

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
TOTAL				15.7474

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.

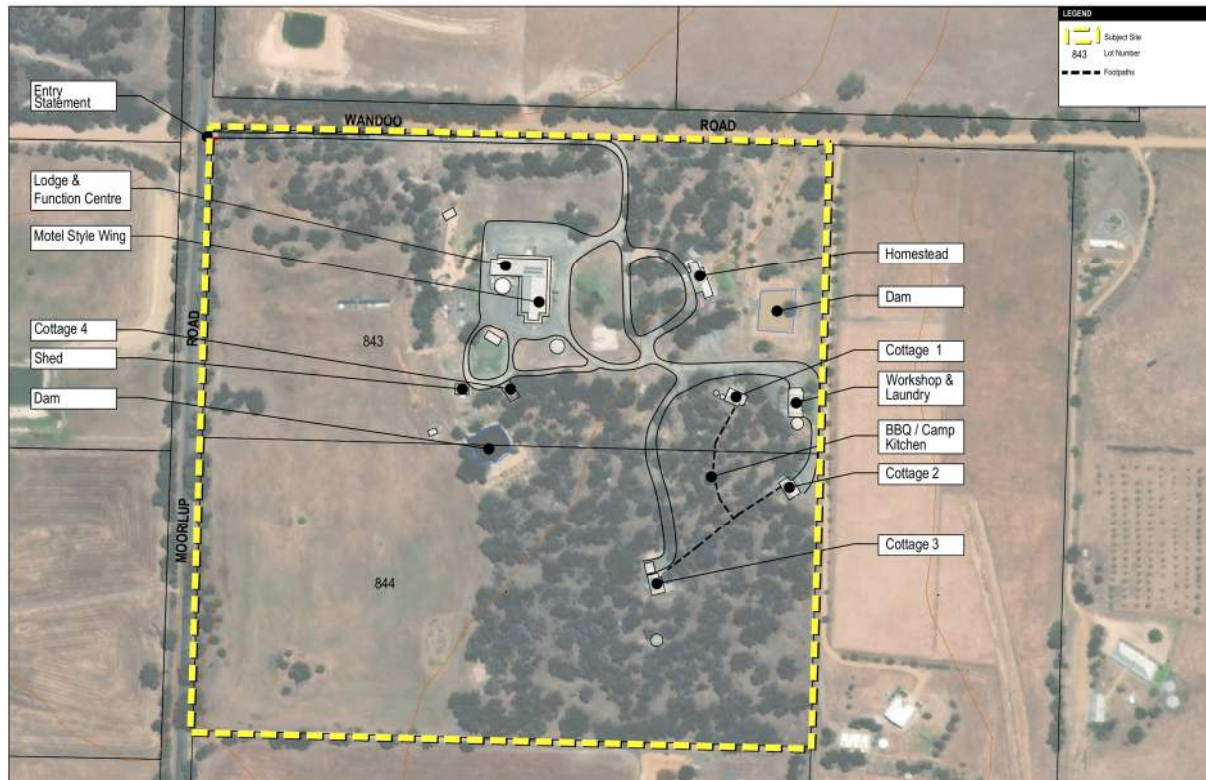


Figure 1: Site plan of the subject site’s existing conditions

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"> Commercial grade kitchen Restaurant Function Centre and adjoining conference room Office 	<ul style="list-style-type: none"> Commercial grade kitchen for resident meals Resident dining room Function centre running group programs, resident meetings, and all site meetings Reception and administration area

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

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 Section 4.1 of this application.
(c) <i>any approved State planning policy;</i>	Refer to section 4.2 of this application.
(f) <i>any policy of the State</i>	Refer to Section 5 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"> (i) <i>environmental impacts of the development;</i> (ii) <i>the character of the locality;</i> (iii) <i>social impacts of the development;</i> 	<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"> (i) <i>the proposed means of access to and egress from the site; and</i> (ii) <i>arrangements for the loading, unloading, manoeuvring and parking of vehicles;</i> 	<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.

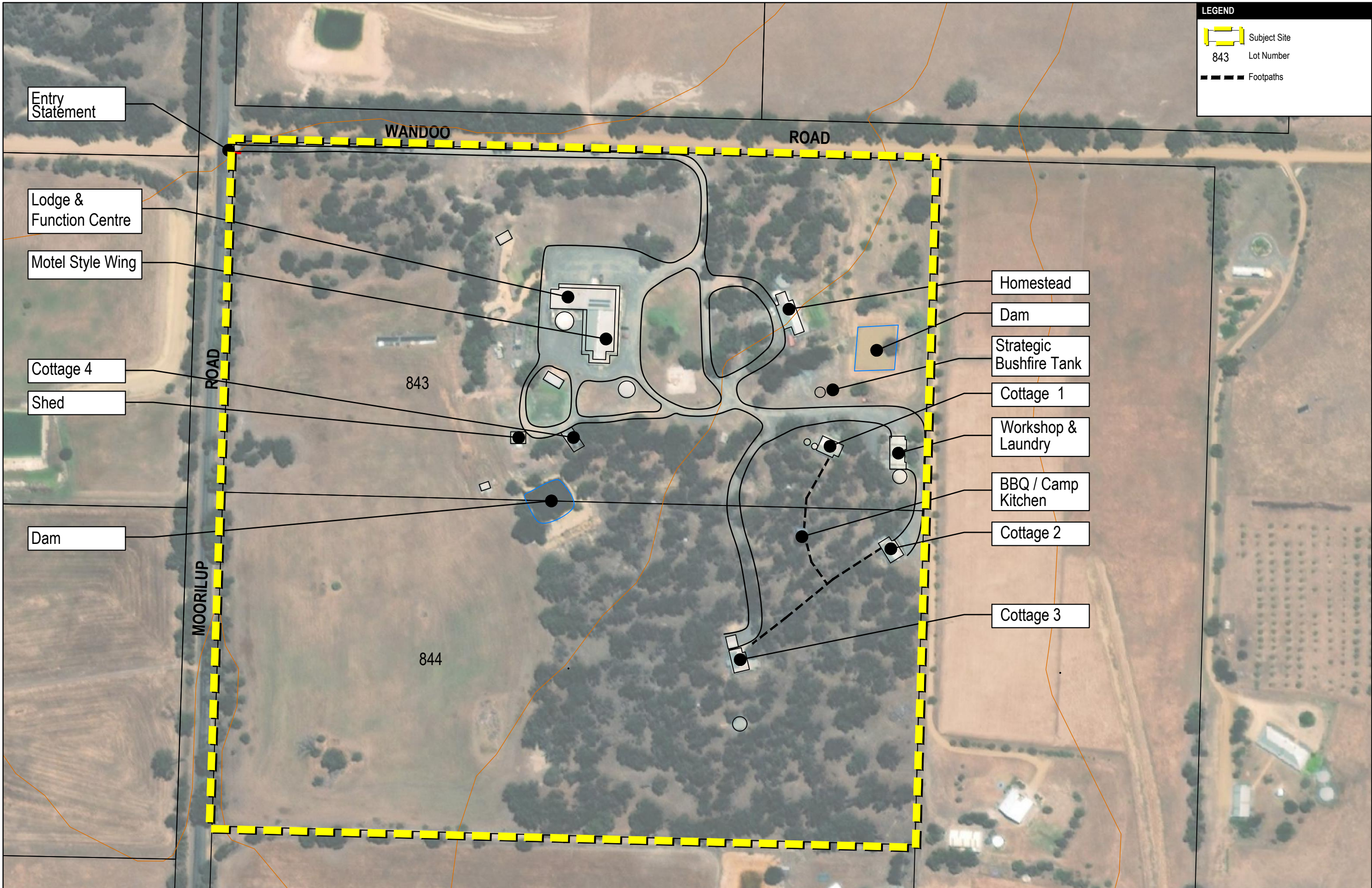
Should you have any queries or require further clarification in regard to the proposal, please do not hesitate to contact the writer.

Yours faithfully,

ALEXIA YACoubIAN
PLANNING CONSULTANT

LEGEND

-  Subject Site
- 843 Lot Number
-  Footpaths



Entry Statement

Lodge & Function Centre

Motel Style Wing

Cottage 4

Shed

Dam

Homestead

Dam

Strategic Bushfire Tank

Cottage 1

Workshop & Laundry

BBQ / Camp Kitchen

Cottage 2

Cottage 3

843

844

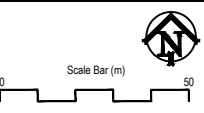
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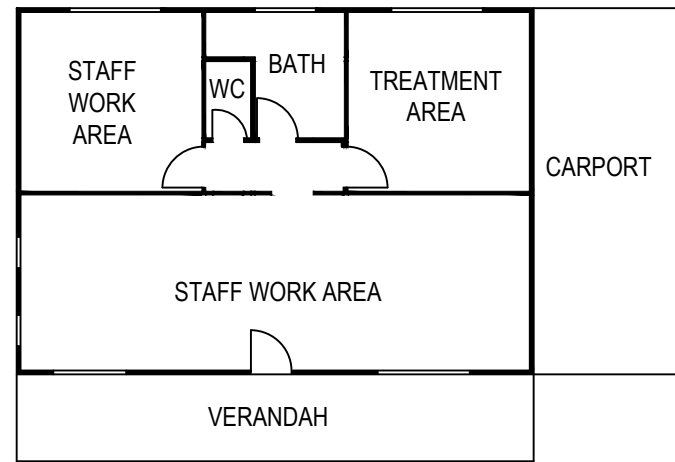
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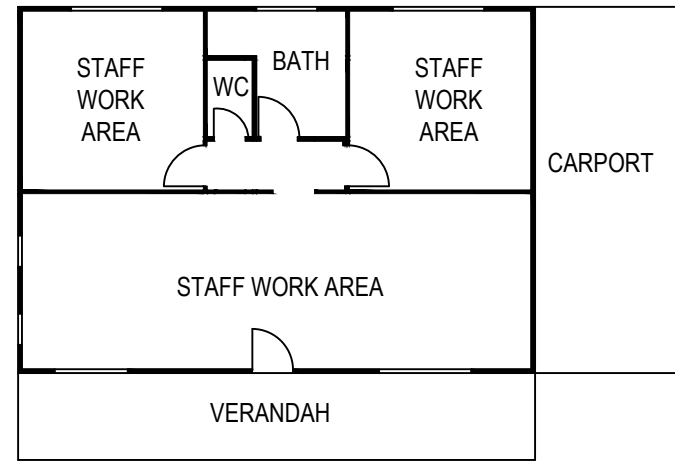


SITE PLAN
 LOT 843 (217) MOORILUP ROAD
 KENDENUP, WESTERN AUSTRALIA

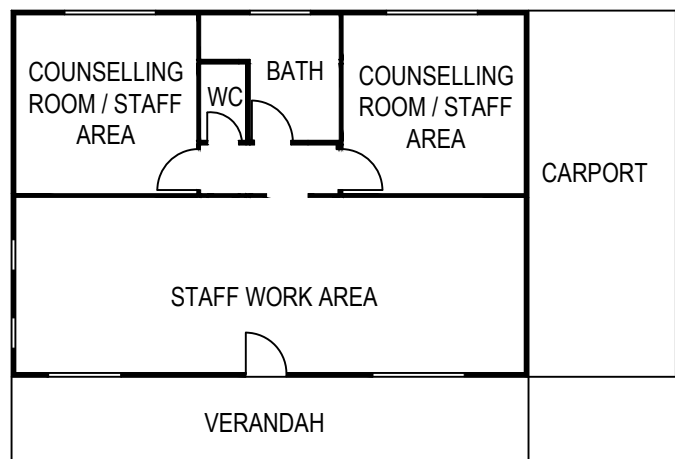
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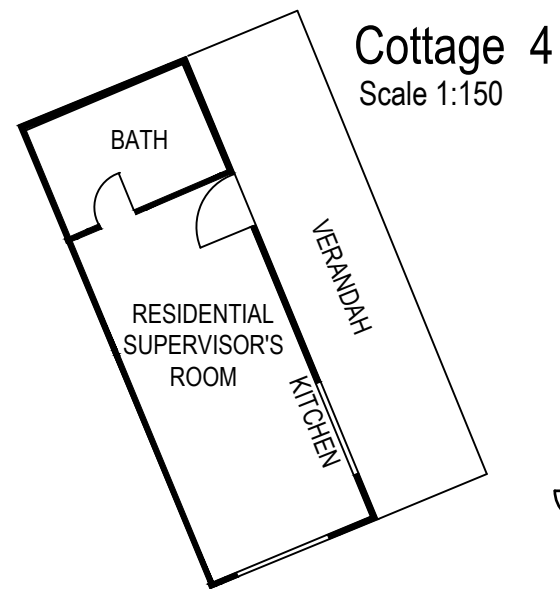
Cottage 1 Scale 1:150



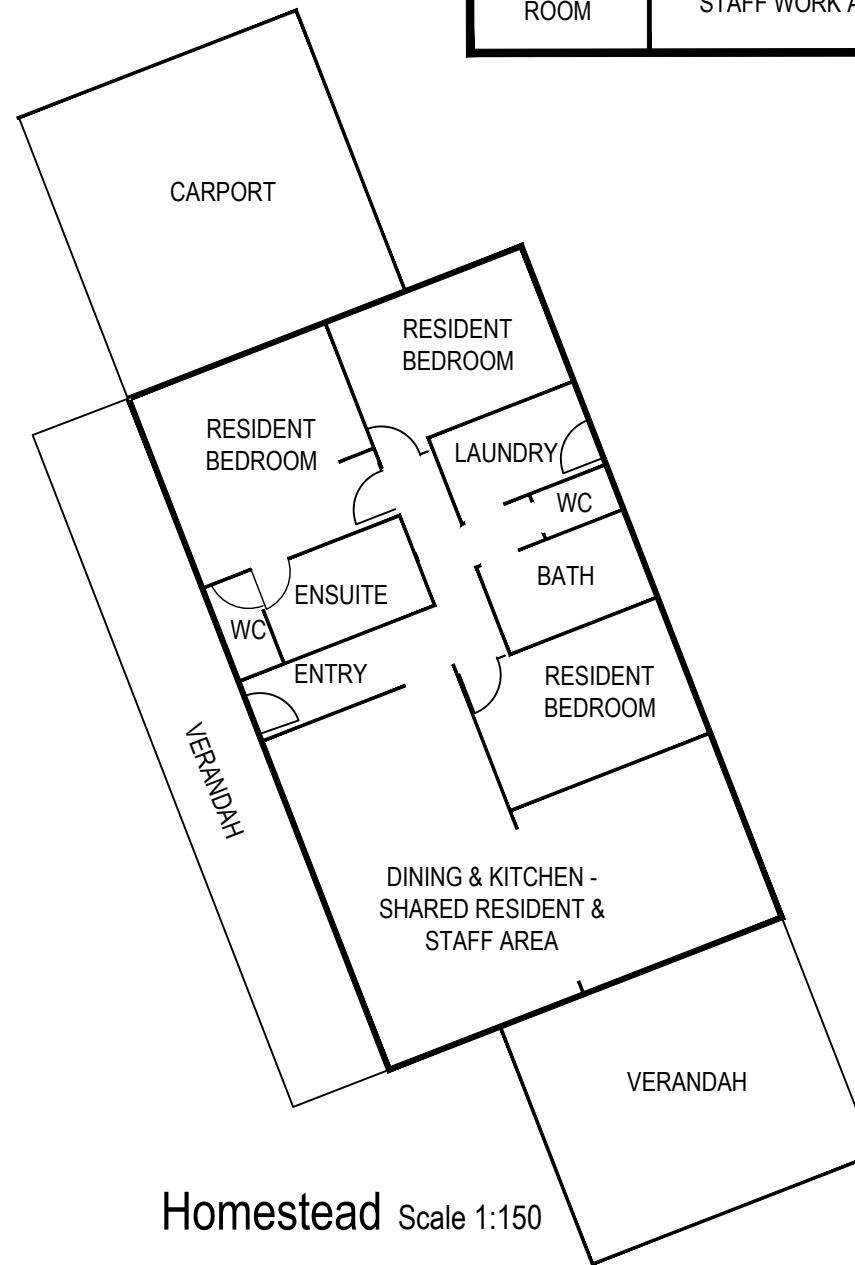
Cottage 2 Scale 1:150



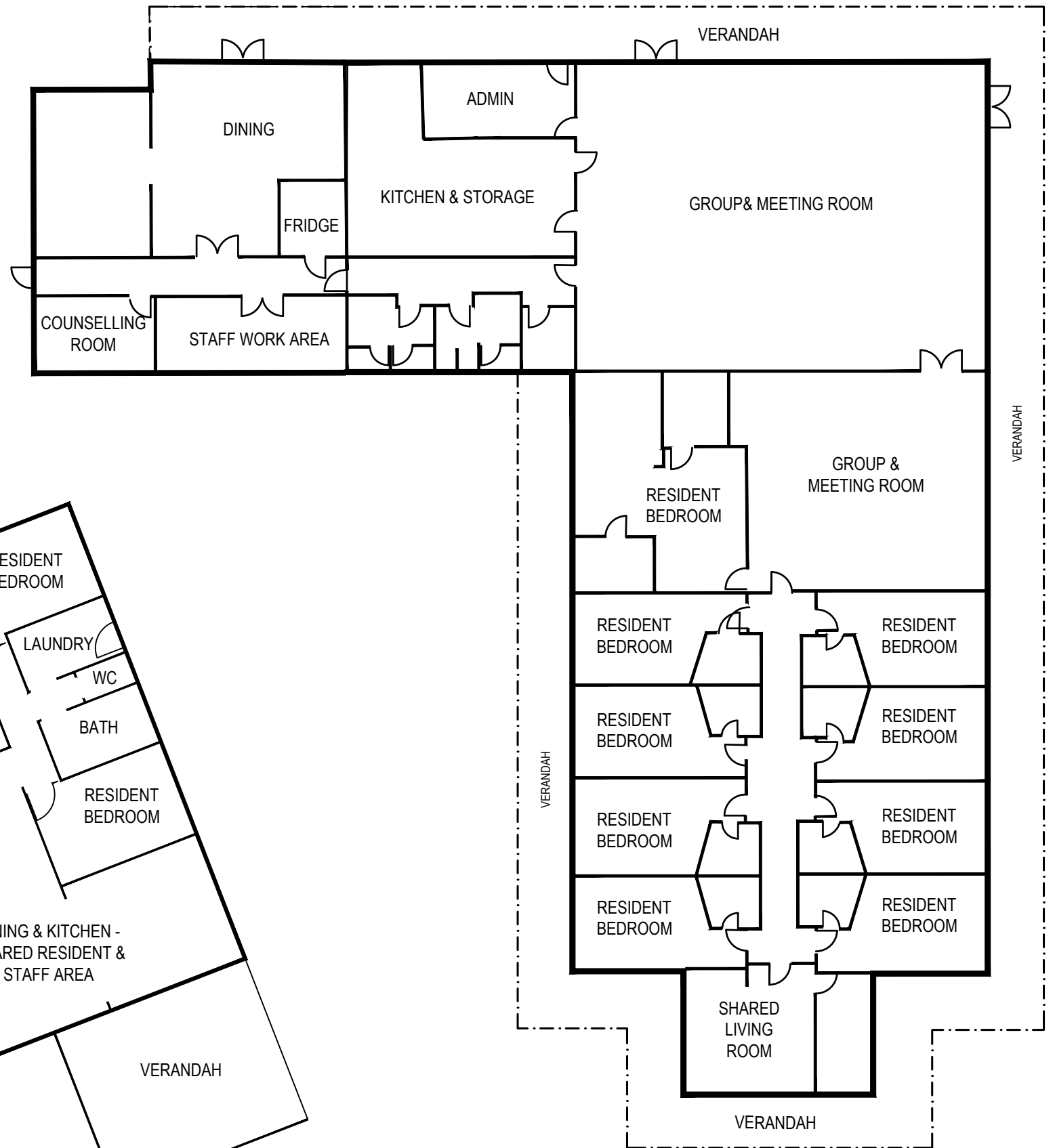
Cottage 3 Scale 1:150



Cottage 4
Scale 1:150



Homestead Scale 1:150



Lodge & Function Centre Scale 1:150



OPERATIONAL MANAGEMENT PLAN

For the Establishment of the Great Southern Drug & Alcohol Rehabilitation Centre (GSDARC)

Developed for the Shire of Plantagenet

Submitted by the Southern Aboriginal Corporation (Lead Agency) in Partnership with Cyrenian House

January 2026
To be reviewed 3-yearly

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1. Purpose and Overview

This Operational Management Plan has been developed by **Southern Aboriginal Corporation (SAC)** as the Lead Agency, in partnership with **Cyrenian House**, in support of a proposal to re-purpose **Kendenup Cottages and Lodge** at Lot 843 & 844, 217 Moorilup Road in Kendenup for use as the **Great Southern Drug and Alcohol Rehabilitation Centre (GSDARC)**.

