> <li>Fully equipped kitchen for residents' use</li> </ul>
Homestead	<ul style="list-style-type: none"> <li>3 bedrooms, bathroom, dining and living areas</li> </ul>	<ul style="list-style-type: none"> <li>Low Medical Withdrawal Unit comprising 3 bedrooms providing accommodation for 3 for low-medical withdrawal residents</li> </ul>
Cottage 1	<ul style="list-style-type: none"> <li>2 large bedrooms, kitchen, bathroom, dining and lounge</li> </ul>	<ul style="list-style-type: none"> <li>Staff offices and treatment room for low medical withdrawal unit</li> </ul>
Cottage 2	<ul style="list-style-type: none"> <li>2 large bedrooms, kitchen, bathroom, dining and lounge</li> </ul>	<ul style="list-style-type: none"> <li>Staff area and offices for Therapeutic Community program</li> </ul>
Cottage 3	<ul style="list-style-type: none"> <li>2 large bedrooms, kitchen, bathroom, dining and lounge</li> </ul>	<ul style="list-style-type: none"> <li>Counselling/treatment room(s)</li> <li>Staff room</li> </ul>
Cottage 4	<ul style="list-style-type: none"> <li>1 bedroom</li> </ul>	<ul style="list-style-type: none"> <li>Residential Supervisor (staff) overnight accommodation</li> </ul>
Workshop and laundry	<ul style="list-style-type: none"> <li>Large workshop</li> <li>Separate laundry</li> </ul>	<ul style="list-style-type: none"> <li>Laundry for residents' use</li> <li>Resident and staff workshop area</li> <li>Manual works program delivery</li> <li>Storage of equipment and materials</li> </ul>
Camp Kitchens / outdoor BBQ	<ul style="list-style-type: none"> <li>Outdoor cooking and dining</li> </ul>	<ul style="list-style-type: none"> <li>Resident cooking and dining</li> <li>Cultural activities</li> <li>Leisure area for residents</li> </ul>

### 3.3 Parking

The property comprises 16 hectares, providing ample space for staff and visitor parking. It is important to note that the parking demand associated with the GSDARC will be significantly lower than that associated with the existing use.

Up to 7 staff will be accessing the site during peak shifts. Importantly, traffic volumes will be associated primarily with staff shifts, visitors and deliveries, as visits from family members will be planned and scheduled to avoid excessive peaks. Additionally, residents will not have their own vehicles on site.

Parking for staff and visitors will be contained entirely within the property boundaries, utilising the existing gravel car park located adjacent to the current function/dining and motel facilities. Parking signage will be installed prior to the commencement of operations to clearly delineate designated parking areas.

### 3.4 Waste

Waste disposal is managed through two methods:

- A monthly skip bin service contracted through Albany Skips; and
- The use of tip passes at the Kendenup Waste Transfer Station.

### 3.5 Bushfire

The subject site is located within a designated 'Bushfire Prone Area' in accordance with the Department of Fire and Emergency Services (**DFES**) Map of Bushfire Prone Areas. A Bushfire Management Plan (**BMP**) was prepared in support of this change of use development application.

A Bushfire Attack Level (**BAL**) assessment has been completed for the proposed building in accordance with AS3959-2018 methodology. The assessment has outlined bushfire risks associated with the proposed

change of use and operations on the site. The report provides a number of recommendations and measures to assist in mitigating the bushfire risk for the proposed development, which the proponent and operator will seek to implement, both prior to occupancy and as ongoing management.

Refer to **Attachment 4**, Bushfire Management Plan.

## 4 TOWN PLANNING CONSIDERATIONS

### 4.1 Shire of Plantagenet Local Planning Scheme No. 5

The Shire of Plantagenet Local Planning Scheme No. 5 (**LPS5**) applies to the subject site.

The provisions of LPS5 are supplemented by the **deemed provisions** at Schedule 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015*. Where a deemed provision and a provision of LPS5 are in conflict, the deemed provision prevails.