The GSDARC will provide accommodation for up to 20 adult residents of mixed gender, Aboriginal and non-Aboriginal, accessing the following program components:

- a **Residential Rehabilitation Program** - for up to 16 adults to address their problematic alcohol and/or other drug (AOD) use
- a **Low Medical Withdrawal Unit** - for up to four (4) adults who require withdrawal.

The GSDARC is an initiative of the WA Government and is being funded via the Mental Health Commission (MHC). In the 2025 State Budget the government committed \$12.4 million to establish the first residential alcohol and other drug rehabilitation centre in the Great Southern region. The MHC subsequently released a Registration of Interest for operating the GSDARC in December 2025.

The Southern Aboriginal Corporation (SAC), in partnership with Cyrenian House, will be submitting a response to this Registration of Interest to the MHC, and will be proposing that the Kendenup Cottages and Lodge facility be re-purposed for use as the GSDARC.

SAC has been a strong advocate for the establishment of the GSDARC over many years. The need for the centre was identified through significant consultations with the Noongar community in the Great Southern, which was subsequently backed up by feasibility research and analysis, all undertaken by the Southern Aboriginal Corporation from 2016 to 2025. In addition, in 2024 SAC, in partnership with Cyrenian House submitted a concept proposal to the WA Government for the establishment of the GSDARC.

2. Service Partners

The Southern Aboriginal Corporation, as the lead agency, has formed a partnership with Cyrenian House to implement and operate the GSDARC, subject to being awarded the tender by the MHC, and subject to planning approval to utilise the current Kendenup Lodge and Cottages facility for this purpose.

In line with the WA State Government **Aboriginal Empowerment Strategy for WA 2021-**

2029¹, 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. The following is a summary of each organisation:

- **SAC** was established in 1983 and 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 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. SAC employs 37 staff who support over 1,000 people each year.
- **Cyrenian House** is the largest provider of specialist AOD treatment services in WA, 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 enter residential therapeutic communities. The capability of Cyrenian House is demonstrated through the confidence of various government agencies that have contracted with the organisation over many years 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).

Cyrenian House operates similar Residential Rehabilitation Programs and Low-Medical Withdrawal Units at the following facilities:

- **Munda Mia Therapeutic Community** (25-bed residential treatment in Kalamunda and Maida Vale)
- **Nannup Therapeutic Community** (20 bed residential treatment in Nannup)
- **Serenity Lodge Therapeutic Community** (34 bed residential treatment in Rockingham)
- **Rick Hammersley Centre Therapeutic Community Gnangara Program** (50-bed residential treatment in Cullacabardee.
- **Rick Hammersley Centre Therapeutic Community Saranna Program** (14-cottage residential treatment in Cullacabardee.
- **Midland Withdrawal and Intervention Centre** (6 bed low-medical withdrawal in Midland)

¹ The Aboriginal Empowerment Strategy – Western Australia 2021-2029. Strategy Overview
Operational Management Plan - Great Southern Drug and Alcohol Rehabilitation Centre

- **Serenity Withdrawal Unit** (4 bed low-medical withdrawal unit in Rockingham)
- **Nannup Withdrawal Unit** (3 bed low-medical withdrawal unit in Nannup)
- **Wandoo Therapeutic Community** (77-bed women's prison therapeutic community in Murdoch)

Additional local subcontracting partners will be engaged to support the delivery of the effective and comprehensive program associated with GSDARC.

3. Evidence of Need

The need for the GSDARC was formally identified by SAC in 2016, following extensive community consultation with over 200 local people regarding the cause, impact, and potential solutions for problematic AOD use in the region. Subsequent work undertaken by SAC regarding the establishment of the facility included formulation of a Business Case comprising a Cost Benefit Analysis and Preliminary Project Management Plan in 2018, and representations to WA and Federal Ministers during 2018-20. More recently during 2024-25, further developmental work has been undertaken with Cyrenian House, leading to a commitment to work together in a proposal to establish the facility, with SAC as the lead agency.

Given the clear evidence of need, Mental Health Commission's *Better Choices, Better Lives: Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025*² acknowledged the need to establish both AOD residential rehabilitation and low medical withdrawal beds in the Great Southern region. Accordingly, the recent commitment, and allocation of \$12.4 million by the WA State Government to fund the establishment of the GSDARC in the Great Southern region is welcomed and strongly supported by SAC, and partner Cyrenian House.

4. Proposed Service

4.1. Service Components

The two service components of the proposed GSDARC are outlined below:

Residential Rehabilitation Program (16 adult beds)

SAC proposes that the long-term residential rehabilitation component of the GSDARC will comprise 16 beds. The program will typically run for approximately six (6) months for each participant, with flexibility for longer stays up to 12 months, to accommodate individual progress and transitional arrangements. The facility will be operated using the *Therapeutic Community (TC) Model* and approach, in which the community itself is the principal means for promoting personal change.

² [Western Australian Mental Health, Alcohol and Other Drug Services Plan 2015-2025](#)

Low Medical Withdrawal Unit four (4) adult beds)

For some individuals, a ‘low medical withdrawal’ service will be required prior to admission to residential rehabilitation. Accordingly, the GSDARC will include a four (4) bed low-medical withdrawal service on-site, providing 24-hour care and support for residents³. A low medical withdrawal is most appropriate when the withdrawal symptoms are likely to be low to moderate, and can be managed by a Clinical Nurse, working with Support Workers and other AOD and mental health clinicians. This is distinct from ‘high medical inpatient withdrawal’, which is required for people with withdrawal symptoms that are moderate to severe, and where 24-hour supervision is required by medical staff.

The aim of low-medical withdrawal is to provide a person with short-term support and supervision for the safe discontinuation or reduction in use of a substance of dependence, managing symptoms and reducing medical complications⁴. Drawing on the experience of three other low-medical withdrawal units operated by Cyrenian House, the GSDARC low medical withdrawal unit will offer an up-to 14 day structured and individually planned withdrawal program.

4.2. Service Approach

Residential treatment services allow people to live-in whilst they receive specialist treatment, counselling and support to deal with alcohol and other drug problems. These programs are delivered in a structured and supportive environment where individuals can begin the process of recovery.

Day to day operations are structured within an established program, and generally include work therapy (grounds maintenance), individual counselling, group work (psycho-educational/process groups), food preparation, welfare appointments, access to doctors, urine screening, and recreational activities.

The 16-bed Residential Rehabilitation Program at GSDARC will operate using the **Therapeutic Community (TC) Model**. The Australian Therapeutic Community Association describes as a ‘treatment facility in which the community itself, through self-help and mutual support, is the principal means for promoting personal change⁵’. The three key elements of the TC model are:

- **Community as method** - at a TC, the community is the agent for change. The TC is

³ Alcohol and other Drug Withdrawal Management Policy – Government of WA, Department of Health (2021).

⁴ Alcohol and Other Drugs Withdrawal Management Practice and Pathways Version 2.0 October 2021 Endorsed by WATAG July 2021

⁵ Australian Therapeutic Communities Association (ATCA) [What is a Therapeutic Community? – ATCA](#)

their home. As such the resident members have input into decision making processes and participate in maintaining the facility.

- **Staged approach** - there are different stages for people living in a TC, with resident members having increased responsibilities and gaining privileges as they move through the stages. Attainment of each stage recognises increased personal awareness and growth demonstrated through behaviour, attitudes and values.
- **Holistic and multi-dimensional approach** –the TC is multi-dimensional in its approach and works with the whole person to attain best, sustainable outcomes.

Clinical staff play an integral role in delivering and supporting the above three elements, including via counselling and group interventions.

The TC Approach has a strong evidence-base⁶ and underpins the operation of many AOD residential programs in Australia and over 40 countries across the globe. All long-term residential AOD programs provided by Cyrenian House operate utilise the TC Model.

The consultations undertaken by SAC with community members has highlighted the strong need for programs offered through the GSDARC to **encompass cultural practices**, including on-country activities and connecting to cultural identity; and other programs in which the community feel safe, interested and engaged.

Accordingly, the GSDARC will offer programs to support Aboriginal people to learn from their Elders and cultural leaders about their history, culture and practices to foster a strong sense of connection and pride in cultural identity. SAC will leverage and build on its existing suite of cultural education programs and culturally informed practice to deliver a variety of educational and experiential programs, informed by local Elders and cultural leaders.

This service model is person-centred and focuses on overall lifestyle changes, as well as alcohol and/or other drug use. The aim is to assist residents in their long-term recovery from substance use, and for many, related co-occurring issues including mental health challenges, family domestic violence, and homelessness.

The service model also includes a strong focus on the development and maintenance of collaborative working partnerships with other local community service providers to ensure a holistic approach to addressing the needs of residents.

⁶ Australian Therapeutic Communities Association (ATCA) [Resources – ATCA](#)

4.3. Staffing

The management and staffing structure proposed by SAC to deliver the high quality implementation and operation of the GSDARC. The facility will be staffed 24/7 and the staffing structure will comprise a manager, clinical coordinator, a nurse, counsellors, residential support workers, as well a range of other clinical and support staff.

In order to staff the service for the required 24 hours per day, a three-shift rostering system will be employed. Staggering of shifts will occur to minimise the impact of shift changes and to ensure continuity of service and effective handover. Specifically, staffing for each of the three shifts during weekdays, after-hours and on weekends is estimated as follows:

- **Weekdays, Monday to Friday**
 - Day Shift from 7am to 7pm - up to 7 GSDARC staff on duty
 - Evening Shift from 6pm to 11pm - at least 2 GSDARC staff on duty
 - Night Shift from 11pm – 7.30am - at least 2 GSDARC staff on duty
- **Weekend Shifts**
 - Same shift structure as for weekdays above, which are covered by two Residential Supervisors at all times.
 - Visitor hours: 9am – 4pm Sundays (for approved residents only).

In addition to ensuring that there will always be at least two staff on-site during after-hours and on weekends, an **on-call arrangement** will be in place to support staff on the ground after hours. This formal arrangement means that a senior staff member from SAC or Cyrenian House will be rostered to be on-call on a rotating weekly basis. After-hours staff will always be aware of who is on-call and how they can be contacted. Staff who are rostered on-call will be contacted by phone by after-hours staff to consult with on situations requiring senior-level advice and guidance. In the event of significant issues occurring after-hour the on-call staff member will also attend the facility in person where this would assist in the management of the issue.

5. Governance and Risk Management

5.1. Partnership Governance Arrangements

If the Partners are commissioned to establish and operate the GSDARC, the responsibilities of each partner, in broad terms, will comprise:

- **SAC** – responsible for the overall leadership and operation of the GSDARC, including entering into the Service Agreement (contract) with the Mental Health Commission. SAC will be responsible for sub-contracting arrangements with other service partners.

- **Cyrenian House** - will work in partnership with SAC to support the operation of the GSDARC, with a focus on the delivery of clinical governance components to a high standard. Whilst Cyrenian House will initially operate the clinical services of the program, they will work with SAC on building their capacity and self-determination in this area.

5.2. Operational and Clinical Governance

As well-established and sustainable organisations in their own right, SAC and Cyrenian House have developed and implemented their respective suite of operational and clinical governance structures and systems that will ensure the high quality and evidence-based service delivery via the GSDARC.

SAC and Cyrenian House are both certified to deliver specialist community and health services – SAC, under the National Accreditation Scheme for Community Legal Centres; and Cyrenian House, under the Alcohol and Other Drug Human Services Standard (AODHSS), and the Standard for Therapeutic Communities and Residential Rehabilitation Services (STCRRS). Achievement of these certifications requires that the organisations' go through intensive corporate and operational audits, carried out by independent auditing bodies. For SAC and Cyrenian House, this highlights their strong commitment to transparency and accountability, and their willingness to learn from these audit processes, in pursuit of continuous quality improvement.

In addition, if SAC is selected as the provider, the operation of the GSDARC will be subject to a comprehensive range of operational and compliance conditions specified by the Mental Health Commission as the funder of the GSDARC.

5.3. Risk Management

A comprehensive Risk Management Plan which identifies risks associated with the GSDARC will underpin the effective management of risk at the facility.

SAC and Cyrenian House have a strong commitment to best practice in the management of all risks that may affect their respective organisations, specifically their clients, employees, operations, assets and reputation. Both have established robust risk management frameworks aligned to the principles of AS/NZS ISO 31000:2018 (Risk Management Guidelines).

The residents of the GSDARC will be carefully screened and selected as part of SAC and Cyrenian House's normal residential assessment process. This assessment identifies any issues such as previous sexual offending or serious violence amongst potential residents. Anyone with significant violence or any sexual offending history will be excluded from being admitted to the service.

All residents are urine tested for alcohol and other drugs multiple times per week as part of the treatment regime at the service. In addition, random drug screening, alcohol breath testing, and screening for tobacco use are conducted based on any suspicion of use.

People who complete their treatment stay will be supported to return to their homes, which in the case of the GSDARC will mostly be other towns and communities in the Great Southern region. People who need to exit the service because they have broken key rules of the program (such as using alcohol or drugs on-site) will be transported back to their home communities; either by the service; or by their family and/or friends. SAC will not approve someone to exit the service without a clear plan as to how the person will return home.

6. Facility and Location

SAC and Cyrenian House have identified the *Kendenup Cottages and Lodge* (the property) as the preferred site for the establishment of the GSDARC. The property is located at Lot 843 & 844, 217 Moorilup Road in Kendenup, within the Shire of Plantagenet. The property currently operates as a four-star holiday accommodation venue set on 40 acres of land, situated 7 km from the town of Kendenup, 17 km from Mount Barker, 67 km from Albany, and 70 km from Denmark.

SAC has made an offer to purchase the property which has been formally accepted by the current owners. The sale of the property will be completed subject to conditions including approval of funding from the Mental Health Commission and Development Approval from the Shire of Plantagenet.

This property and its location are well-suited to use as a long-term residential alcohol and other drug treatment service, and a low-medical withdrawal unit. There are many successful examples of similar services located in rural areas in Australia, including Cyrenian House's own Nannup Therapeutic Community, and Nannup Withdrawal Unit. The Nannup TC facility 23 bed facility is located on the road between Nannup and Balingup in the Southwest region and has operated successfully since 2019. Over this time, the service has operated with community support, with a positive impact on local amenity and business.

6.1. Planning considerations

SAC has contracted planning consultant *Planning Solutions* to assist with its application for Planning Approval to the Shire of Plantagenet. The application seeks approval for the Kendenup Cottages and Lodge facility to be used to deliver the GSDARC services.

In addition to Section 6.2 which describes the suitability of the site for GSDARC use, SAC and Cyrenian House have also given due consideration to the following planning and amenity related matters:

- **Traffic and parking** - the proposed site for GSDARC is currently used as a holiday stay. In its current form, the site accommodates the following:
 - 35 people in the motel style suites;
 - an additional 16 people at the Lodge and 3 chalets (assuming 4 people staying in each);
 - staff required to operate the business; and
 - the property also has event capacity of 250 persons.

The property is located on 40 acres and provides ample parking for visitors and staff to meet this requirement.

By comparison, the GSDARC will require much less parking amenity, specifically, for staff travelling to and from work (up to 7 staff during peak shifts), and any visitors associated with the operation of the centre. The 20 residents will not be allowed have their own vehicles on site, and visits from family members will be planned and scheduled to avoid excessive peaks. Accordingly, current traffic volumes are expected to reduce in the GSDARC context, associated primarily with staff shifts, visitors and deliveries.

Vehicle parking for staff and visitors will be located in the existing gravel car park situated adjacent to the current function/dining and motel facility. Parking signposts will be installed prior to operation. Parking will have no impact on the general community, as all is located within the boundaries of the property.

- **Noise and neighbourhood amenity** – as outlined in Section 4.1 which covers service components, the GSDARC residential rehabilitation program will be highly structured and based on the Therapeutic Community Model. This means that the program will focus on a safe and accountable community for residents, whereby self-help and mutual support are fostered, to promote personal change. Alcohol and other drug use will be prohibited at the GSDARC (residents will be urine tested multiple times a week to ensure compliance), and staff guidance and supervision of activities will be provided at all times, with no late night activities or events. Activity on the site will be managed to maintain amenity. In general terms, given that no alcohol will be consumed on premises, there is less likelihood of additional noise or disturbance compared to a licenced holiday rental. Residents will be required to be in their rooms with ‘lights-out’ by 10pm every night.
- **Environmental and safety considerations** – given the rural location, SAC has commissioned a bushfire management plan. Further, SAC and Cyrenian House:

- will ensure the development of a comprehensive evacuation procedure for the GSDARC, as they have done so for all the existing facilities they operate;
- will have access to existing Rangers program employed by SAC to monitor and maintain existing environment conditions; and
- will ensure compliance with relevant building, health and safety standards.

6.2. Infrastructure at Kendenup Cottages and Lodge and Potential GSDARC Use

This section provides an overview of the existing Infrastructure at Kendenup Cottages and Lodge and the potential use of the facilities for the GSDARC. As outlined in Section 4.1, the facility will need to accommodate the following uses:

- Residential Rehabilitation Program (16 adult beds)
- Low Medical Withdrawal Unit (4 adult beds)

The following table identifies existing facilities at the property (Col 1); provides a description of those existing facilities (Col 2); and describes the planned use of those facilities for the GSDARC (Col 3).

Table 1 - Existing Infrastructure at Kendenup Cottages and Lodge and Potential GSDARC Use

Existing Facilities at Kendenup Cottages and Lodge	Description of Existing Facilities	Potential GSDARC Use
Lodge and Function Centre	<ul style="list-style-type: none"> Commercial grade kitchen 	<ul style="list-style-type: none"> Commercial grade kitchen for resident meals
	<ul style="list-style-type: none"> Restaurant (40 person capacity) 	<ul style="list-style-type: none"> Resident dining room
	<ul style="list-style-type: none"> Function Centre and adjoining conference room (250 person capacity) 	<ul style="list-style-type: none"> Group programs Resident meetings All site meetings
	<ul style="list-style-type: none"> Office 	<ul style="list-style-type: none"> Reception and administration area
Motel Wing (attached to Lodge Function Centre)	<ul style="list-style-type: none"> 9 rooms (35 person capacity) <ul style="list-style-type: none"> 5 rooms - sleeps 3 persons 3 rooms - sleeps 4 persons 1 room - sleeps 8 persons Some rooms with disabled access 	<ul style="list-style-type: none"> Accommodation for 16 GSDARC residents Accommodation for 1 resident nearing completion of their low medical withdrawal program)
	<ul style="list-style-type: none"> Fully equipped kitchen 	<ul style="list-style-type: none"> Residents use
Homestead with 3 bedrooms	<ul style="list-style-type: none"> Large self-contained home 3 bedrooms, bathroom, dining, living areas 	<ul style="list-style-type: none"> Low Medical Withdrawal Unit providing accommodation for 3 (of the 4 places required) for low-medical withdrawal residents Accommodation for a fourth low medical withdrawal unit resident will be provided in the Motel Wing (as outlined above)
Cottage # 1 (of 4) – 2 bedrooms	<ul style="list-style-type: none"> 2 large bedrooms Fully self-contained with kitchen bathroom, dining and lounge 	<ul style="list-style-type: none"> Staff offices and treatment room for low-medical withdrawal unit

Existing Facilities at Kendenup Cottages and Lodge	Description of Existing Facilities	Potential GSDARC Use
Cottage # 2 (of 4) – 2 bedrooms	<ul style="list-style-type: none"> • 2 large bedrooms • Fully self-contained with kitchen bathroom, dining and lounge 	<ul style="list-style-type: none"> • Staff area and offices for TC program
Cottage # 3 (of 4) – 2 bedrooms	<ul style="list-style-type: none"> • 2 large bedrooms • Fully self-contained with kitchen bathroom, dining and lounge 	<ul style="list-style-type: none"> • Counselling/treatment room (s) • Staff room
Cottage # 4 (of 4) – 1 bedroom	<ul style="list-style-type: none"> • 1 bedroom cottage 	<ul style="list-style-type: none"> • Residential Supervisor (staff) overnight accommodation
Laundry	<ul style="list-style-type: none"> • Separate laundry 	<ul style="list-style-type: none"> • Resident use
Workshop	<ul style="list-style-type: none"> • Large workshop located near the perimeter of the property 	<ul style="list-style-type: none"> • Resident and staff workshop area • Manual works program delivery • Storage of equipment and materials
Vegetable garden and orchard	<ul style="list-style-type: none"> • Growing produce 	<ul style="list-style-type: none"> • Resident gardening programs • Source for produce
Large, landscaped area	<ul style="list-style-type: none"> • Suitable for outdoor gatherings 	<ul style="list-style-type: none"> • Outdoor programs • Cultural activities • Leisure area for residents
Camp Kitchens; outdoor BBQ and pizza areas x3	<ul style="list-style-type: none"> • Outdoor cooking and dining 	<ul style="list-style-type: none"> • Resident cooking and dining • Cultural activities • Leisure area for residents
Children Play Area	<ul style="list-style-type: none"> • Well-equipped playground 	<ul style="list-style-type: none"> • Family visits
2 Dams	<ul style="list-style-type: none"> • Water source for the property 	<ul style="list-style-type: none"> • Water source for the property

Diagram 1 - Kendenup Cottages and Lodge Showing Main Facilities



The property is equipped with quality internal roads; underground power on site; water supply via rainwater tanks for each building and two dams, with all cottages connected underground for the transference of water; air-conditioning; solar and instant hot water systems; 24 solar panels; TV and Internet access; and ample car parking.

Whilst the property is considered to be in good condition and highly suitable for GSDARC use, some minor capital works will be required.. The aerial view of the property on the previous page shows the location of the main facilities as identified in column 1 of the previous table.

7. Implementation Plan

SAC has developed a detailed Project Implementation Plan for the GSDARC, should SAC be the successful tender applicant. The Plan proposes that the GSDARC can be implemented with a lead time of three (3) months from Contract Award and is based on the following assumptions:

- Mental Health Commission Service Agreement to implement and deliver the GSDARC is awarded on or before 1/07/2026.
- Purchase of the Kendenup Cottages and Lodge by SAC, the preferred site for the GSDARC, is completed by mid-July 2026.

Based on these assumptions, the GSDARC could commence operation as early as October 2026.

8. Local Community Engagement

SAC and Cyrenian House are strongly committed to building and maintaining positive relationships with the Kendenup and surrounding communities.

In transitioning the function of the Kendenup property, SAC and Cyrenian House commit to maintaining engagement with local suppliers and services used by the current owners.

A key focus will be to provide community members with opportunities to obtain information, ask questions and express any concerns. SAC will facilitate this via engagement strategies that include, but are not limited to:

- Access to a designated community liaison representative, a senior member of the SAC/Cyrenian House team, to whom enquiries can be made – this is key to ensuring that community concerns can be raised, addressed and monitored.
- Individual and community meeting/s.
- Written information, including a Frequently Asked Questions (FAQ) brochure.
- Information on the SAC website.

- Access to SAC's formal complaints process.

The designated SAC community liaison representative will provide regular updates on any issues raised and outcomes, to the joint SAC / Cyrenian House **GSDARC Leadership Committee**, a key governance mechanism responsible for providing overarching oversight for implementation and operation of the GSDARC. The Leadership Committee will comprise senior leaders from both SAC and Cyrenian House. Other governance mechanisms in place to support the resolution of any issues raised by the community include:

- **GSDARC Operations Committee** - responsible for the day to day operation of the service
- **Aboriginal Advisory Committee** – responsible for providing advice on cultural aspects of the service.

9. Complaints Management

In the event that issues cannot be resolved, local residents will have the opportunity to lodge a complaint directly to SAC. The existing complaints process implemented by SAC is well-developed and local residents will be able to lodge a complaint by:

- Reporting an issue by contacting the designated SAC/Cyrenian House community liaison representative or the Manager of the GSDARC - the aim of this interaction will be to respond to, and resolve the issue as soon as possible
- If after this initial contact the local resident is not satisfied the issue has been appropriately responded to, they will be given to opportunity to make a formal complaint.
- The complaint will then be managed responsibly as per the SAC Complaints Policy.

If the person making the complaint is not satisfied with the outcome of the SAC response, they will have the opportunity to refer their complaint to an external body, in line with the provisions of SAC's Complaints Policy.

10. Addressing Potential Concerns

This section identifies and addresses potential concerns that may arise from the proposal to establish the GSDARC, from community members living in Kendenup, Mount Barker and surrounding districts. These issues fall into two broad categories:

- Community safety
- Impact on local services

In addition to the information provided in this section, SAC has also developed responses to a series of **Frequently Asked Questions (FAQ)** to address potential

queries that community members may have about the proposed use of the centre (refer to section 11).

10.1. Community Safety

Type of resident

Residents assessed as suitable for the service will not have a history of sexual offending, or serious violence. Evidence of such offending will disqualify that person from accessing the service. This rule is already in place at Cyrenian House's other residential treatment centres and has been for many years. As a result, there has never been a single significant violent or sexual offence at any Cyrenian House residential facility, over the almost 45 years the organisation has operated.

Residents assessed for the service are screened and prepared to ensure that they have demonstrated a serious commitment to their recovery.

Across Cyrenian House's other services the proportion of people with methamphetamine as their presenting problem is approximately 40%. The most prevalent presenting drug issue seen across its services is alcohol. It is therefore likely the people with alcohol problems, along with people with methamphetamine, and/or cannabis problems will comprise the majority of residents.

In summary, people accessing the service will be there for a range of reasons and will have problems with different types of alcohol and other drugs. What they will have in common is **a strong commitment to their recovery, turning their lives around, and starting a new life as a productive and ethical member of society**. Residents will be fully supervised by professional and trained staff on a 24/7 basis. In addition to having properly trained after-hours staff, there will also be senior staff on call to support the night staff if required.

Security and fencing

Secure fencing is not a feature of existing AOD residential services, except in prison environments. However, SAC does intend to properly fence the facility to provide clarity to staff, residents and the local community about the boundaries of the facility.

People who are there pose no risk to community and are committed to their recovery, which includes a commitment to remain on the grounds of the facility unless an excursion is planned as part of their treatment.

Exit (discharge) or residents from the facility

People who complete their treatment stay will be supported to return to their homes, which in the case of the GSDARC will mostly be other towns and communities in the Great Southern region. People who need to exit the service because they have broken key rules of the program (such as using alcohol or drugs on-site) will be transported

back to their home communities; either by the service; or by their family and/or friends. SAC will not approve someone to exit the service without a clear plan as to how the person will return home.

Visitors

Visitors to other AOD residential facilities operated by Cyrenian House are extremely well behaved and this is also expected to be the case with the GSDARC.

After an initial period of orientation to the service, residents will be allowed to have visitors at the service. However, these visits need to be planned and approved by staff at the service. Only visitors that are close family, or significant others that are also fully committed to the person's recovery and abstinence from alcohol and other drugs will be approved as visitors. All visitors to the service must agree to comply with rules that support the recovery of the person in treatment, the safety of residents and staff, and which respect the local community.

In summary, the experience of visitors to the service and town will be of loved ones, grateful for the service being provided, and who are there to show support and encouragement.

The experience of neighbours elsewhere

Relationships with neighbours and the local community are extremely important to SAC and Cyrenian House. SAC currently manages a portfolio of 79 homes as part of its community housing program (64 owned by SAC), and the success of this program is built on engaging with and maintaining positive relationships with local communities. Similarly, SAC's Rangers Program works closely with local communities, through the Aboriginal Rangers they employ who support conservation and environmental restoration in national parks.

Cyrenian House places the same priority on maintaining positive relationships within the local communities in which it operates. SAC and Cyrenian House are very confident that given the opportunity, they will over time be accepted as important and positive members of Kendenup and surrounding communities. Evidence for this can be found in the experience of neighbours at other services, as demonstrated through the following example:

Cyrenian House's closest neighbour at its large head office and service facility in Fitzgerald Street Perth, is an accountant by the name of Mr Bill W Dunstan. When Cyrenian House proposed purchasing the property at 318 Fitzgerald Street Mr Dunstan vehemently opposed the sale and 'Change of Use' application on the basis that clients of the service would create safety issues for himself and other neighbours. Fourteen years later Mr Dunstan is still operating his accountancy practice next door to Cyrenian House. His

views about the organisation have also changed, to the extent that Mr Dunstan provided a letter in support of the 'Change of Use' application to the Shire of Manjimup when the Nannup Therapeutic Community was established in 2019.

10.2. Impact on Local Services

Policing

SAC is aware that there may be concern that the proposed GSDARC will impact on local Police. SAC and Cyrenian House are confident that the service will have an insignificant or nil impact on the workload of local Police.

During the many years that Cyrenian House has operated the 64-bed Rick Hammersley Centre in Cullacabardee, there have been very few (averaging less than one call out per year) because of a disturbance at the property. The same trend holds true for the 38 bed Serenity Lodge service operated by Cyrenian House for the past 14 years, and the same is also true for the Nannup Therapeutic Community that has operated since 2019.

For Serenity Lodge, Cyrenian House records show that only one Police call out has occurred in this period, and this was the result of passing motorist colliding with a wall on the property – not the result of any actions of residents or staff.

To ensure that SAC plans for the GSDARC are understood by Police, SAC and Cyrenian House intend to engage with the District Superintendent. The experience of Cyrenian House as a major provider of AOD treatment services is that Police are aware of the individual and community benefits derived from such programs.

General Practitioners, Hospitals and Ambulance Services

SAC is aware that access to GP services in Kendenup and surrounding districts is limited. Given the partners experience at other AOD residential services, it is anticipated that approximately a total of 4-5 appointments on average per fortnight will be required by the service. This is not expected to be substantially higher than any member of the public accessing a GP for general health issues.

The GSDARC will have a nurse on site and will have on-call staff and other arrangements in the event of an emergency at the centre. In addition, all GSDARC staff will be required to hold a current First Aid Certificate.

SAC also has a well-established network of health providers in the Great Southern region with whom they work, who may also provide support in relation to resident health needs.

Residents accessing the GSDARC are not expected to have a physical health status profile necessitating hospital care at a rate any higher than that of the general population while a resident at the service.

Accordingly, whilst health service requirements for GSDARC residents are expected to be comparable to any other member of the community, support options will be established with local health services across Mount Barker, Denmark or Albany.

Mount Barker is the closest town to the GSDARC location (17 km drive) and provides access to both GP and hospital services (24/7) through the *Plantagenet Medical Centre* and *Plantagenet Cranbrook Health Service*, respectively. When needed, SAC staff will drive the residents' needing appointments to the most relevant service. In rare critical cases, an Ambulance may be required. Depending on the nature of the emergency, SAC will also have in place its own arrangements for transporting residents to hospital should the need arise.

Mental health

People with alcohol and other drug problems may also present with mental health conditions. Most typically, this is likely to be high prevalence disorders such as depression and/or anxiety. In most of cases these mental health issues will be managed by GSDARC clinical staff, with support for medication from a prescribing doctor, where required. People with more severe forms of mental illness such as schizophrenia will not be suitable for admission to the GSDARC unless they are stable and able to effectively participate in the program.

SAC also has established working relationships with key mental health service providers including the following which can provide support for residents in some situations:

- Amity Health
- Great Southern Aboriginal Health Association
- WA Country Health Service (Albany Health Campus, Plantagenet Cranbrook Health Service)
- Headspace Albany.

11. Positive Impacts for the Community

An examination of the literature highlights positive outcomes when evaluating the impact and effectiveness of residential rehabilitation programs. In 2023, the National

Indigenous Australians Agency supported research⁷ which concluded that the overall BCR (Benefit Cost Ratio) of Aboriginal residential rehabilitation services is 1.29, which suggests that every dollar invested in Aboriginal residential rehabilitation services will obtain an estimated \$1.29 return.

The expected benefits to the community from the establishment of the GSDARC include:

- **Health Benefits** – savings in health costs including medical services, hospitals, nursing homes, pharmaceuticals and ambulances could be expected as a result of rehabilitation.
- **Improved life expectancy** - the benefits of improved life expectancy from drug rehabilitation have been calculated from data on causes of death in Australia, published by the Australian Bureau of Statistics.
- **Benefit in the protection of Aboriginal culture** - SAC consultations amplified community concerns that problematic AOD use was a threat to Aboriginal communities and their cultures. A focus on culture will foster knowledge and experience of Aboriginal Culture, thereby positively impacting its preservation.
- **Savings in Police, Justice and Detention expenditure** – the increase in pro-social behaviour through rehabilitation and recovery will reduce the draw on Police and Justice services. Related to this is an expected reduction in the costs and other negative impacts associated with crime.
- **Improved worker productivity** – it is expected there will be enhanced capacity of residents to regain a place in the workforce following their treatment program.

From an economic perspective, the establishment of the GSDARC will bring significant cost savings to the State. This takes into account savings in health costs, justice and other government services, as well as increased work production and life expectancy.

In addition to the above, it should be highlighted that the GSDARC will bring new employment opportunities into the Great Southern region, as SAC will seek to employ local people to fill the jobs at the facility. In addition, SAC intends to ‘purchase local’ for the supplies needed to operate the GSDARC. This focus on accessing local people and resources will bring significant economic and social benefits to Kendenup and

⁷ Commonwealth of Australia, National Indigenous Australians Agency, Strengthening the Evidence Base for Aboriginal Alcohol and other Drug Residential Rehabilitation Services. [strengthening the evidence base for aboriginal alcohol and other drug residential rehabilitation services](#)

surrounding districts. It is estimated that the establishment of the service will result in a \$2.5 to \$3 million annually in additional income to the economy of the region.

12. Frequently Asked Questions (FAQ)

The following FAQ resource has been developed by SAC and partner Cyrenian House for the benefit of local community members and other stakeholders in Kendenup and surrounding districts.

How many residents will the service accommodate at any one time?

The GSDARC will provide 16 adult beds for long-term alcohol and other drug treatment and 4 adult beds for low medical withdrawal. This would mean that there would be a maximum of 20 people accommodated at the facility at any one time.

How are people assessed for admission to the proposed service?

Potential residents will be assessed by the SAC / Cyrenian House Residential Pathways team member, using the comprehensive assessment and preparation process in place for Cyrenian House's other Therapeutic Communities. Assessments will be conducted in the Great Southern region at various locations, remotely via teleconference or video-link where necessary, and in Perth.

What sort of people will be treated at the GSDARC service?

Residents at the service will be Western Australian adults (over 18 years), who have alcohol and other drug related issues that require residential treatment. People assessed as suitable for admission will be highly motivated and committed to their recovery and to an alcohol and drug free life and future.

When will the service commence operation?

The project plan for the development of the service has the service commencing as early as late 2026. This date is subject to the successful outcome of an expected State Government tender process and Shire approvals coming within expected timeframes. SAC and Cyrenian House are confident they can establish the service quickly and efficiently based on their experience at establishing similar services over recent years.

What sort of activities or programs do residents participate in?

Each day is full, and highly structured with little opportunity for idleness. The treatment program consists of an intensive daily program of work, recreation and psychosocial therapies. Residents are responsible for supporting the effective and efficient running of the facility alongside staff, undergo counselling in groups and individually, have their health monitored, learn new skills, and are assisted to plan for their future.

What do residents learn while they reside at the service?

The treatment model emphasises the importance of working and giving back to the community and other people as a pathway to a healthy fulfilling life. Residents are required to work hard and are consistently challenged to identify and address old and negative patterns of interacting with others and general behaviour. One of the key aspects of the program is that those residents ‘further along’ in their treatment are responsible for mentoring new residents to help them adjust the highly structured way of life in the service and to provide guidance and role modelling.

Will the service be like other alcohol and other drug residential services?

The service will be a ‘best practice’ example of residential alcohol and other drug treatment. It will operate using the Therapeutic Community Model. This is considered the gold-standard residential treatment approach in use today around the world.

What quality assurance will be in place?

The service will meet all State and Local Government requirements including quality accreditation, appropriate registration and contractual funding requirements of the State Government. SAC’s service delivery partner Cyrenian House already operates four other government funded community-based Therapeutic Communities in Western Australia and is considered the leading provider of these services in WA and has an excellent reputation both Australia-wide and internationally.

What qualifications will the staff have?

Staff will be well qualified and trained for their roles at the service. The manager of the GSDARC will be required to be a tertiary qualified professional – either a psychologist, social worker, nurse or similar. The counsellors at the service will also require relevant formal qualifications. A Registered Nurse will also be based at the service to provide medical expertise and supervision to people in the early phase of their recovery. Other support staff including general support workers, and evening/night supervisors will come with a variety of qualifications and experience. In all cases staff will be trained for and skilled at the jobs they are recruited for.

Will there be opportunities for local people to be employed at the service?

Local people will be employed at the facility. SAC will undertake an open recruitment process for staff at the service and will encourage appropriately qualified local residents to apply. A significant number of permanent and casual jobs will be created by the GSDARC, with a high likelihood that these staff and their families will live in or around Kendenup, Mount Barker, Denmark, Albany and other towns in the region.

How will the safety of the Kendenup community be guaranteed?

Safety will be the number one priority at the facility. The residents of the GSDARC will be carefully screened and selected as part of SAC and Cyrenian House’s normal residential assessment process. This assessment identifies any issues such as previous

Operational Management Plan - Great Southern Drug and Alcohol Rehabilitation Centre

sexual offending or serious violence amongst potential residents. Anyone with significant violence or any sexual offending history is excluded from being admitted to the service. There has never been a single significant violent or sexual offence at any Cyrenian House residential facility, over the almost 45 years the organisation has operated.

Are residents detained at the service?

No. All residents will be voluntarily undertaking treatment at the service. No person will be required to participate in the treatment program against their will.

How will residents get to the service?

It will vary. Most people will be transported to the service by family or friends. Where this is not possible, SAC will facilitate the transport of clients who do not have other options for transport.

Will family and friends be able to visit residents during their treatment?

Yes, but only as agreed and after a period of orientation. People who first enter the centre will be required not to have visitors except under exceptional circumstances during the first four weeks of their stay. This allows people to completely adjust to life in the community and to begin to focus on their recovery without distractions. After this period is over visits are encouraged. It is anticipated that as the service develops that parents, siblings and other family members will travel to Kendenup to visit family members in treatment. Visitors requiring accommodation will need to make their own arrangements with local accommodation/tourist providers. This steady flow of visitors is likely to have some modest impact on tourist and visitor numbers to the town.

What sort of supervision is provided to residents at the service?

The service will be staffed 24/7 and at no time will residents be left unsupervised. During weekdays business hours there will be 5-7 staff on duty for the up to 20 residents accommodated. During evenings/nights and on the weekends, there will always be at least two (2) paid staff members on duty at the facility. In addition, after hours there will always be a senior Cyrenian House or SAC staff member formally “on-call”, available by phone to consult with staff on-site about any situations or decisions requiring senior-level input.

How long will residents stay at the service?

Residents typically complete their treatment successfully in approximately six to seven months although flexibility is provided for longer stays up to 12 months, to accommodate individual progress and transitional arrangements. A minority of people do stay for a few days or weeks only, but this is usually when they decide to end their treatment early or need to be discharged by the service. .