#### 4.1.1 Zoning

The subject site is zoned Rural pursuant to the provisions of LPS5.

The objective of the Rural zone under LPS5 is:

*To provide for the maintenance or enhancement of specific local rural character.*

*To protect broad acre agricultural activities such as cropping and grazing and intensive activities such as horticulture as primary uses, with other rural pursuits and rural industries as secondary uses in circumstances where they demonstrate suitability and compatibility with the primary use.*

*To maintain and enhance the environmental qualities of the landscape, vegetation, soils and water bodies, to protect sensitive areas especially the natural valley and watercourse systems from damage.*

*To provide for the operation and development of existing, future and potential rural land uses by limiting the introduction of inappropriate sensitive land uses in the Rural zone.*

*To provide for a range of non rural land uses where they have demonstrated benefit and are compatible with surrounding rural uses.*

The proposed use provides an invaluable service to the community. By providing adequate support and services, the well-being of individuals is improved. This has a flow-on effect of providing an overall community-wide benefit. Individuals who are able to receive adequate support and care services are less likely to remain on the street where they might otherwise cause harm to themselves or other people in the community. The proposal is therefore consistent with the relevant objective of the zone.

Additionally, and as demonstrated in the attached Operational Management Plan, the use will be managed in such a way so as not to interfere with the amenity of the surrounding rural area. This is further supported by a letter of support from the Shire of Nannup (refer to **Attachment 5**), confirming that the proponent and operator both contributed to the local amenity, community life and local businesses, while maintaining and operating the site in a safe and responsible manner.

#### 4.1.2 Use class and permissibility

The 2004 approval for 'tourist accommodation' effectively comprised two separate activities: the accommodation component (with capacity for up to 24 guests) and the conference component (with capacity for up to 260 people). It is important to note that neither component is ancillary to the other. Functions can be booked and operate independently of the accommodation component. Additionally, while attendees to a function may choose to stay at the on-site accommodation for convenience, this is not essential for either activity to function. Furthermore, given the capacity of the approved accommodation being 24 persons, any event hosting 260 attendees will necessarily involve off-site visitors.

The former Shire of Plantagenet Town Planning Scheme No. 3 definition of ‘Tourist Accommodation’, which includes both temporary accommodation and convention areas. ‘Tourist Accommodation’ was defined under the former Shire of Plantagenet Town Planning Scheme No.3 (as modified by Amendment 32) as:

**tourist accommodation:** means a building or group of buildings providing temporary accommodation for tourists, visitors, and travellers which may have facilities such as restaurants, convention areas and the like but does not include a building, place or use specifically defined elsewhere in this Schedule;

On 17 February 2021, former Town Planning Scheme No.3 was repealed and replaced by LPS5. The incoming LPS5 did not carry over the ‘Tourist Accommodation’ land use. Instead, the activities of ‘temporary accommodation’ and ‘convention areas’ fall under two distinct (and separate) land use categories under LPS5: ‘Tourist Development’ and ‘Reception Centre’, respectively defined as:

**Tourist Development** A building, or a group of buildings forming a complex, other than a bed and breakfast, a caravan park or holiday accommodation, used to provide —

- (a) short-term accommodation for guests; and
- (b) onsite facilities for the use of guests; and
- (c) facilities for the management of the development.

**Reception Centre** Premises used for hosted functions on formal or ceremonial occasions.

A ‘reception centre’ is a use that is prohibited in the Rural zone pursuant to LPS5. Accordingly, the use of the subject site for a reception centre is, and has been since 17 February 2021, a ‘non-conforming use’, meaning a use of land which, though lawful immediately before the coming into operation of a planning scheme or amendment to a planning scheme, is not in conformity with a provision of that scheme:

A non-conforming use can be changed to another non-permitted use with development approval, pursuant to clause 23 of LPS5:

### **23. Changes to non-conforming use**

- (1) A person must not, without development approval —
  - (a) alter or extend a non-conforming use of land; or
  - (b) erect, alter or extend a building used for, or in conjunction with, a non-conforming use; or
  - (c) repair, rebuild, alter or extend a building used for a non-conforming use that is destroyed to the extent of 75% or more of its value; or
  - (d) change the use of land from a non-conforming use to another use that is not permitted by the Scheme.
- (2) An application for development approval for the purposes of this clause must be advertised in accordance with clause 64 of the deemed provisions.
- (3) A local government may only grant development approval for a change of use of land referred to in subclause (1)(d) if, in the opinion of the local government, the proposed use —
  - (a) is less detrimental to the amenity of the locality than the existing non-conforming use; and
  - (b) is closer to the intended purpose of the zone in which the land is situated.

Based on outcomes of case law and other planning decisions in Western Australia, a premises used for rehabilitation of persons seeking recovery from alcohol and other drugs is classified as a ‘community purpose’ land use under LPS5. ‘Community purpose’ is defined by LPS5 as:

**Community Purpose** Premises designed or adapted primarily for the provision of educational, social or recreational facilities or services by organisations involved in activities for community benefit.

Community purpose is a use that is not permitted in the Rural zone under LPS5. Clause 67(1) of the deemed provisions provides:

Development approval cannot be granted on an application for approval of —

- (a) *development that is a class X use in relation to the zone in which the development is located, unless —*
  - (i) *the development relates to land that is being used for a non-conforming use; and*
  - (ii) *the local government considers that the proposed use of the land would be less detrimental than the non-conforming use;*

The proposal is considered appropriate, as follows:

1. The proposed use will not adversely impact the amenity of the locality. The facility will operate within the existing buildings, and an Operational Management Plan has been prepared to ensure the use is managed effectively and sensitively. Refer to **Attachment 3**, Operational Management Plan.
2. The proposed use aligns with the objectives of the zone by delivering a demonstrated benefit and is compatible with surrounding rural uses. The facility provides essential support and services for individuals affected by alcohol and other drugs, improving individual well-being and, in turn, contributing positively to the broader community.
3. The proposed use is considerably less intensive than the current approved reception centre. The reception centre is approved for a capacity of 260 persons, whereas the proposed drug & alcohol rehabilitation centre will cater for up to 20 clients, thereby proposing to accommodate only one-thirteenth of the capacity of the existing facility. Additionally, where a reception centre may frequently have amplified music, the proposed drug & alcohol rehabilitation centre would have strict controls of noise and other nuisances. It is therefore more in keeping with the Rural zone objectives which limit the introduction of inappropriate land uses and more compatible with rural activities.

Accordingly, the proposal satisfies the LPS5 and deemed provisions criteria for the change in one non-conforming use to another prohibited use, and it warrants approval accordingly.

#### 4.1.3 Development Requirements and Standards

There are no works proposed as part of this application; therefore, no development requirements or standards are applicable.

Additionally, there are no minimum parking requirements for land zoned Rural.

#### 4.1.4 Matters to be Considered

Clause 67(2) of the Deemed Provisions sets out the matters for which due regard is to be given when considering a development application. Refer **Table 3** below for an assessment of the relevant matters.

Table 3: Matters to be considered

Matter to be considered	Provided
(a) <i>the aims and provisions of this Scheme (including any planning codes that are read, with or without modifications, into this Scheme) and any other local planning scheme operating within the Scheme area;</i>	Refer to <b>Section 4.1</b> of this application.
(c) <i>any approved State planning policy;</i>	Refer to <b>section 4.2</b> of this application.
(f) <i>any policy of the State</i>	Refer to <b>Section 5</b> of this application.