Will residents be allowed off the grounds and be able to come to town?

Yes, but under supervision as appropriate. As people progress in treatment, they are required to take on more responsibility. An example of this is the weekly shopping. In this example a small group of residents accompanied by staff would drive to Kendenup or Mount Barker to purchase supplies for the coming week. Another example would be residents engaged in a planned recreational activity such as bushwalking or sports.

Will the service contribute to the local community and economy?

Yes. The service will employ local residents, and SAC is committed to purchasing the goods and services required to run and maintain the service from local businesses as per current arrangements. It is expected that between \$2.5-3 million annually of revenue will flow to local residents and businesses as a direct result of the addition of this service.

What happens when someone finishes treatment, or they must be exited for breaking the rules?

People who complete their treatment stay are supported to return to their homes, which in the case of the GSDARC will mostly be other towns and communities in the Great Southern region. People who need to exit the service because they have broken key rules of the program will be transported back to their home communities; either by the service; or by their family and/or friends. SAC will not approve someone to exit the service without a clear plan as to how the person will return home.

What happens if someone at the service uses alcohol or other drugs while resident at the service?

One of the “Golden Rules” of the Therapeutic Community Model states that alcohol or other drug use is not acceptable to the community. This means that the person will be discharged from the service as soon as is practical; while still ensuring their safety and confirming a plan for them to return home. In practice people are usually exited within 24 hours of the discovery of alcohol and/or other drug use.

How do you know if someone has been using drug or alcohol on the site?

All residents are urine tested for alcohol and other drugs multiple times per week as part of the treatment regime at the service. In addition, random drug screening, alcohol breath testing, and screening for tobacco use are conducted based on any suspicion of use. SAC is confident based on Cyrenian House’s experience operating similar services for over 40 years that the GSDARC will likely be one of the most drug, alcohol and other drug (including tobacco) free properties of any kind in the entire Great Southern.

END



Prepared by:

Southern Aboriginal Corporation (Lead Agency) and partner, Cyrenian House
© January 2026

BUSHFIRE MANAGEMENT PLAN



Southern Aboriginal Corporation

Lot 843 No 217 and Lot 844 No 197 Moorilup Road
Kendenup

DRAFT V2

26/02/2026



Site Details					
Address:	Lot 843 (No 217) and Lot 844 No 197 Moorilup Road				
Suburb:	Kendenup	State:	W.A.	Postcode	6323
Local Government Area:	Shire of Plantagenet				
Description of Building Works:	New Great Southern Drug and Alcohol Rehabilitation Centre				
Stage of WAPC Planning:	Development Application				

Bushfire Management Plan Details			
Report / Job Number:	MSC0772	Report Version:	Draft V2
Assessment Date:	11 December 2025	Report Date:	26 February 2026
BPAD Practitioner:	Kathryn Kinnear (Level 2)	Accreditation No.	BPAD-30794
BPAD Practitioner:	Jason Benson (Level 2)	Accreditation No.	BPAD-37893
BPAD Practitioner:	Daniel Panickar (Level 3)	Accreditation No.	BPAD-37802



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1. Introduction

Southern Aboriginal Corporation (SAC) commissioned Bio Diverse Solutions (Bushfire Consultants) to prepare a Bushfire Management Plan (BMP) to support the Development Application (DA) of the Great Southern Drug and Alcohol Rehabilitation Centre (GSDARC), at Lots 843 (217) and 844 (197) Moorilup Road, Kendenup, within the Shire of Plantagenet (SoP). This BMP has been prepared to assess the Subject Site against the current and the State Planning Policy (SPP) 3.7 Bushfire (WAPC, 2024a) and endorsed Planning for Bushfire Guidelines (WAPC, 2024b).

The Subject Site (Lots 843 (217) and 844 (197) Moorilup Road, Kendenup) is currently being used as the Kendenup Cottages and Lodge, which has 4 self-contained cottages, an existing 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 250 people, and a bar/restaurant. The existing land uses are described as 'Tourist Development' and 'Reception Centre', the latter being a non-conforming use. There are a total of 6 habitable buildings present on site.

SAC are lodging a change of use application with the SoP to allow for a 'Community Purpose' (also non-conforming use) on the site. The application is for a change of use from one non-conforming use to another non-conforming use. No external works are proposed on the six buildings. The Development proposal is to 'repurpose' the existing structures for use as the Great Southern Drug and Alcohol Rehabilitation Centre (GSDARC).

The BAL Assessment has been prepared to assess the site for bushfire risk under SPP 3.7, with the implementation of site Asset Protection Zone works to ensure an allocation of BAL-29 to BAL-12.5 prevails over the existing buildings indicating there is a risk of radiant heat and ember attack on the buildings (AS3959, 2018). The existing residence will have a 20m APZ applicable commensurate with the SoP Bush Fire Mitigation Notice (2025/26). There is no external building construction proposed and as such proposal satisfies the acceptable solutions of the *Bushfire Protection Criteria (BPC) 8: Development - Vulnerable Class 9 Buildings*, Element 2: Siting and Design (WAPC, 2024b), by ensuring that each building includes sufficient space to achieve a radiant heat impact of no more than 29 kW/m² (BAL-29). As demonstrated in Section 3 of this BMP report. The proposal has been assessed against the BPC *Criteria 8 as Vulnerable Land Use*, noting the proposed use (drug and alcohol rehabilitation) is not "Tourism" and is a "Vulnerable commercial proposal" with overnight stay (as defined in the Bushfire Guidelines, WAPC, 2024b). All buildings are classified by the building surveyor as Class 3 or Class 1a (existing residence) buildings under the National Construction Code (NCC).

There is an exemption for internal building work in bushfire-prone areas is primarily governed by Regulation 31BA of the Building Regulations 2012 (WA). Under this regulation, internal-only fit-outs or renovations in existing residential buildings (Classes 1, 2, or 3) are typically classified as "excluded building work" and are exempt from NCC bushfire performance requirements if they meet specific criteria.

This BMP has been prepared to assess the proposal against the current and endorsed SPP 3.7 and Guidelines, with site-specific recommendations to support bushfire resilience. The BMP has been prepared by a Level 2 accredited bushfire practitioner and peer reviewed by a BPAD Level 3 practitioner (Appendix C). The GSDARC will provide accommodation up to 20 residents, 7 rostered staff on duty during weekdays business hours, and at least 2 staff on duty during evenings/nights and on the weekends. The Bushfire Emergency Plan (BEP) will be prepared as part of the DA conditions and will be implemented prior to occupation of the building. Evacuation information is to be provided in the BEP, which outlines procedures for managing occupants during a bushfire emergency. The BEP will align with the Guide to Developing a Bushfire Emergency Plan (WAPC, 2024c) and forwarded to the Shire for approval.

1.1 Location

The Subject Site is described as Lots 843 (217) and 844 (197) Moorilup Road, Kendenup, within the SoP. Lot 843 (No 217) is approximately 80633.614m² in size, Lot 844 (217) is 80633.614m² in size. Both are zoned 'Rural' under the SoP, Local Planning Scheme No. 5 (PlanWA, 2026) and located approximately 6km to the west of the Kendenup townsite, see Figure 1.

Figur

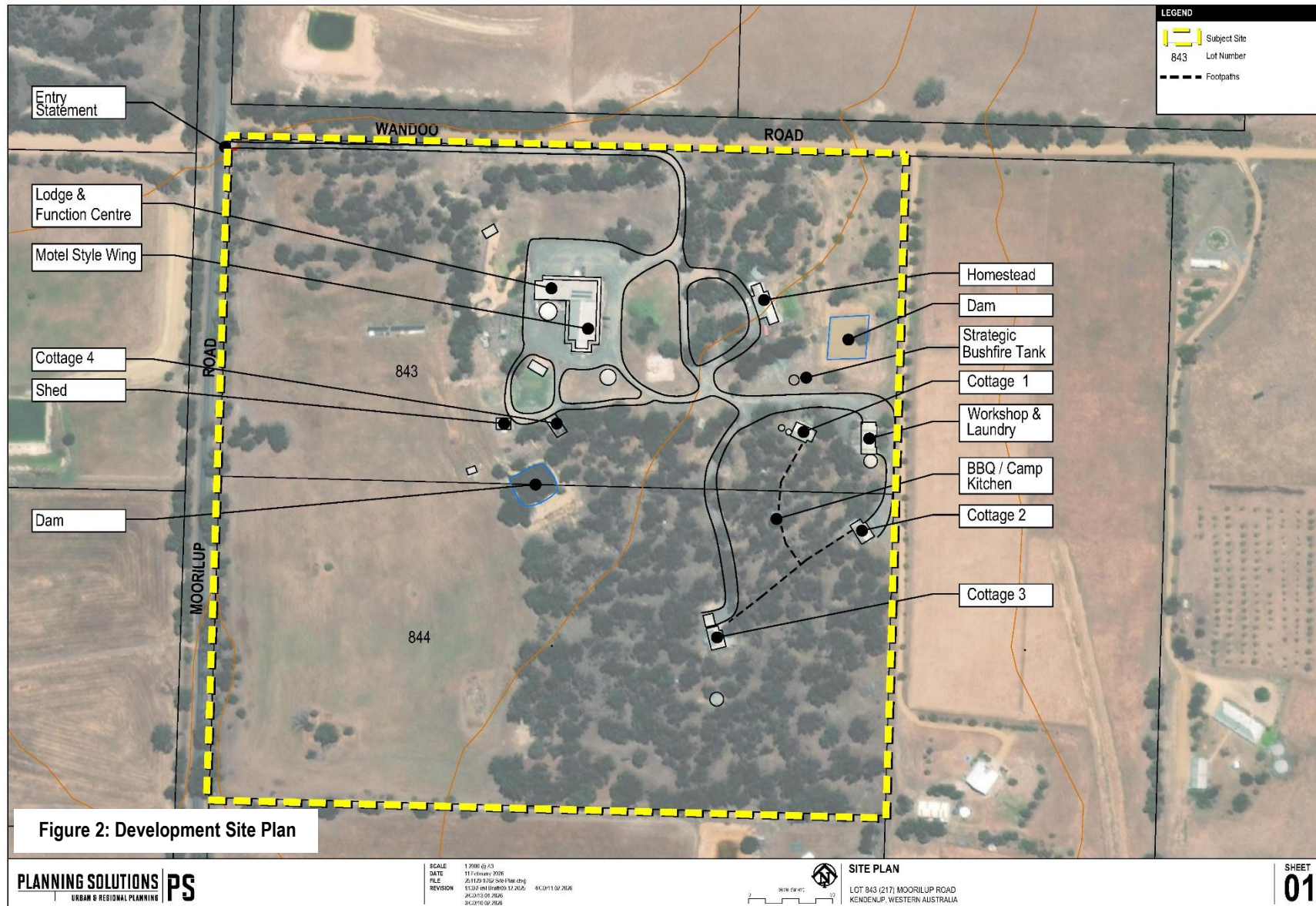


Figure 2: Development Site Plan

PLANNING SOLUTIONS PS
 URBAN & REGIONAL PLANNING

SCALE	1:2000 @ A3
DATE	11 February 2026
FILE	25.1129.01702_SMP_Plan.dwg
REVISION	13.02.2018 (LAWSON) 13.2025, 24.03.12 01.2016, 34.03.10 02.2016

SITE PLAN
 LOT 843 (217), MOORILUP ROAD
 KENDENUP, WESTERN AUSTRALIA

SHEET
01

DISCLAIMER: THIS DOCUMENT IS AND REMAINS THE PROPERTY OF PLANNING SOLUTIONS AND MAY NOT BE COPIED, IN WHOLE OR IN PART WITHOUT THE WRITTEN CONSENT OF PLANNING SOLUTIONS. ALL MEASUREMENTS AND ANGLES ARE APPROXIMATE ONLY AND ARE SUBJECT TO SURVEY DATA AND SOURCE WATER CORRECTION.

The publicly released Map of Bushfire Prone Area (OBRM, 2025) shows that the Subject Site is located within a Bushfire Prone Area (within 100m of >1ha of bushfire prone vegetation) and as such, is subject to a planning assessment of the bushfire risks. The Map of Bushfire Prone Area (OBRM, 2025) is shown in Figure 3.

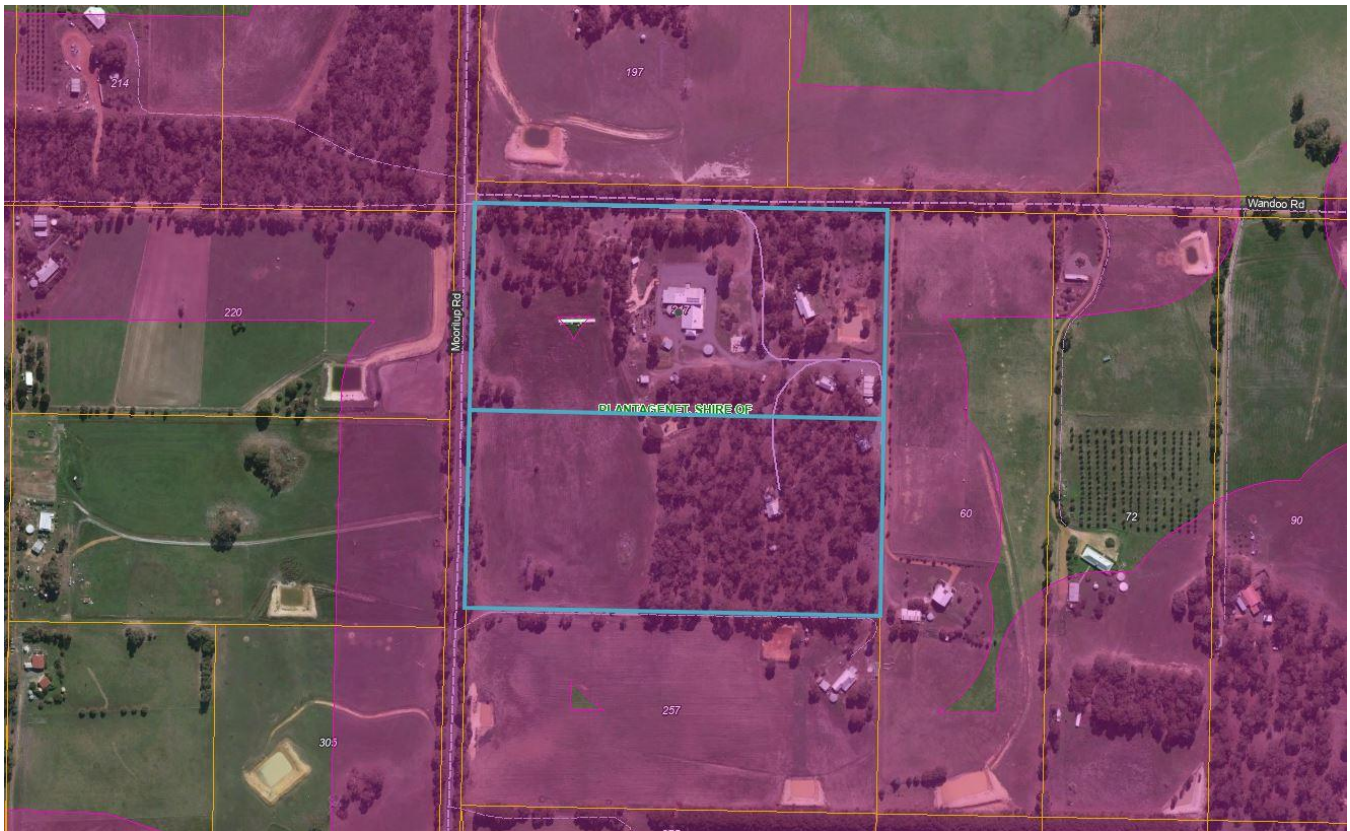


Figure 3: Map of Bushfire Prone Areas and relevance to Subject Site (OBRM, 2024)

1.3 Statutory Framework

This document and the recommendations contained within are aligned to the following policy and guidelines:

- *Planning and Development Act 2005*
- *Planning and Development (Local Planning Scheme) Regulations 2015*
- *Guide to Developing a Bushfire Emergency Plan (BEP)*
- *Guide to Developing a Bushfire Management Plan (BMP)*
- State Planning Policy (SPP) 3.7 Bushfire (WAPC, 2024a)
- Planning for Bushfire Guidelines (WAPC, 2024b)
- *Building Act 2011*
- *Building Regulations 2012*
- Building Code of Australia (National Construction Code) (NCC, n.d.)
- *Fire and Emergency Services Act 1998*
- AS3959-2018 "Construction of Buildings in Bushfire Prone Areas" current and endorsed standards
- *Bushfires Act 1954; and*
- Shire of Plantagenet Bush Fire Mitigation Notice 2025/2026 (SoP, 2026)

2 Environmental Considerations

A review of the environmental data sets (Landgate, 2022) as identified in the Department of Planning, Lands and Heritage BMP Template for a complex development application, does not identify that any regulated (restricted) vegetation will be affected by the proposal, see Table 1: Environment Dataset Review.

Table 1: Environmental Dataset Review

Dataset	Impact on Proposal	Comment
Conservation category wetlands and buffer	Yes	Resource and Environmental Protection Albany Waterways Management Area.
Wetlands and Waterways	Yes	The Subject Site is located in Albany Waterways Management Area.
RAMSAR wetlands (DBCA-010)	No	
Landscape Hazards	Yes	Soil Landscape Risk - >70% of map unit has a high to extreme wind erosion risk and <3% water erosion risk. Soil Landscape Quality – Surface acidity <3% of map unit has pHCa <4.5. <3% of map unit has a moderate to extreme surface salinity risk.
Threatened and priority flora and fauna (DBCA-036)	No	It is unlikely that priority flora will be impacted by this proposal. A flora survey has not been undertaken and this data set can only be seen at a scale of 1:200,000.
Threatened Ecological Communities (DBCA-038)	Unaware	It is unlikely that TEC's will be impacted by this proposal. A survey of the Threatened Ecological Communities (TEC) in this area has not been undertaken and this data set can only be seen at a scale of 1:200,000. Wheatbelt Woodlands TEC prevalent in the area.
Bush Forever areas 2000 (DPLH-019)	No	
Clearing regulations –Environmentally Sensitive Areas (DWER-046)	No	
Swan Bioplan Regionally Significant Natural Areas 2010 (DWER-069)	No	
Conservation Covenants Western Australia (DPIRD-023)	Unaware	This dataset is not publicly available.

Note: Relevant checks have been completed as per Table 1 above. The management strategies contained in this report, assume that all environmental approvals will be achieved or clearing permit exemptions will be applied.

2.1 Native Vegetation – Modification and Clearing

This BMP utilises the assumption that the proposed development can have an APZ in the subject lot, maintained in a low fuel state as per the WAPC Siting and Design Explanatory Notes (refer to Appendix B). Although some trees are proposed to be removed as part of the proposed APZ works (Figure 5), the trees to be removed should be flagged and inspected prior to removal in the APZ area. This will ensure only necessary trees are removed for the APZ standard to be achieved. Clearing native vegetation exemptions apply under the Bush Fire Risk Treatment Standards and the Bushfires Act for existing buildings for the APZ works. Mowing and slashing of some understorey is required. Strategies to manage low fuel areas for the landowner is outlined in Section 5.2 of this report.

2.2 Revegetation or Landscaping

There is no landscaping proposed for this development application and any future landscaping in the site will be done so as to not negatively impact the BAL rating. Further information about landscape management is provided in Section 5.2.3 of this report. It is recommended that an accredited Bushfire Practitioner is to review and approve any future plantings or landscape concept plans to ascertain if the landscaping does not increase the bushfire risk in the development.

3 Bushfire Assessment Results

The bushfire assessment for this site has been undertaken and includes the inputs and outputs from the BAL assessment to AS3959-2018.

3.1 Assessment Inputs

Bushfire Assessment inputs for the site have been calculated using the Method 1 BAL Assessment procedure as outlined in AS3959-2018. This incorporates the following factors:

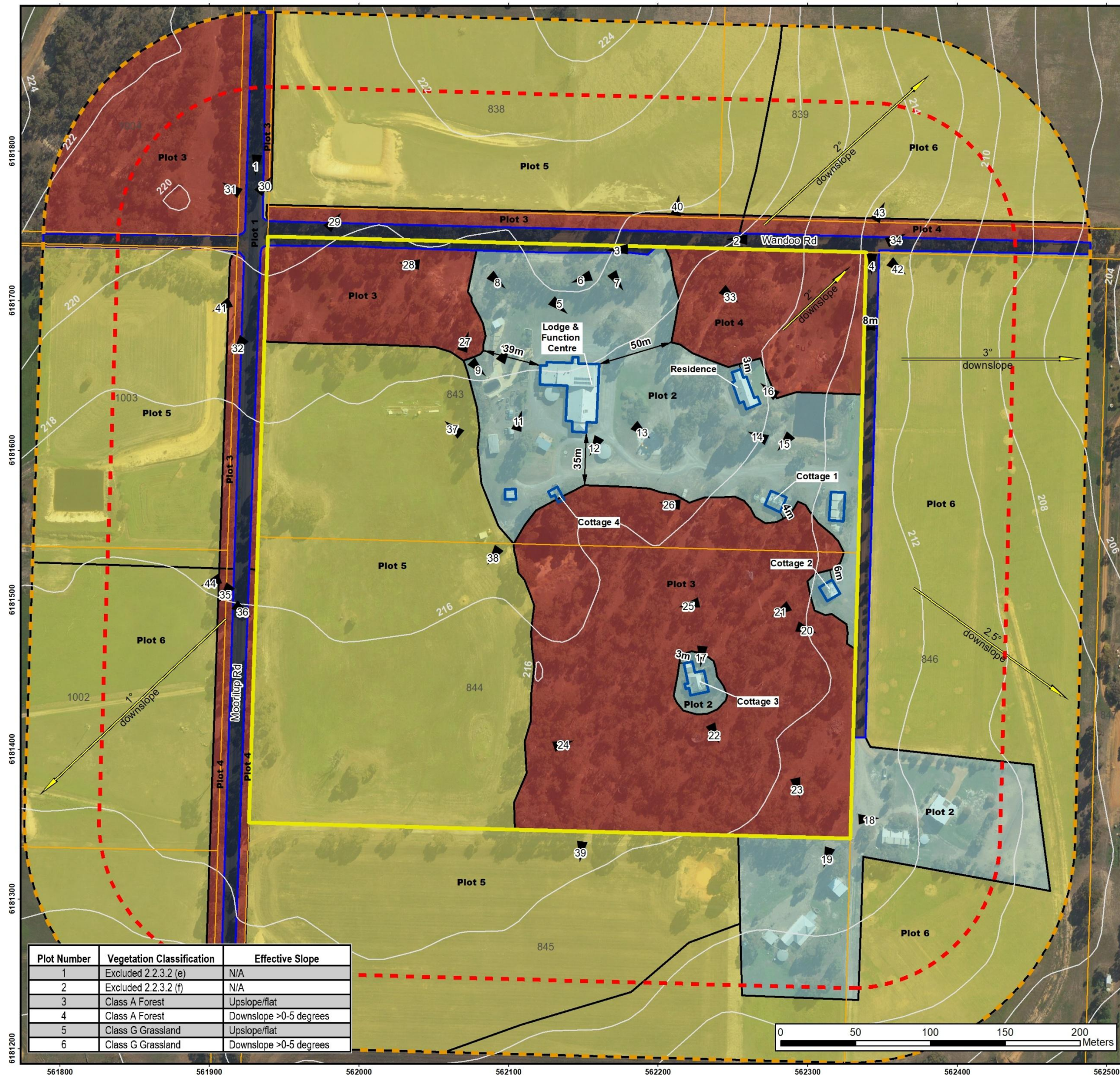
- WA adopted Fire Danger Index (FDI), being FDI 80;
- Vegetation Classes;
- Effective Slope under classified vegetation; and
- Distance between proposed development site and classified vegetation.

3.1.1 Vegetation Classification

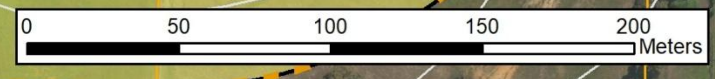
Site assessment occurred on the 11 December 2025 by Bob McGonnell (BPAD-58381 L1). All vegetation within 150m of the site/proposed development was classified in accordance with Clause 2.2.3 of AS3959-2018. Each distinguishable vegetation plot with the potential to determine the Bushfire Attack Level is identified in the following pages and shown on the Vegetation Classes Map (Figure 4) on the following page. A summary of the Plot data assessed as per Clause 2.2.3 of AS 3959-2018 is provided below in Table 2 below, detailed plot data is provided in Appendix A.

Table 2: Vegetation Classification Table (in accordance with AS 3959-2018) of the Subject Site

Plot Number	Vegetation Classification	Effective Slope
1	Excluded 2.2.3.2 (e)	N/A
2	Excluded 2.2.3.2 (f)	N/A
3	Class A Forest	Upslope/flat
4	Class A Forest	Downslope >0-5 degrees
5	Class G Grassland	Upslope/flat
6	Class G Grassland	Downslope >0-5 degrees



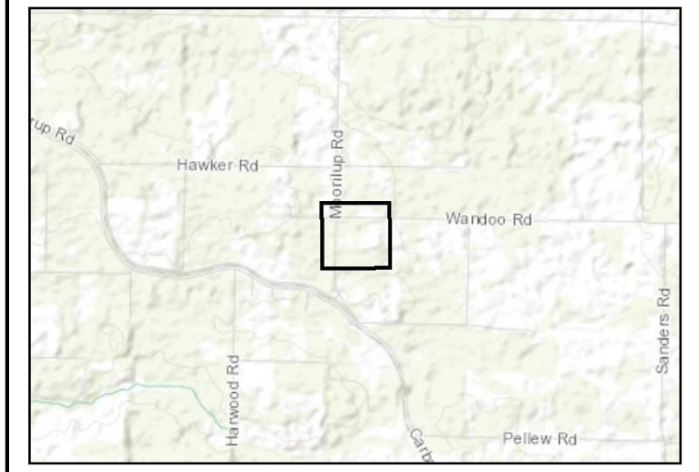
Plot Number	Vegetation Classification	Effective Slope
1	Excluded 2.2.3.2 (e)	N/A
2	Excluded 2.2.3.2 (f)	N/A
3	Class A Forest	Upslope/flat
4	Class A Forest	Downslope >0-5 degrees
5	Class G Grassland	Upslope/flat
6	Class G Grassland	Downslope >0-5 degrees



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Overview Map Scale 1:100,000

- Legend**
- Subject Site
 - Existing Building
 - 100m Assessment Boundary
 - 150m Assessment Boundary
 - Cadastre
 - 2m Contours (DPIRD-072)
 - Separation Distance
 - Effective Slope
 - Photo Point
 - Vegetation Classification Border Exclusion (e)
 - Vegetation Classification Border
- Classified Vegetation**
- A Forest
 - G Grassland
- Excluded Vegetation**
- Clause 2.2.3.2 (a), (b), (c) and (d)
 - Clause 2.2.3.2 (e) non-vegetated
 - Clause 2.2.3.2 (f) low threat vegetation

Scale
 1:2,500 @ A3
 GDA MGA 2020 Zone 50

Data Sources
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Figure 4: Vegetation Classes Map

Prepared by	Accreditation Level	Accreditation Number
BRM	1	BPAD-58381
QA Check	Drawn by	Status
KPK	BRM	FINAL
File	Date	Aerial
MSC0772	11/02/2026	May 2025

3.2 Assessment Outputs

A BAL assessment has been completed for the proposed building in accordance with AS3959-2018 methodology. The BAL rating gives an indication of the level of bushfire attack (i.e. the radiant heat flux) that may be received by proposed buildings and subsequently informs the standard of building construction required to increase building tolerance to potentially withstand such impacts in line with the assessed BAL.

The assessed BAL rating for the proposed building is indicated in Table 3.

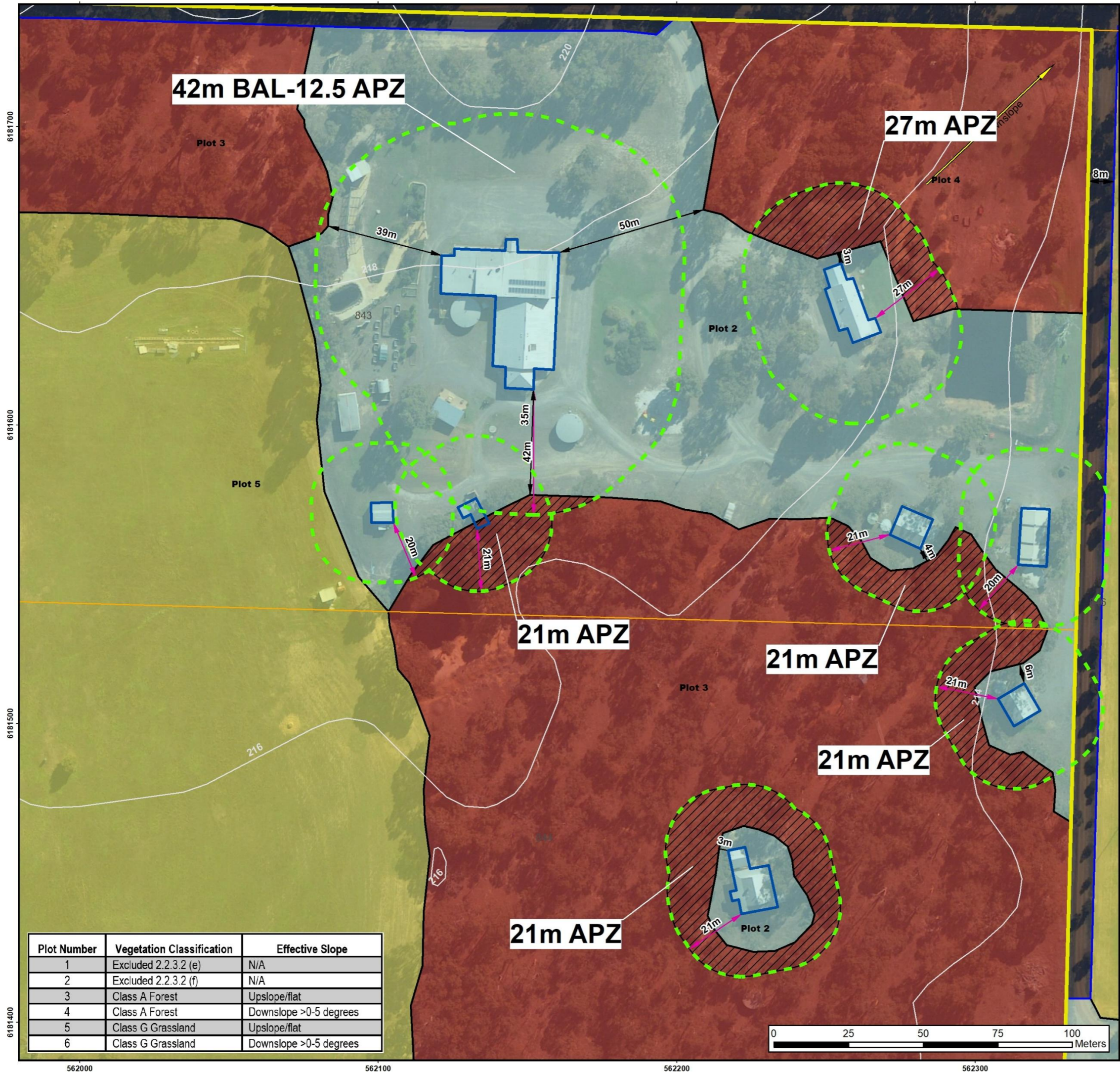
Table 3: AS3959 Determined BAL Rating for the Proposed Building

Building Id	Vegetation Classification	Effective Slope	Current separation (m)	BAL	APZ separation	Post APZ BAL Allocation
Function Centre and Motel/Lodge	Class A Forest	Upslope/flat	35	BAL – 19	42	BAL – 12.5
Residence/Homestead	Class A Forest	Downslope >0-5 degrees	3	BAL – FZ	27	BAL – 29
Cottage 1	Class A Forest	Upslope/flat	4	BAL – FZ	21	BAL – 29
Cottage 2	Class A Forest	Upslope/flat	6	BAL – FZ	21	BAL – 29
Cottage 3	Class A Forest	Upslope/flat	3	BAL – FZ	21	BAL – 29
Cottage 4	Class A Forest	Upslope/flat	0m	BAL – FZ	21	BAL – 29

Assumptions/comments on BAL assessment:

- Method 1 (AS3959-2018) Simplified procedure was used for vegetation classification and BAL Assessment process;
- The separation distance (APZ separation) required from Class A Forest vegetation plot (Plot 3) is 42m to achieve BAL-12.5 for (Lodge and Function centre) is outlined in Table 3, indicating the site is subject to ember attack (AS3959, 2018) from a bushfire;
- The separation distance (APZ separation) required from Class A Forest vegetation plot (Plot 3) is 21m to achieve BAL-29 for the four cottages is outlined in Table 3, indicating the site is subject to radiant heat and ember attack (AS3959, 2018) from a bushfire;
- The separation distance (APZ separation) required from Class A Forest vegetation plot (Plot 4) is 27m to achieve BAL-29 for the Managers residence is outlined in Table 3, indicating the site is subject to radiant heat and ember attack (AS3959, 2018) from a bushfire;
- Asset Protection Zones are to be installed around all buildings, the proposed strategic water tank and shed as per Figure 5 – Works Program Mapping. This should be undertaken in accordance with the approved BMP at DA condition;
- The proposed development and assumptions contained within this BMP are based on the site plan supplied by the client (Figure 2); and
- Subject Site is located in a Bushfire Prone Area, see Figure 3 (OBRM, 2024).

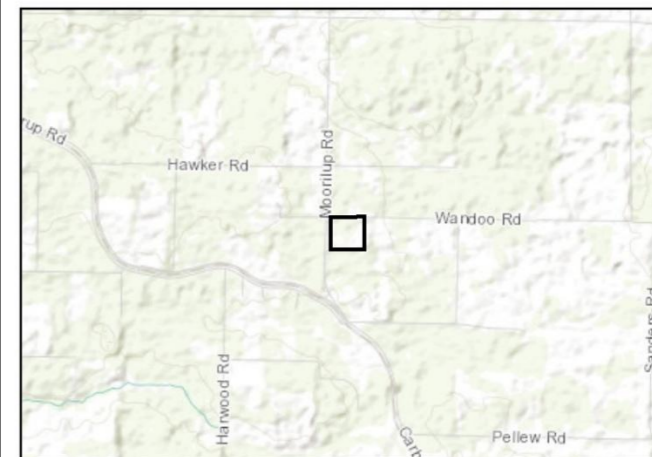
A BAL Contour plan (Figure 6) outlines the allocated BAL rating on the existing buildings post APZ works (refer to Figure 5). Noting that retrospective construction to AS3959 may not be required. The future low-threat vegetation, as indicated in Figure 5: Works Program Map, has been excluded from the BAL contour mapping, as it is expected that in the future, this vegetation will be removed as part of the implementation of the APZs.



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Overview Map Scale 1:100,000

Legend

- Subject Site
- Existing Building
- Cadastre
- 2m Contours (DPIRD-072)
- Separation Distance
- APZ Separation Distance
- Effective Slope
- Asset Protection Zone (APZ)
- Future Low Threat
- Vegetation Classification Border Exclusion (e)
- Vegetation Classification Border

Classified Vegetation

- A Forest
- G Grassland

Excluded Vegetation

- Clause 2.2.3.2 (a), (b), (c) and (d)
- Clause 2.2.3.2 (e) non-vegetated
- Clause 2.2.3.2 (f) low threat vegetation

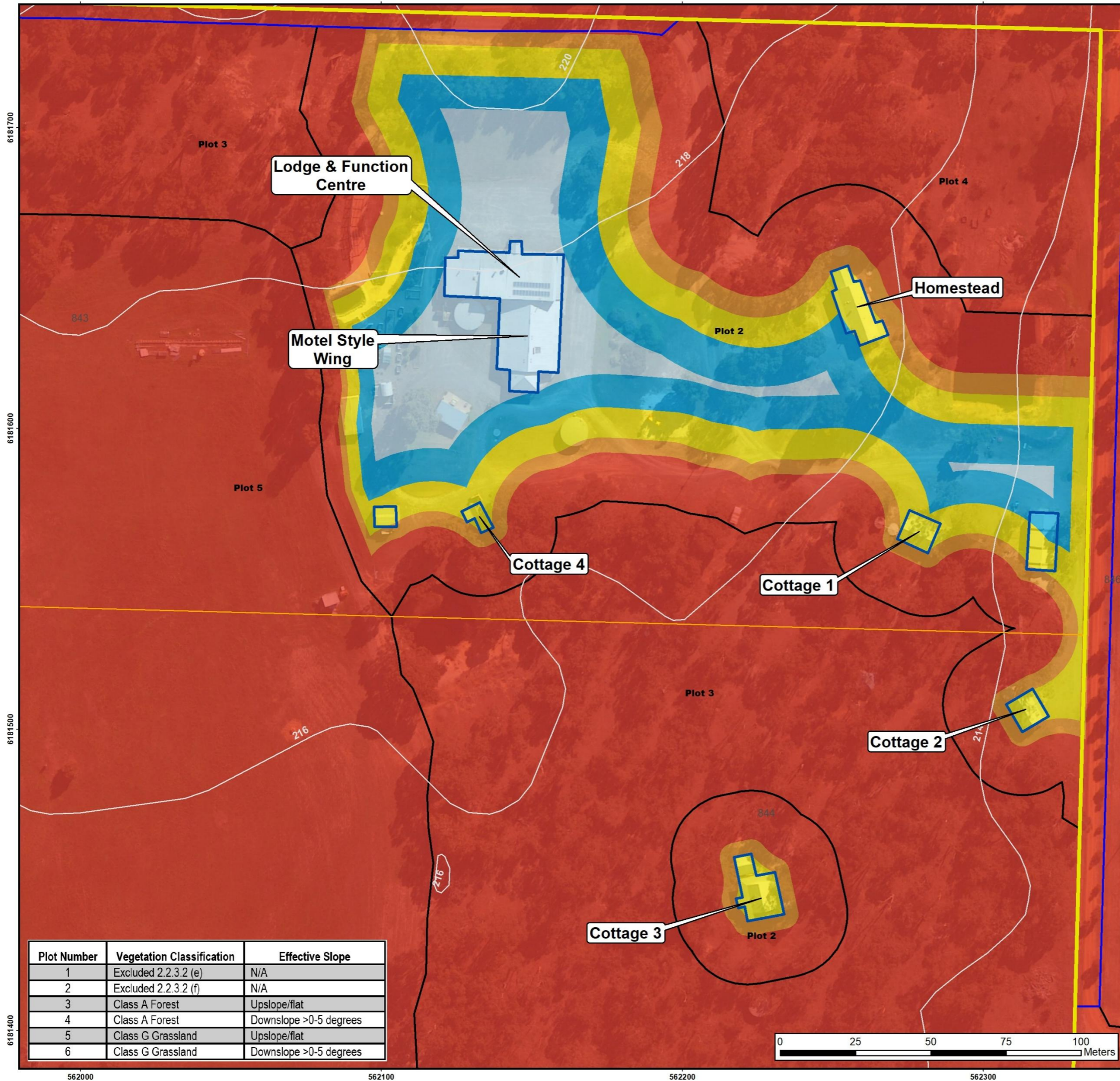
N
 Scale
 1:1,250 @ A3
 GDA MGA 2020 Zone 50

Data Sources
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Figure 5: Works Program Mapping

Prepared by	Accreditation Level	Accreditation Number
BRM	1	BPAD-58381
QA Check	Drawn by	Status
KPK	BRM	DRAFT
File	Date	Aerial
MSC0772	11/02/2026	May 2025



Plot Number	Vegetation Classification	Effective Slope
1	Excluded 2.2.3.2 (e)	N/A
2	Excluded 2.2.3.2 (f)	N/A
3	Class A Forest	Upslope/flat
4	Class A Forest	Downslope >0-5 degrees
5	Class G Grassland	Upslope/flat
6	Class G Grassland	Downslope >0-5 degrees

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Overview Map Scale 1:100,000

Legend

- Subject Site
- Existing Building
- Cadastre
- 2m Contours (DPIRD-072)
- Vegetation Classification Border Exclusion (e)
- Vegetation Classification Border

BAL Contours

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

N
 Scale
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Figure 6: BAL Contour Plan

Prepared by BRM	Accreditation Level 1	Accreditation Number BPAD-58381
QA Check KPK	Drawn by GSK	Status DRAFT
File MSC0772	Date 11/02/2026	Aerial May 2025

4 Identification of Bushfire Hazard Issues

4.1 Bushfire Risk Considerations

The bushfire risks associated with the Subject Site primarily originate from surrounding external remnant forest vegetation to the north and northwest and internal forest vegetation to the northwest, northeast and south. These areas are predominantly classified as Forest Class A, which presents the highest risk to the site under Extreme to Catastrophic bushfire weather conditions. Forest Class A Vegetation is classified as an “Extreme” Bushfire Hazard Level (BHL) (WAPC, 2024b). Existing paddock areas internal and external to the north, west, south and east present as Grassland Class G and a “Moderate” BHL (WAPC, 2024b) with grassland having the potential fire run from all directions into the subject site.