Matter to be considered	Provided
<p>(n) <i>the amenity of the locality including the following —</i></p> <ul style="list-style-type: none"> <li>(i) <i>environmental impacts of the development;</i></li> <li>(ii) <i>the character of the locality;</i></li> <li>(iii) <i>social impacts of the development;</i></li> </ul>	<p>The proposed use delivers a demonstrated social and community benefit by providing essential support and services for individuals affected by alcohol and other drugs, improving both individual and overall community well-being.</p> <p>This development application is accompanied by an Operational Management Plan which outlines that the GSDARC residential rehabilitation program and describes the structure of the program based on the Therapeutic Community Model.</p> <p>Importantly, residents of the GSDARC are carefully screened and selected as part of SAC and Cyrenian House’s normal residential assessment process to ensure residents are clear of any significant offences that may cause nuisance to other residents and neighbours. Alcohol and other drugs are strictly prohibited in the facility, and residents are tested throughout the week as part of the treatment regime at the service.</p> <p>As demonstrated in the Operational Management Plan, SAC and Cyrenian House have a strong commitment to best practice in the management of any potential risks. There are many successful examples of similar services located in rural areas in Australia. The Nannup Therapeutic Community facility, operational since 2019, has demonstrated a positive impact on local amenity and businesses.</p> <p>Additionally, a comprehensive Risk Management Plan which identifies risks associated with the GSDARC will underpin the effective management of risk at the facility.</p>
<p>(s) <i>the adequacy of —</i></p> <ul style="list-style-type: none"> <li>(i) <i>the proposed means of access to and egress from the site; and</i></li> <li>(ii) <i>arrangements for the loading, unloading, manoeuvring and parking of vehicles;</i></li> </ul>	<p>The proposal does not propose any alterations to the existing access, egress, or on-site circulation and manoeuvring arrangements. These arrangements are considered suitable to accommodate a use of lower intensity than the current operations.</p>
<p>(t) <i>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;</i></p>	<p>As demonstrated in the Operational Management Plan, current traffic volumes are expected to reduce once the GSDARC is operational. Traffic volumes will be associated primarily with staff shifts, visitors and deliveries, as visits from family members will be planned and scheduled to avoid excessive peaks. Additionally, residents will not have their own vehicles on site.</p>
<p>(v) <i>the potential loss of any community service or benefit resulting from the development other than potential loss that may result from economic competition between new and existing businesses;</i></p>	<p>The proposal will not result in the loss of any existing community service or benefit. Rather, it introduces a much needed community service by providing access to alcohol and other drug withdrawal management and residential rehabilitation programs. These services are particularly vital in regional areas where such support is limited, thereby enhancing community welfare and addressing an identified social need.</p>
<p>(w) <i>the history of the site where the development is to be located;</i></p>	<p>Refer to Section 2 of this application.</p>
<p>(x) <i>the impact of the development on the community as a whole notwithstanding the impact of the development on particular individuals;</i></p>	<p>As demonstrated throughout this application, the proposal demonstrates a community benefit by delivering a critical service to fill an identified social need.</p> <p>Additionally, as outlined in the Operational Management Plan, the facility will be managed in such a way to minimise any potential amenity impacts on the community.</p>
<p>(y) <i>any submissions received on the application;</i></p>	<p>Any submissions will be considered during the advertising period.</p>

## 4.2 State Planning Policy 2.5 Rural Planning

State Planning Policy 2.5 Rural Planning (**SPP2.5**) provides additional guidance on accommodating a diverse range of uses on rural land. Clause 5.5 provides that WAPC policy is to:

*continue to promote rural zones in schemes as flexible zones that cater for a wide range of land uses that may support primary production, regional facilities, environmental protection and cultural pursuits*

In pursuance of flexible rural zoning, land uses serving a community benefit are a natural and incidental component of rural areas. Accordingly, the proposal is one which ought to be supported as a use consistent with the intention of SPP2.5 to promote a diverse range of uses on rural land.

## 4.3 State Planning Policy 3.7 Bushfire

State Planning Policy 3.7 Bushfire (**SPP3.7**) seeks to implement effective, risk-based land use planning and development to preserve life and reduce the impact of bush fires on property and infrastructure. SPP3.7 is the overarching policy for land use planning within bushfire prone areas.