APZ works associated with all the buildings is proposed and shown in Figure 5. An APZ is required around all classified “Vulnerable Use buildings”, being “Vulnerable Commercial” (Class 3) (as defined in SPP 3.7) and existing residential/Managers building (Class 1). The APZ demonstrated on Figure 5 ensures all buildings to achieve BAL-29 or less.

Some trees will need to be removed to achieve the APZ areas, however should be flagged and taped prior to removal so only necessary tree removal is undertaken to meet the defined APZ standards (refer to Appendix B). Exemptions to the EP Act 1986 can be applied for APZ works for the existing buildings and a clearing permit will not be required. Exemptions to be utilised includes the Bush Fire Risk Treatment Standards 2020 and the SoP Bush Fire Mitigation Notice (25/26). Clearing for BAL reduction can be undertaken through approval of this BMP and subject to DA conditions. Vegetation modification outside of 20m will require DA approval prior to works occurring.

A BAL allocation of BAL-12.5 can be achieved on the Function Centre and Motel/Lodge. BAL-29 can apply to the existing four cottages. The BAL Assessment has been prepared to assess the site for bushfire risk, with BAL-12.5 indicating there is a risk of ember attack and BAL-29 indicating there is a risk of radiant heat and ember attack on the building (s) (AS3959, 2018). The proposal satisfies the acceptable solutions of the Bushfire Protection *Criteria 8: Development - Vulnerable Class 9 Buildings*, Element 2: Siting and Design (WAPC, 2024b), by ensuring that each building includes sufficient space to achieve a radiant heat impact of no more than 29 kW/m² (BAL-29). As demonstrated in Section 3 of this BMP report.

An optional fuel reduction strategy is also outlined in Section 5.2.5, whereby a more comprehensive fuel reduction burning program can be developed, which is designed to have minimum conflict between protection of assets (life and property) and biodiversity values. A series of cells can be proposed for the subject area in forested plots with a rotation between 8-10 years depending on the location and vegetation diversity. Strategically deployed, fire can assist naturally regenerating areas to re-establish and for ongoing bushfire protection to the internal structures/buildings.

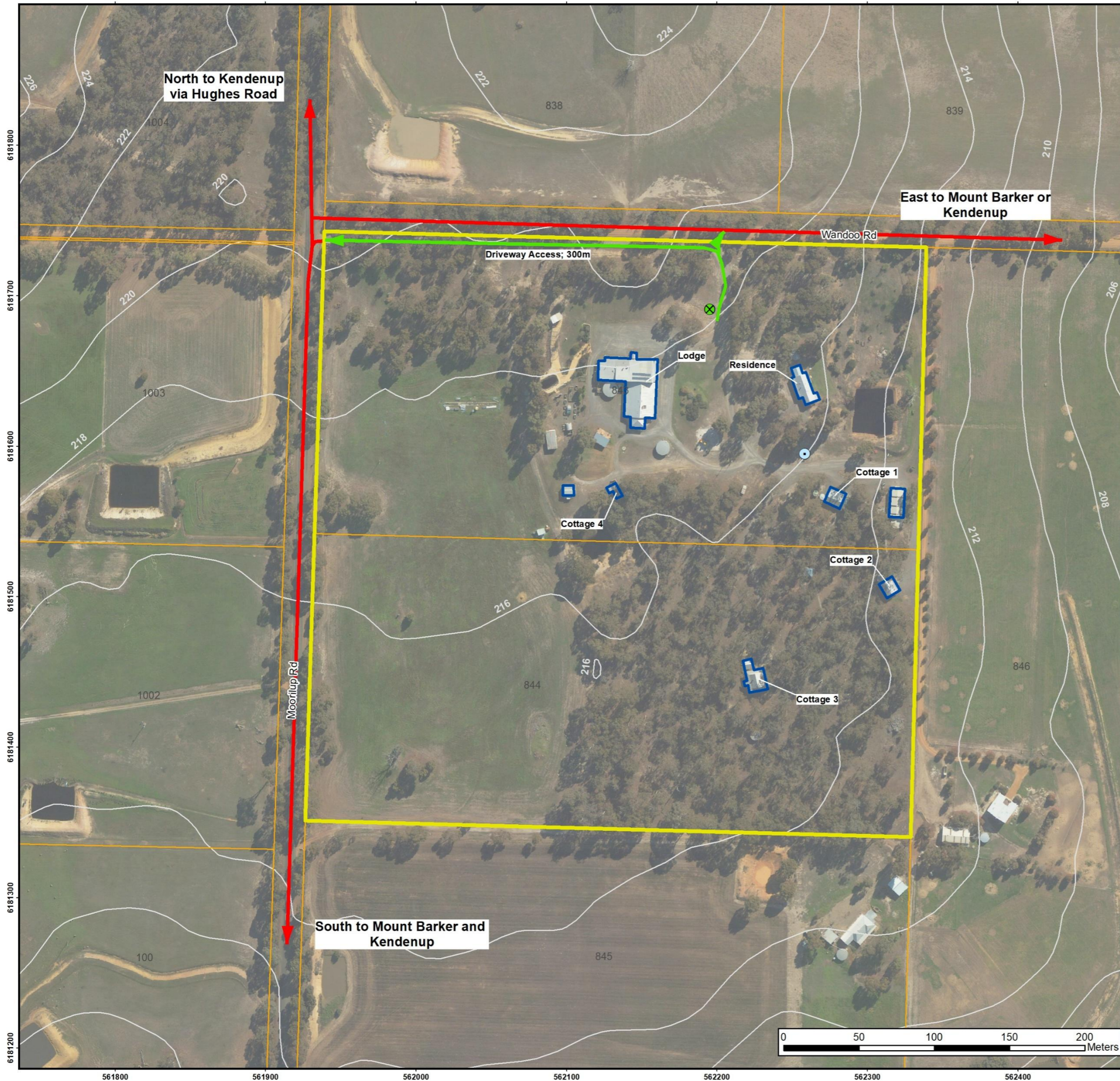
4.2 Access

The Subject Site is accessed off Moorilup Road to the west via an existing internal driveway. Moorilup Road, which along with the existing surrounding road network provides options to travel in two different directions to two suitable locations either west to Kendenup townsite or south to Mount Barker Townsite. Refer to Figure 7: Access and Water Map. All public roads are constructed to the required standard and provide safe access and egress in two different directions to two different destinations. No new public roads will be constructed as part of this proposal and the existing public road network is constructed to the required standards.

An existing driveway services the Subject Site off Moorilup Road. This is approximately 300m long to the Function Centre and Motel/Lodge and has a minimum of a 4m wide stabilised surface, 6m wide horizontal clearance. Some trimming of trees along all internal driveways will be required to meet and 4.5m vertical clearance. A turnaround area is provided at the central Function Centre and Motel/Lodge and the residence, however additional turnaround areas will be required at all other cottages buildings. Passing bays should be constructed every 200m with a minimum length of 20 metres and a minimum additional carriageway width of 2 metres (that is, the combined carriageway width of the passing bay and constructed private driveway to be a minimum 6 metres). All driveways should meet the minimum technical requirements established by the guidelines, see Figure 8: Private Driveway Technical Requirements and Figure 9, Turnaround and Passing Bay requirements, and be checked for compliance as a condition of the DA.

4.3 Water Supply

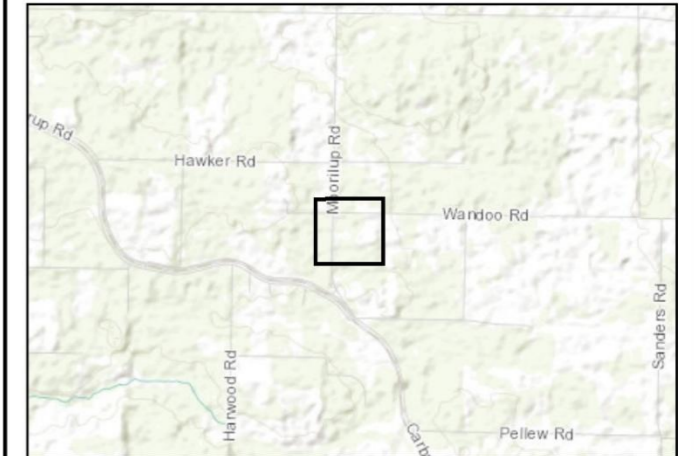
A reticulated water supply is not currently available to the subject site, water storage for bushfire purposes should be a minimum 60,000L (6 habitable buildings in total). This needs to be a standalone supply with a dedicated filling procedure. The Strategic water tank is shown on the Development Site Plan, refer to Figure 7: Access and Water Map. With the implementation of the 60,000L strategic tank (10,000L/habitable building), the proposal will meet the acceptable solutions of the guidelines. All strategic water tanks should meet the minimum technical standards of the guidelines and outlined in Section 5.2.4 of this report.



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Overview Map Scale 1:100,000

Legend

- Subject Site
- Existing Building
- Cadastre
- 2m Contours (DPIRD-072)
- Access Route
- Driveway Access
- Turnaround
- Proposed Strategic Bushfire Water Tank (60,000L)

N
 Scale
 1:2,500 @ A3
 GDA MGA 2020 Zone 50

Data Sources
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Figure 7: Access and Water Map

Prepared by BRM	Accreditation Level 1	Accreditation Number BPAD-58381
QA Check KPK	Drawn by BRM	Status FINAL
File MSC0772	Date 29/01/2025	Aerial May 2025

5 Assessment against the Bushfire Protection Criteria

5.1 Compliance Table Acceptable Solutions

The Planning for Bushfire Guidelines (WAPC, 2024b) outlines bushfire protection criteria which development proposals are assessed for compliance. The bushfire protection criteria (WAPC, 2024b) are performance-based criteria utilised to assess bushfire risk management measures. The bushfire protection criteria (WAPC, 2024b) applicable *Criteria 8: Development - Vulnerable Class 9 buildings*, outlining three elements, being:

- Element 2: Siting and Design of Development;
- Element 3: Vehicle Access; and
- Element 4: Water.

The Subject Site and the plan of development have been assessed and are required to meet the “Acceptable Solutions” of each element of the bushfire mitigation measures (WAPC, 2024b). The proposal has been assessed against all elements of the bushfire protection criteria – Criteria 8 of the WAPC guidelines and found to be compliant, refer to Table 4.

Table 4: Bushfire protection criteria applicable to the Subject Site

Element	Acceptable Solution	Applicable or not Yes/No	Proposal meets Acceptable Solution
Element 2 – Siting and Design	A2.1 Siting and design	Yes	<p>Compliant</p> <p>The proposed Function Centre and Motel/Lodge building (Class 3) is currently subject to a BAL rating of BAL-19, with minor APZ works will be subject to BAL-12.5. The existing cottages and Managers residence (Homestead) are subject to a BAL-FZ, once the APZ works are implemented as shown in Figure 5, BAL-29 can prevail. T</p> <p>Proposal meets Acceptable Solution A2.1.</p>
	A2.2 Asset Protection Zone (APZ)	Yes	<p>Compliant</p> <p>BAL-29 or less can prevail on the defined vulnerable land use buildings. SAC as the new land owner will have the responsibility of maintaining the APZ areas as shown in Figure 5 in a low threat state in perpetuity, see Schedule 1 - WAPC Asset Protection Zone (APZ) technical requirements to apply in Appendix B of this report. Also refer to additional APZ management information Section 5.2.3 of this report. The APZ is solely contained within the subject site, excepting Cottage 2 which utilises the low fuel area of an existing private driveway external to the east of the site.</p> <p>Proposal meets Acceptable Solution A2.2.</p>
	A2.3 Clearing of native vegetation	Yes	<p>The existing buildings will require some tree removal and slashing to achieve the compliant APZ standards. Selective removal is recommended with flagging prior to removal so the site is not devoid of trees. Exemptions under the EP Act can apply to the APZ works and should be implemented once DA approval is given. A minimum of 20m APZ applies to all existing assets (sheds etc) as per the SoP Bush Fire Mitigation notice, which is exempt from a clearing permit.</p> <p>Proposal meets Acceptable Solution A2.3.</p>
	A2.4 Landscape management plan	Yes	<p>A landscape management plan in the form of a compliant Works Program Mapping has been prepared as per Figure 5 and Section 5.2.3. Low fuel plantings in APZ areas can only be undertaken in accordance with this BMP (refer to Section 5.2.3), this plan ensures vegetation is managed to maintain a low fuel environment. Low fuel plantings and landscape plans to be approved by the Bushfire Consultant prior to implementation.</p> <p>Proposal meets Acceptable Solution A2.4.</p>
	A2.5 On-site shelter	No	<p>Proposal is not a school, not assessed to Acceptable Solution A2.5.</p>

Table 4: cont.

Element	Acceptable Solution	Applicable or Not Yes/No	Proposal meets Acceptable Solution
	A2.6 Storage of hazardous, flammable and/or combustible materials	No	No storage of hazardous, flammable and or combustible materials is proposed, not assessed to Acceptable Solution A2.6.
Element 3 – Vehicular Access	A3.1 Public roads	Yes	Compliant There are no new public roads to be constructed as part of this development. All existing public roads are 6m wide and the surrounding public road network are constructed in accordance with the minimum technical requirements set out in the Planning for Bushfire Guidelines (Appendix B.3, Table 10: Vehicular Access Standards). Proposal meets Acceptable Solution A3.1.
	A3.2 Access routes	Yes	Compliant The existing public roads provide access in two different directions to at least two different suitable destinations. Moorilup Road is a north-south thoroughfare that provides access to suitable destinations, either Kendenup or Mount Barker townsite(s). Proposal meets Acceptable Solution A3.2.
	A3.3a No-through roads	No	The Subject Site is located on a road with two-way access in two different directions. Not assessed to Acceptable Solutions A3.3a.
	A3.3b No-through roads requirements	No	Not Assessed to Acceptable Solution A3.3b.
	A3.4 Emergency access way	No	No EAWs proposed, not assessed to A3.4
	A3.5 Fire service access route	No	The public road network will be used, not assessed to A3.5.
	A3.6 Internal vehicular access and private driveway	Yes	Compliant The development will have compliant internal driveways for emergency access and egress of vehicles. The driveway measures 300m long from Moorilup Road and will require 1 passing bay. The driveways will all be 6m wide horizontal clearance, 4.5m vertical clearance and 4m stabilised all weather access. Parking and turnaround access is provided for the day use area at the Function Centre and Motel/Lodge. The driveway will meet the technical requirements established by the WAPC guidelines as shown in Figure 8 of this report. Proposal can meet Acceptable Solution A3.6.
	A3.7 Signage	Yes	Compliant Signage is to be provided in the car park area advising entry/exit points for the site and what route to take to exit the site safely. Proposal can meet Acceptable Solution A3.7.
Element 4 – Water	A4.1 Water supply	Yes	Compliant. A reticulated water supply is not currently available to the subject site, water storage for bushfire purposes should be a minimum 60,000L (6 habitable buildings in total 10,000L/habitable building required). A proposed strategic water tank is location is shown on Figure 2 and Figure 7, to be implemented as a DA condition. The standards for water supply for bushfire is to meet standards as outlined by the WAPC guidelines and in Section 5.2.4 of this report. Proposal meets Acceptable Solution A4.1.

5.2 Other Bushfire Mitigation Measures

The bushfire risk assessment (Section 4.0) has outlined bushfire risks for the site the future development of this site. The following section outlines additional measures to assist in mitigating the bushfire risk for the proposed development.

5.2.1 Access

The minimum technical standards to achieve at this site are shown in Figure 8 below, specifically private driveway standards as shown in Column 5.

TECHNICAL REQUIREMENTS	1 PERIMETER ROADS		2 PUBLIC ROADS		3 EMERGENCY ACCESS WAY ³		4 FIRE SERVICE ACCESS ROUTE ³		5 BATTLE-AXE & PRIVATE DRIVEWAYS ¹	
	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1
MAP OF BUSH FIRE PRONE AREAS DESIGNATION	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1
Minimum horizontal clearance (metres)	12	8	See note 5		10	6	10	6	6	
Minimum vertical clearance (metres)	4.5									
Minimum weight capacity (tonnes)	15									
Maximum grade unsealed road ²	See note 5		See note 5		1:10 (10% or 6°)					
Maximum grade sealed road ^{2,4}	See note 5		See note 5		1:7 (14.3% or 8°)					
Maximum average grade sealed road	See note 5		See note 5		1:10 (10% or 6°)					
Minimum inner radius of road curves (metres)	See note 5		See note 5		8.5					

Notes:

- ¹ Driveways and battle-axe legs to comply with the Residential Design Codes and Development Control Policy 2.2 Residential Subdivision where not required to comply with the widths in this Appendix or the Guidelines.
- ² Dips must have no more than a 1 in 8 (12.5% - 7.1 degrees) entry and exit angle.
- ³ To have crossfalls between 3 per cent and 6 per cent.
- ⁴ For sealed roads only the maximum grade of no more than 1 in 5 (20 per cent) (11.3 degrees) for no more than 50 metres is permissible, except for short constrictions to 3.5 metres for no more than 30 metres in length where an obstruction cannot be reasonably avoided or removed.
- ⁵ As outlined in the Institute of [Public Works Engineering Australasia \(IPWEA\) subdivision guidelines](#), [Liveable Neighbourhoods](#), [Austroads Standards Main Roads](#) standard, supplement, policy or guideline and/or any applicable or relevant local government standard or policy.

Figure 8: Private Driveway Technical Requirements

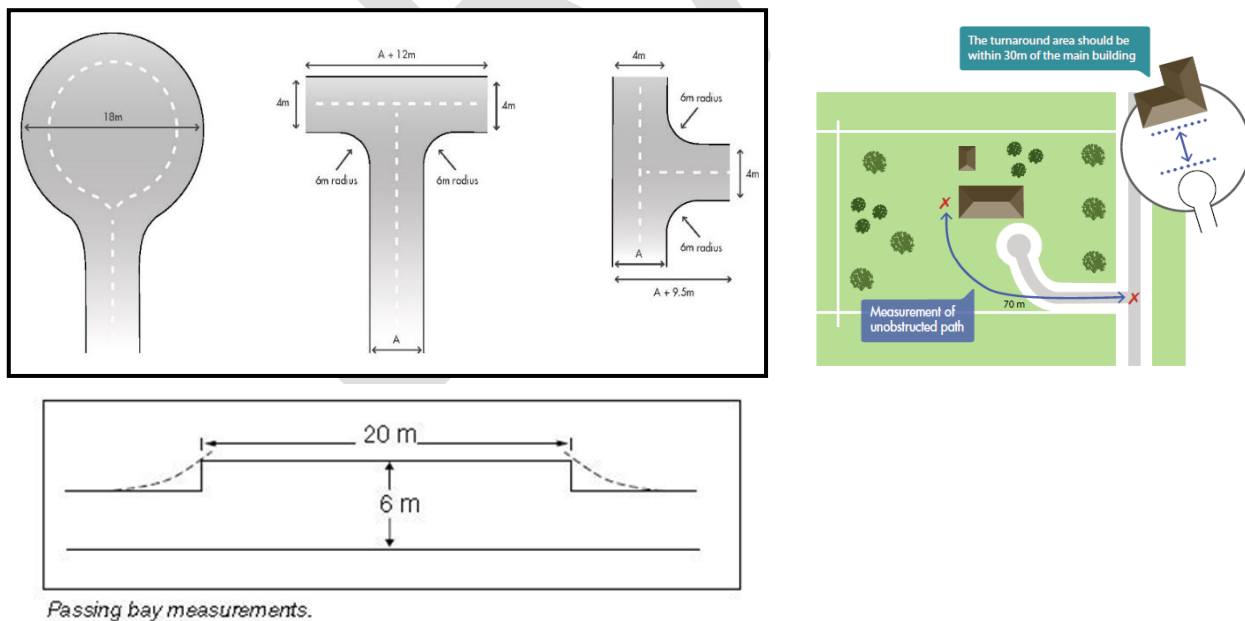


Figure 9: Turn Around and Passing Bay Requirements (WAPC, 2024b)

5.2.2 Minimise Ignition Sources

There is little control of offsite ignition sources, however the following is recommended to be undertaken by SACs while in ownership of the land.

Prior to the bushfire season (before 15th November) the following activities are undertaken:

- Mowing, slashing and brush cutting (noting illegal to do so on designated total fire ban days); and
- Sub-contractors are aware of their obligations through contractual requirements.

During the summer bushfire season (15th November to 31st March inclusive or as designated in the SOP Bush Fire Mitigation Notice) maintenance activities internal to the site should be planned and risk assessed prior to commencement. This includes but not limited to:

- Mowing, slashing and brush cutting (noting illegal to do so on designated total fire ban days); and
- Temporary waste disposal areas and green waste dumps – ensure piles are not exceeding 1.5m high and have bare mineral earth surrounding (min of 10m).

SACs is responsible for safety in construction activities during the bushfire season and are to ensure safety of the site and adjacent properties at all times from potential ignition sources.

5.2.3 Fuel Reduction, APZ and Landscape Management

This APZ and Landscape Management Plan has been prepared in accordance with A2.4. Ongoing management by SACs is required to ensure their allocated BAL applies in perpetuity. This includes management of landscaped areas and buildings are to be inspected regularly for build-up of wind-borne debris and leaf accumulation in gutters and at penetrations to buildings (doors, windows, etc). SACs is to be responsible for implementation of the maintenance schedule to maintain their BAL allocation APZ area and general bushfire preparedness which should generally reflect the following actions, refer to Table 5.

Table 5: Maintenance schedule

<i>Frequency</i>	<i>Activity</i>
Weekly (During fire season operations and prior to bushfire event) Also refer to Schedule 1 (Appendix B)	Check all buildings for wind borne debris build up and remove.
	Check gutters are free from vegetation or overhanging vegetation.
	Trimming and removing dead plants or leaf litter.
	Pruning climbing vegetation (such as vines) on a trellis, to ensure it does not connect to a building, particularly near windows and doors.
	Check outdoor objects around buildings (see list below).
	Raking and sweeping windborne debris near doors, openings, roller doors and window spaces.
Monthly	Mowing, slashing and maintaining grasses, more frequently during spring and autumn growth periods.
	Whipper snipper/grass cutter around all buildings.
	Check no combustible materials are stored near buildings or penetrations of buildings (windows, doors etc), includes but not limited to – gas bottles, fences, stored combustible material, vines, plants etc.
	Check hardstand areas are clear and traversable.
	Ensure weeds or woody material is not encroaching into the lot and around buildings, attend to any dead material in landscaped areas through trimming and pruning, raking and removing to green waste.
	Any material from pre fire season preparation is either disposed to green waste or burn in piles away for the buildings with a 10m mineral earth break around the pile.
	Ensure no overhand of trees to Strategic water tanks and a 10m mineral earth break is maintained.
Seasonally (prior to and following the bushfire season)	Conduct a full inspection of the site, including assessment of vegetation condition, fuel loads, signage visibility, tank operation, and access routes. Record findings and schedule any required maintenance or corrective actions.
	Review fuel loads and vegetation structure within the APZ/low fuel landscaped plantings.
	Update and implement the site's landscape management plan.

Table 5 cont.

Frequency	Activity
	Ensure canopy cover within the APZ/low fuel planting areas remains below 15%, and tree canopies are spaced at least 5m apart. To maintain this standard, no additional trees should be planted within the low fuel landscaped areas. Existing trees must be managed in accordance with Appendix B: Siting and Design Explanatory Notes – Table 9: APZ Technical Requirements.
	Remove lower branches and loose bark to a minimum height of 2m above ground.
	Maintain fine fuel loads (dead leaves, twigs, bark <6mm) below 2 t/ha.
	Avoid clumps of shrubs larger than 5m ² and maintain a minimum 10m separation from the building.
	Use non-combustible mulch (e.g. gravel, crushed rock) within the APZ area.

These measures support the ongoing function of the APZ, together with low-fuel landscaped plantings, to ensure the APZ remains compliant with the Planning for Bushfire Guidelines (WAPC, 2024a). The site manager is responsible for coordinating these activities and maintaining bushfire preparedness throughout the year.

Prior to a bushfire event best practice recommends that objects within the APZ are moved away from the building prior to any bushfire event. Objects may include, but are not limited to:

- Door mats;
- Outdoor furniture;
- Potted plants;
- Shade sails or umbrellas;
- Plastic garbage bins;
- Firewood stacks;
- Flammable sculptures; and
- Playground equipment and children's toys.

These should always be considered in the proximity to buildings and stored appropriately when not in attendance at site. Consider any replanting or landscaping refer to the Department of Fire and Emergency Services (DFES) [Firewise Gardening in Western Australia](#). Bushfire – Plant Selection Key or aim for plants within the APZ that have the following characteristics:

- Grow in a predicted structure, shape and height;
- Are open and loose branching with leaves that are thinly spread;
- Have a coarse texture and low surface-area-to-volume ratio;
- Will not drop large amounts of leaves or limbs, that require regular maintenance;
- Have wide, flat, and thick or succulent leaves;
- Trees that have bark attached tightly to their trunk or have smooth bark;
- Have low amounts of oils, waxes, and resins (which will often have a strong scent when crushed);
- Do not produce or hold large amounts of fine dead material in their crowns; and
- Will not become a weed in the area.

Also refer to Appendix B: Siting and Design Explanatory Notes. Further information can be found in the [Bushfire Preparation Toolkit \(2024\)](#), Department of Fire and Emergency Services (DFES).

5.2.4 Strategic Water Sources for Bushfire

Strategic, standalone water sources for bushfire and structural fires is required within the site. Strategic water is supplied for bushfire in addition to water required for drinking and domestic water purposes. A minimum of 10,000L/habitable building will be installed as per Schedule 2 of the WAPC guidelines (WAPC, 2021):

- Above ground tanks: should be constructed of a non-combustible material, and may need to comply with AS/NZ 35001:2018. Fittings for above ground tanks are to be in accordance with the following standards:
- Commercial land uses: 125mm Storz fitting; or
- Strategic water tanks: 50mm or 100mm male camlock coupling with full flow valve; and
- Combined water tanks: 50mm male camlock coupling with full flow valve or a domestic fitting, being a standard house hold tap that enables an occupant to access the water supply with domestic hoses or buckets for extinguishing minor fire.

- Below ground tanks: Should have a 200mm dia access hole to allow tankers or emergency service vehicles to refill direct from the tank with the outlet clearly marked on the top. The tank may need to comply with AS/NZ 35001:2018.
- Tank outlets: Where an outlet is provided for an emergency service then an unobstructed, hardened surface is to be provided within 4m of the water supply. Refer to Figure 10 below outlining the location of a tank to a hardstand area.
- Pipe fittings: All above-ground; exposed water supply pipes and fittings should be metal. Fittings should be located away from the source of the bushfire attack.
- Water tank location: Tanks are to be located with a consideration to surrounding vegetation and should avoid locations where the tanks is situated near or under vegetation or where vegetation might grow or overhang the tank. Refer to Figure 10 below.



Figure 10: A good and a bad example of landscaping around a water tank and associated hardstand areas (WAPC, 2021)

5.2.5 Fuel reduction and burning

A fuel reduction strategy should be designed with two main aims:

- To protect life, property and assets; and
- Promote and protect environmental and biodiversity assets.

The fuel reduction strategy should be based on two methods of fuel reduction:

1. Establishment and maintenance of existing and new of Asset Protection Zones – as outlined in Figure 5. This is mainly associated with achieving BAL-29 or less on buildings which gives a circle of safety for protection of assets/life and a safety area of fire crews to combat fire to protect assets. This also includes aiming to maintain grasses in paddock areas to less than 10cm at all times.
2. Fuel reduction burning operations – as outlined in the following section with priority given to protection of life property and assets; and environmental and biodiversity assets in the wider forested areas of the subject site.

A fuel reduction burning program can be developed, which is designed to have minimum conflict between protection of assets (life and property) and biodiversity values. Further refinement of the program will occur during the life of this BMP and an update of any strategies deployed should be undertaken annually or as burns are completed. A series of cells can be proposed for the subject area with a rotation between 8-10 years depending on the location and vegetation diversity. Strategically deployed, fire can assist naturally regenerating areas to re-establish and for ongoing bushfire protection to the internal structures/buildings.

Fuel loads refers to the amount of flammable material available for a fire to burn. Fuel loads in forest areas are generally recommend to be maintained at or below 8 tonnes per hectare. This is equal to 8 handfuls of flammable material per square metre.

The forest areas in the Subject Site could have rotational burning to assist with management of fuel loads. Planned burning reduces the amount of fuel during cooler months to decrease risk of bushfires during the hotter months. It protects lives, property, infrastructure and the environment from bushfires through a carefully designed system of fuel reduced areas.

Any burning will be subject to the SoP Bush Fire Mitigation Notice which is updated annually and should be consulted from: www.plantagenet.wa.gov.au.

Further information on fuel reduction burning can be obtained from DFES at: https://www.dfes.wa.gov.au/documents/BurnSmart_Guide_2021.pdf

Seasonal conditions may result in changes to the burning period dates, depending on the timing of the prescribed burning program - burning permits are required during “Restricted Burning Time” if operations are undertaken during these times.

Any fuel reduction burning must only be undertaken by appropriately qualified and authorised personnel. Landowners and site managers should not conduct burning activities without professional guidance, appropriate approvals, and adherence to all regulatory requirements.

5.2.6 Barrier Fencing

In November 2010, the Australian Bushfire CRC issued a “Fire Note” (Bushfire CRC, 2010), which outlined the potential for residential fencing systems to act as a barrier against radiant heat, burning debris and flame impingement during bushfire. The research aimed to observe, record, measure and compare the performance of commercial fencing of Colourbond steel and timber (treated softwood and hardwood).

The findings of the research found that:

“.. Colourbond steel fencing panels do not ignite and contribute significant heat release during cone calorimeter exposure” (exposure to heat)

“.. Colourbond steel (fencing) had the best performance as a non-combustible material. It maintained structural integrity as a heat barrier under all experimental exposure conditions, and it did not spread flame laterally and contribute to fire intensity during exposure”

It is also noted that non-combustible fences are recommended by WAPC (WAPC, 2021), through APZ standards: Fences and sheds within the APZ are constructed using non-combustible materials e.g. colourbond iron, brick, limestone, metal post and wire. The developer will be encouraged to build Colourbond or non-combustible fences where applicable.

5.2.7 Evaporative Air Conditioners

Evaporative air conditioning units can catch fire as a result of embers from bushfires entering the unit. These embers can then spread quickly through the home causing rapid destruction. It can be difficult for fire-fighters to put out a fire in the roof spaces of homes.

It is also recommended that the owner:

- Ensure that suitable external ember screens are placed on roof top mounted evaporative air conditioners compliant with AS3959-2018 (current and endorsed standards) and that the screens are checked annually; and
- Maintain evaporative air conditioners regularly as per DFES recommendations, refer to the DFES website for further details: <http://www.dfes.wa.gov.au>

5.2.8 Bushfire Emergency Plan

A Bushfire Emergency Plan (BEP) will be prepared as part of a conditions of the Development Application (DA) stage (prior to occupancy). This defines the commitment of SACs to implement the bushfire survival plan detailing preparations and actions to take if a bushfire threatens. By compiling information, the business can be prepared for their response in a bushfire emergency. The BEP will be designed to assist the management of occupants to protect life and property in the event of a bushfire. This plan will be developed in line with ‘A guide to developing a Bushfire Emergency Plan’ (WAPC 2024) to assist with emergency management and align with the recently completed BAL Assessment and BMP Reports for the business which is a vulnerable use. The BEP will be prepared and implemented prior to occupation of the building.

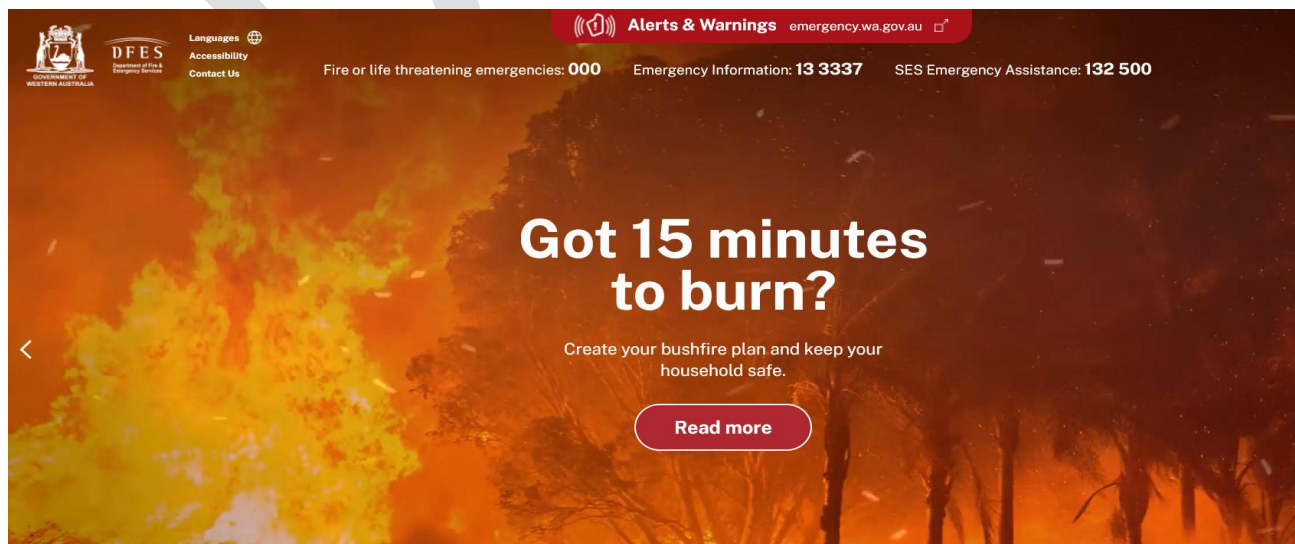


Figure 11: DFES Emergency Access Plan Home Page (DFES, 2024)

The Australian Fire Danger Ratings and Warning systems are shown below in Figure 8.

Know your Fire Danger Rating

YOUR FIRE RISK TODAY IS

BE READY TO ACT

Moderate: Plan and prepare.

High: Be ready to act.

Extreme: Take action now to protect your life and property.

Catastrophic: For your survival, leave bushfire risk areas.

➤ When there is minimal risk, Fire Danger Ratings will be set to 'No Rating'.

Find out more:
mybushfireplan.wa.gov.au

Check your rating:
emergency.wa.gov.au
or bom.gov.au/wa/forecasts/

BUSHFIRE WARNING SYSTEM

EMERGENCY WARNING
There is a threat to lives or homes.
You are in danger and need to take immediate action to survive.

WATCH AND ACT
There is a possible threat to lives or homes.
You need to leave or get ready to defend – do not wait and see.

ADVICE
A fire has started but there is no immediate threat to lives or homes.
Be aware and keep up to date.

Where can I get information during an emergency?

emergency.wa.gov.au 📞 13 DFES (13 33 37)
 @dfeswa @dfes_wa 📻 Local ABC Radio

DFES Department of Fire & Emergency Services
 AFDRS
 GOVERNMENT OF WESTERN AUSTRALIA

Figure 12: Australian Fire Danger Ratings and Warning Systems (DFES, 2024)

6 Implementation Actions

The responsibilities of the developer(s), Landowners and Local Government are shown in Table 6, 7 and 8

Table 6: Implementation actions Landowner/Developer prior to occupancy- SAC

Developer/Landowner Prior to Building or Use				
No	Implementation Action	Initial	Annual	All times
1	Install and maintain the allocated Asset Protection Zone to the dimensions and standards stated within this BMP; see Appendix B: Siting and Design Explanatory Notes, Table 9 – APZ technical requirements.	✓		
2	Ensure low fuel plantings and landscaping are implemented. Any proposed low fuel planting must be approved by the Bushfire Practitioner prior to implementation.	✓		
3	Ensure management regimes for maintenance around the building are undertaken as per this BMP, refer to Table 5, Section 5.2.3 of this report, and comply with the relevant Local Government Annual Firebreak Notice issued under S33 of the Bush Fires Act 1954.		✓	
4	Install and maintain 60,000L Strategic water tank, ensure 10m mineral earth zone is maintained around.			
5	Maintain and construct private driveways, turnaround and passing bays to the standards stated in this BMP.	✓		
6	Prepare a BEP prior to occupancy to guide all bushfire emergencies for the site.		✓	

Table 7: Implementation Responsibilities Landowner/Developer (Ongoing Management) - SAC

Landowner/Developer – Ongoing Management	
No	Implementation Action
1	Conduct regular inspections of APZ areas to ensure they
2	Maintain internal access ways, turnaround areas, and passing bays to the technical standards referenced in Figures 8 and 9 of this BMP, ensuring they remain trafficable and unobstructed year-round.
3	Maintain the firefighting water supply tanks, camlock couplings, and associated fittings in full working order. Ensure the tanks remain at capacity and that vehicle access and hardstand areas are clear and usable.
4	Ensure bushfire information signage remains visible, legible, and up to date. Replace damaged or faded signage and confirm evacuation route markers are unobstructed.
5	Comply with the SoP Bush Fire Mitigation Notice as issued under Section 33 of the Bush Fires Act 1954. Review the notice annually and implement any updated requirements.
6	Review the BEP annually prior to the bushfire season. Complete all actions contained within the “Actions Prior to the Bushfire Season” and “Actions During the Bushfire Season” sections of the BEP.
7	Ensure all personnel responsible for managing occupants during a bushfire emergency are familiar with the BEP and their roles. Conduct refresher training or briefings as needed.
8	Ensure the ongoing implementation of this BMP and associated BEP, including providing successive landowners or operators with a copy of the BMP and advising them of the responsibilities it contains.