The subject site is within a Bushfire Prone Area. As detailed above, the attached Bushfire Management Plan outlines the recommendations and measures to mitigate any bushfire risk.

## 4.4 Town Planning Scheme Policy No. 19 Kendenup Rural Surrounds

Town Planning Scheme Policy No. 19. (**TPSP19**) seeks to provide guidance to assist in land use control to avoid/reduce land use conflict from the inappropriate location of particular land uses. TPSP19 outlines criteria in assessing land use proposal in the Kendenup rural surrounds. This policy identifies the site to be within 'Future Rural Residential Areas'.

The proposal is consistent with the objectives of the Future Rural Residential Areas, as follows:

- The proposal does not impact on creek lines, native vegetation nor risk of salinity and erosion.
- The proposal is supported by the attached Bushfire Management Plan that provides recommendations to ensure the development is able to mitigate any risk of bushfire.
- The proposed use does not introduce an inappropriate land use nor present a potential risk of land use conflict.
- The proposed use is compatible with surrounding rural activities and will be managed in a way that ensures no detrimental impact to the neighbouring properties as a result of the operations of the proposed facility. As recommended in the Bushfire Management Plan and as outlined in the proposed Site Plans, the proposal will incorporate a 60,000L water tank for firefighting.

## 5 WESTERN AUSTRALIAN MENTAL HEALTH COMMISSION

Through the *Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015–2025 (Plan)*, the State government envisions a mental health, alcohol and other drug service system that prevents and reduces the adverse impacts of alcohol and other drugs, and support people who experience alcohol and other drug problems to stay in the community, out of hospital and live a satisfying, hopeful and contributing life.

The Plan acknowledges the pressing need for increased access to alcohol and other drug withdrawal management and residential rehabilitation services, particularly in regional areas.

Specific to the Great Southern Region, the Plan identified that there are no alcohol and other drug residential rehabilitation beds and low medical withdrawal beds, and by the end of 2025 there needs to be a total of 17 beds and two beds, respectively, to meet demand.

The proposal has at its core a purpose of improving the general welfare of the Shire's inhabitants by filling a gap in the provision of adequate facilities for people with alcohol and/or other drug issues. The need for such

a service has been summarised by the State Government Mental Health Commission, in consultations to finalise the Immediate Drug Assistance Coordination Centre Model of Service, as follows.

*Alcohol and other drug (AOD) issues continue to be a critical challenge for individuals, carers, families and communities across WA. In 2019, about 17.2 per cent of Western Australians aged 14 and over drank alcohol at levels that risk lifetime harm; and about 15.6 per cent had recently used illicit substances. Concurrently, the capacity of the public healthcare system to respond to the needs of those with AOD issues, and those impacted by AOD-related harm, is becoming increasingly constrained.*

*Central to current mental health and AOD reforms is the delivery of better care options for people with mental illness and AOD issues, closer to where they live, while also reducing the pressure on hospital inpatient beds. This is consistent with the Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015–2025 (the Plan) that aims to achieve a more balanced mental health system through investment in community-based treatment and support services.*

By providing adequate support and services, the wellbeing of individuals is improved. This has a flow-on effect of providing an overall community-wide benefit. Individuals who are able to receive adequate support and care services are less likely to remain on the street where they might otherwise cause harm to themselves or other people in the community. The proposal is therefore consistent with the objective of the zone of demonstrating a community benefit.

## 6 CONCLUSION

The proposed use delivers a demonstrated social and community benefit by providing essential support and services for individuals affected by alcohol and other drugs, improving both individual and overall community well-being.

It is considered the proposal should be favourably determined, on individual merit, recognising the proposal provides an invaluable service to the community, and the use will be managed in such a way so as not to interfere with the amenity of the surrounding rural landholdings.

We therefore respectfully request the application for development approval be considered on its merits and favourably determined under Council discretion.

Should you have any queries or require further clarification in regard to the proposal, please do not hesitate to contact the writer.

Yours faithfully,

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**ALEXIA YACOUBIAN**  
**PLANNING CONSULTANT**