Table 8: Implementation actions, Shire of Plantagenet (SoP)

SoP		
No	Implementation Action	Stage of approval
1	Monitor compliance with the BMP and the annual SoP Fire Compliance Notice.	Ongoing
2	Ensure that a 60,000L strategic water supply is implemented as part of the DA Approval.	Development Application
3	Driveway standards are constructed to the requirements as stated in this BMP and implemented as part of the DA approval.	Development Application
4	Ensure the BEP is conditioned as part of the DA approval for implementation prior to occupation by SACs.	Development Application

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7 Disclaimer

The recommendations and measures contained in this assessment report are based on the information available at the time of writing following the instructions of the regulatory authorities and following the requirements of the Australian Standards 3959-2018 – Building in Bushfire Prone Areas, WAPC State Planning Policy 3.7 Bushfire (WAPC, 2024a), WAPC Planning for Bushfire Guidelines (WAPC, 2024b), and applying best practise as described by Fire Protection Association Australia. These are considered the minimum standards required to balance the protection of the dwellings and occupants with the aesthetic and environmental conditions required by local, state and federal government authorities. They DO NOT guarantee that a building will not be destroyed or damaged by a bushfire, people injured, or fatalities occur either at the site or while evacuating. All surveys and forecasts, projections and recommendations made in this assessment report and associated with this proposed development are made in good faith on the basis of the information available to the fire protection consultant at the time of assessment. The achievement of the level of implementation of fire precautions will depend amongst other things on actions of the landowner or occupiers of the land, over which the bushfire consultant has no control. Notwithstanding anything contained within, the consultant/s will not, except as the law may require, be liable for any loss or other consequences (whether or not due to negligence of the bushfire consultant) arising out of the services rendered by the consultant.

AS3959-2018 disclaimer: It should be borne in mind that the measures contained within this Standard (AS3959-2018) cannot guarantee that a building will survive a bushfire event on every occasion. This is substantially due to the unpredictable nature and behaviour of fire and extreme weather condition.

Building to AS3959-2018 is a standard primarily concerned with improving the ability of buildings in designated bushfire prone areas to better withstand attack from bushfire thus giving a measure of protection to the building occupants (until the fire front passes) as well as to the building itself (AS3959, 2018).

8 Certification

I hereby certify that I have undertaken the assessment of the above site and determined the Bushfire Attack Level (s) stated in this document have been prepared in accordance with the requirements of AS 3959-2018 and the Planning for Bushfire Guidelines (WAPC, 2024b).

SIGNED, ASSESSOR: DATE: 26/02/2026

Kathryn Kinnear, Bio Diverse Solutions

Accredited Level 2 Bushfire Practitioner (Accreditation No: BPAD-30794)



9 Revision Record

Revision	Prepared By	Summary	Reviewed By	Date
Draft Id	Kathryn Kinnear	Internal QA review	Michelle Gray	28/01/2026
Draft Id	Kathryn Kinnear	Internal Technical Review	Jason Benson	29/01/2026
Draft Id	Kathryn Kinnear	Draft client review	Alexia Yacoubian	30/01/2026
Draft Id V2	Kathryn Kinnear	Updated from Client review		26/02/2026
Draft Id	Kathryn Kinnear	Peer Review	Daniel Panickar	TBC
Final Id	Kathryn Kinnear	Issued to Client as Final		

DRAFT

10 References

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11 Appendices

Appendix A: Vegetation Classes to AS3959-2018

Appendix B: Schedule 1 - WAPC Asset Protection Zone (APZ) standards to apply

Appendix C: Level 3 BPAD Peer Review

DRAFT

Appendix A

BAL Assessment to AS3959-2018

DRAFT

Vegetation classification to AS3959-2018

Site Details			
Address:	Lot 843 (No.217) and Lot 844 (No197) Moorilup Road		
Suburb:	Kendenu	State:	W.A.
Local Government Area:	Shire of Plantagenet		
Stage of WAPC Planning:	DA - Change of Use		

BMP Plan Details			
Report / Job Number:	MSC0772	Report Version:	Final
Assessment Date:	11 December 2025	Report Date:	25 February 2026
BPAD Practitioner:	Bob McGonnell (Level 1)	Accreditation No:	BPAD-58381

Vegetation Classification

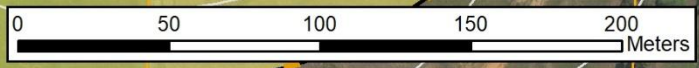
Site assessment occurred on the 11 December 2025 by Bob McGonnell (BPAD-58381). All vegetation within 150m of the site/proposed development was classified in accordance with Clause 2.2.3 of AS3959-2018. Each distinguishable vegetation plot with the potential to determine the Bushfire Attack Level is identified in the following pages and shown on the Vegetation Classes Map Page 3.

Table 1: Vegetation Classification Table (in accordance with AS3959-2018) of the Subject Site

Plot Number	Vegetation Classification	Slope (Table 2.4.3)
1	Excluded 2.2.3.2 (e)	N/A
2	Excluded 2.2.3.2 (f)	N/A
3	Class A Forest	Upslope/flat
4	Class A Forest	Downslope >0-5 degrees
5	Class G Grassland	Upslope/flat
6	Class G Grassland	Downslope >0-5 degrees



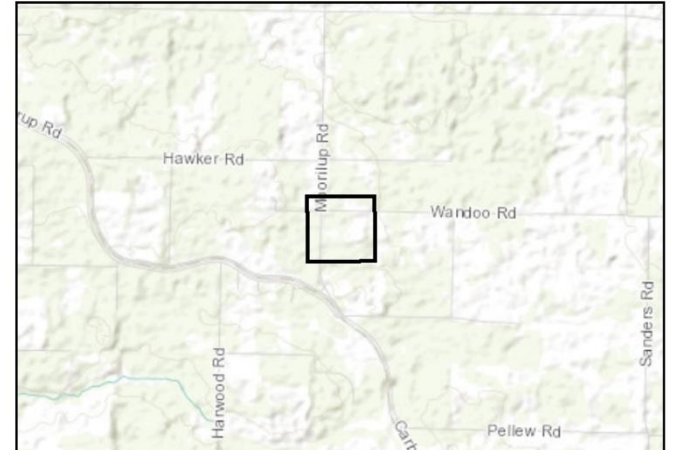
Plot Number	Vegetation Classification	Effective Slope
1	Excluded 2.2.3.2 (e)	N/A
2	Excluded 2.2.3.2 (f)	N/A
3	Class A Forest	Upslope/flat
4	Class A Forest	Downslope >0-5 degrees
5	Class G Grassland	Upslope/flat
6	Class G Grassland	Downslope >0-5 degrees



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Esperance Office:
 2A/113 Dempster Street
 Esperance, WA 6450
 (08) 9072 1382



Overview Map Scale 1:100,000

Legend

- Subject Site
 - Existing Building
 - 100m Assessment Boundary
 - 150m Assessment Boundary
 - Cadastre
 - 2m Contours (DPIRD-072)
 - Separation Distance
 - Effective Slope
 - Photo Point
 - Vegetation Classification Border Exclusion (e)
 - Vegetation Classification Border
- Classified Vegetation**
- A Forest
 - G Grassland
- Excluded Vegetation**
- Clause 2.2.3.2 (a), (b), (c) and (d)
 - Clause 2.2.3.2 (e) non-vegetated
 - Clause 2.2.3.2 (f) low threat vegetation

N
 Scale
 1:2,500 @ A3
 GDA MGA 2020 Zone 50

Data Sources
 Overview Map: World Topographic Map (Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community)
 Cadastral, Roads and Aerial Imagery Data © 2020 Western Australian Land Information Authority (Landgate)
 Location information data licensed from Western Australian Land Information Authority (WALIA) trading as Landgate. Copyright in the location information data remains with WALIA. WALIA does not warrant the accuracy or completeness of the location information data or its suitability for any particular purpose.

Client
 Southern Aboriginal Corporation c/- Planning Solutions
 Lot 843 (No.217) and Lot 844 Moorilup Road
 Kendenup WA 6323

Vegetation Classification Map		
Prepared by	Accreditation Level	Accreditation Number
BRM	1	BPAD-58381
QA Check	Drawn by	Status
KPK	BRM	FINAL
File	Date	Aerial
MSC0772	11/02/2026	May 2025


Plot	1	Classification or Exclusion Clause	Excludable - 2.2.3.2(e) Non Vegetated Areas
			<p>Location: North, northeast, east, southwest, west and northwest of the subject site.</p> <p>Description: Roads, driveways and other non-vegetated areas.</p> <p>As per exclusion clause 2.2.3.2 (e) of AS3959-2018.</p>

Photo Id 1: View facing south along Moorilup Road, located to the northwest of the Subject Site.


Plot	1 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(e) Non Vegetated Areas
			<p>Additional Photo of Plot 1.</p>

Photo Id 2: View facing west along Wandoo Road, located to the north of the Subject Site.


Plot	1 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(e) Non Vegetated Areas
			Additional Photo of Plot 1.

Photo Id 3: View facing west along driveway access, located internal to the Subject Site in the north.


Plot	1 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(e) Non Vegetated Areas
			Additional Photo of Plot 1.

Photo Id 4: View facing south along private driveway within adjoining lot, located directly adjacent to the northeast corner of the Subject Site.

Plot	2	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			<p>Location: Internal to the subject site in the north, east and southeast. External to the east, southeast and south of the subject site.</p> <p>Description: Established low threat areas within the subject site, adjoining lots, trees in single rows and other areas of low threat vegetation.</p> <p>Excluded as per AS3959 exclusion clause 2.2.3.2 (f).</p> <p>Available fuel loading: <2 t/ha.</p>

Photo Id 5: View facing southeast towards managed low threat area north of the lodge, located internal to the Subject Site in the north.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			<p>Additional Photo of Plot 2.</p>

Photo Id 6: View facing west-southwest towards managed low threat area, located internal to the Subject Site in the north.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			Additional Photo of Plot 2.

Photo Id 7: View facing southeast towards managed low threat area, located internal to the Subject Site in the north.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			Additional Photo of Plot 2.

Photo Id 8: View facing southeast towards managed low threat area, located internal to the Subject Site in the north.


Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
 <p>NE 60 90 120 SE 150 S 180 210 SW</p> <p>☀️ 136°SE (T) 📍 34°30'17"S, 117°40'34"E ±13ft ▲ 714ft</p> <p>11 Dec 2025, 10:59:41</p>			<p>Additional Photo of Plot 2.</p>

Photo Id 9: View facing southeast towards managed low threat area, located internal to the Subject Site in the north.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
 <p>NW 300 330 N 0 3 60 90 120 NE E</p> <p>☀️ 31°NE (T) 📍 34°30'17"S, 117°40'35"E ±9ft ▲ 718ft</p> <p>11 Dec 2025, 10:57:14</p>			<p>Additional Photo of Plot 2.</p>

Photo Id 10: View facing north-northeast towards managed low threat area west of the lodge, located internal to the Subject Site in the north.


Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
 <p data-bbox="92 264 919 336">NW N NE E 300 330 0 30 60 90 16°N (T) 34°30'18\"S, 117°40'35\"E ±9ft ▲ 709ft</p> <p data-bbox="702 840 901 869">11 Dec 2025, 10:50:31</p>			<p data-bbox="943 264 1225 293">Additional Photo of Plot 2.</p>

Photo Id 11: View facing north-northeast towards managed low threat area west of the lodge, located central-north of the Subject Site.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
 <p data-bbox="92 1046 919 1120">SE S SW W 120 150 180 10 240 270 300 208°SW (T) 34°30'19\"S, 117°40'37\"E ±9ft ▲ 711ft</p> <p data-bbox="702 1624 901 1653">11 Dec 2025, 10:49:32</p>			<p data-bbox="943 1046 1225 1075">Additional Photo of Plot 2.</p>

Photo Id 12: View facing south-southwest towards managed low threat area south of the lodge, located central-north of the Subject Site.



Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
  <p data-bbox="703 864 903 891">11 Dec 2025, 10:49:03</p>			<p data-bbox="943 286 1225 320">Additional Photo of Plot 2.</p>

Photo Id 13: View facing southeast towards managed low threat area, located central-north of the Subject Site.



Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
  <p data-bbox="703 1666 903 1693">11 Dec 2025, 11:40:39</p>			<p data-bbox="943 1086 1225 1120">Additional Photo of Plot 2.</p>

Photo Id 14: View facing west-northwest towards managed low threat area south of the residence, located internal to the Subject Site in the east.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			<p>Additional Photo of Plot 2.</p>

Photo Id 15: View facing southwest towards managed low threat area south of the residence, located internal to the Subject Site in the east.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			<p>Additional Photo of Plot 2.</p>

Photo Id 16: View facing northwest towards managed low threat area east of the residence, located internal to the Subject Site in the east.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			<p data-bbox="943 264 1225 297">Additional Photo of Plot 2.</p>

Photo Id 17: View facing south towards managed low threat area surrounding chalet 3, located internal to the Subject Site in the southeast.


Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			<p data-bbox="943 1046 1225 1079">Additional Photo of Plot 2.</p> <p data-bbox="943 1093 1500 1126">Note: Photo taken from a distance due to limited access.</p>

Photo Id 18: View facing east towards low threat vegetation associated with existing dwelling in the adjoining lot, located directly adjacent to the southeast corner of the Subject Site.

Plot	2 cont.	Classification or Exclusion Clause	Excludable - 2.2.3.2(f) Low Threat Vegetation
			<p>Additional Photo of Plot 2.</p> <p><i>Note: Photo taken from a distance due to limited access.</i></p>

Photo Id 19: View facing south-southwest towards low threat vegetation associated with existing dwelling in the adjoining lot, located directly adjacent to the southeast corner of the Subject Site.

Plot	3	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			<p>Location: Internal to the subject site in the east, southeast, south, northwest and central to the <i>Subject Site</i>. External to the north, west and northwest of the subject site.</p> <p>Separation Distance: 0m to lot boundary.</p> <p>Description: Forest vegetation consisting predominantly of <i>Eucalyptus wandoo</i> and <i>Eucalyptus occidentalis</i> over grassy understorey. Dense canopy in some areas with limited multilayering.</p> <p><i>Note: This plot is presented as Class B Woodland in some areas where vegetation cover is 30% or less. However, it has been classified as Class A Forest overall because total vegetation cover exceeds 30%. Precautionary Principle applied.</i></p> <p>Average vegetation height: 6-10m.</p> <p>Vegetation Coverage: 30-70% foliage cover.</p> <p>Available fuel loading: 25-35t/ha.</p> <p>Effective slope: Upslope/flat.</p>

Photo Id 20: View facing east-southeast towards forest vegetation southwest of Chalet 2, located internal to the Subject Site in the east.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			Additional Photo of Plot 3.

Photo Id 21: View facing southwest towards forest vegetation southwest of chalet 2 and northeast of Chalet 3, located internal to the Subject Site in the east.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			Additional Photo of Plot 3.

Photo Id 22: View facing south-southeast towards forest vegetation south of chalet 3, located internal to the subject site in the southeast.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
<p>167°S (T) 34°30'26"S, 117°40'42"E ±13ft ▲ 716ft</p>			Additional Photo of Plot 3.

Photo Id 23: View facing south towards forest vegetation, located internal to the Subject Site in the southeast.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
<p>73°E (T) 34°30'25"S, 117°40'36"E ±13ft ▲ 704ft</p>			Additional Photo of Plot 3.

Photo Id 24: View facing east-northeast towards forest vegetation, located internal to the Subject Site in the south.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			Additional Photo of Plot 3.

Photo Id 25: View facing west towards forest vegetation north of Chalet 3, located central-southeast of the Subject Site.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			Additional Photo of Plot 3.

Photo Id 26: View facing west towards forest vegetation, located central-northeast of the Subject Site.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			Additional Photo of Plot 3.

Photo Id 27: View facing north-northeast towards forest vegetation, located internal to the Subject Site in the north.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			Additional Photo of Plot 3.

Photo Id 28: View facing west towards forest vegetation, located internal to the Subject Site in the northwest.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			<p>Additional Photo of Plot 3.</p>

Photo Id 29: View facing northeast towards forest vegetation along Wandoo Road, located to the north of the Subject Site.

Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			<p>Additional Photo of Plot 3.</p>

Photo Id 30: View facing northeast towards forest vegetation along Moorilup Road, located to the north of the Subject Site.



Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
 <p>302°NW (T) ● 34°30'13"S, 117°40'28"E ±13ft ▲ 733ft</p>			Additional Photo of Plot 3.
			

Photo Id 31: View facing northwest towards forest vegetation, located to the northwest of the Subject Site.



Plot	3 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
 <p>217°SW (T) ● 34°30'17"S, 117°40'28"E ±9ft ▲ 724ft</p>			Additional Photo of Plot 3.
			

Photo Id 32: View facing southwest towards forest vegetation along Moorilup Road, located to the west of the Subject Site.


Plot	4	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			<p>Location: Internal to the subject site in the northeast. External to the north, northeast, southwest and west of the subject site.</p> <p>Separation Distance: 0m to lot boundary.</p> <p>Description: Forest vegetation consisting predominantly of <i>Eucalyptus wandoo</i> and <i>Eucalyptus occidentalis</i> over grassy understorey. Dense canopy in some areas with limited multilayering.</p> <p><i>Note: This plot is presented as Class B Woodland in some areas where vegetation cover is 30% or less. However, it has been classified as Class A Forest overall because total vegetation cover exceeds 30%. Precautionary Principle applied.</i></p> <p>Average vegetation height: 6-10m.</p> <p>Vegetation Coverage: 30-70% foliage cover.</p> <p>Available fuel loading: 25-35t/ha.</p> <p>Effective slope: Downslope >0-5 degrees.</p>

Photo Id 33: View facing southeast towards forest vegetation, located internal to the Subject Site in the northeast.


Plot	4 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			<p>Additional Photo of Plot 4.</p>

Photo Id 34: View facing east-northeast towards forest vegetation along Wandoo Road, located to the northeast of the Subject Site.

Plot	4 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			Additional Photo of Plot 4.

Photo Id 35: View facing southwest towards forest vegetation along Moorilup Road, located to the west of the Subject Site.

Plot	4 cont.	Classification or Exclusion Clause	Class A Forest - Low open forest A-04
			Additional Photo of Plot 4.

Photo Id 36: View facing southeast towards forest vegetation along Moorilup Road, located to the west of the Subject Site.

Plot	5	Classification or Exclusion Clause	Class G Grassland – Sown pasture G-26
			<p>Location: Internal to the subject site in the south, southwest, west and centre. External to the north, south, southwest and west of the subject site.</p> <p>Separation Distance: 0m to lot boundary.</p> <p>Description: Mixed grasses in paddock and open areas.</p> <p>Average vegetation height: 100-500mm.</p> <p>Vegetation Coverage: Some shrubs and trees present, <10% foliage cover noted.</p> <p>Available fuel loading: 4.5t/ha.</p> <p>Effective slope: Upslope/flat.</p>

Photo Id 37: View facing northwest towards grassland vegetation, located central-north of the Subject Site.

Plot	5 cont.	Classification or Exclusion Clause	Class G Grassland – Sown pasture G-26
			<p>Additional Photo of Plot 5.</p>

Photo Id 38: View facing southwest towards grassland vegetation, located central to the Subject Site.

Plot	5 cont.	Classification or Exclusion Clause	Class G Grassland – Sown pasture G-26
			Additional Photo of Plot 5.

Photo Id 39: View facing south towards grassland vegetation, located to the south of the Subject Site.

Plot	5 cont.	Classification or Exclusion Clause	Class G Grassland – Sown pasture G-26
			Additional Photo of Plot 5.

Photo Id 40: View facing north towards grassland vegetation, located to the north of the Subject Site.

Plot	5 cont.	Classification or Exclusion Clause	Class G Grassland – Sown pasture G-26
			Additional Photo of Plot 5.

Photo Id 41: View facing west-southwest towards grassland vegetation, located to the west of the subject site.

Plot	6	Classification or Exclusion Clause	Class G Grassland – Sown pasture G-26
			<p>Location: Northeast, east, southeast, south, southwest and west of the subject site.</p> <p>Separation Distance: 8m to lot boundary.</p> <p>Description: Mixed grasses in paddock and open areas.</p> <p>Average vegetation height: 100-500mm.</p> <p>Vegetation Coverage: Some shrubs and trees present, <10% foliage cover noted.</p> <p>Available fuel loading: 4.5t/ha.</p> <p>Effective slope: Downslope >0-5 degrees.</p>

Photo Id 42: View facing southeast towards grassland vegetation, located to the east of the subject site.

Plot	6 cont.	Classification or Exclusion Clause	Class G Grassland – Sown pasture G-26
			<p>Additional Photo of Plot 6.</p>

Photo Id 43: View facing north-northeast towards grassland vegetation, located to the northeast of the subject site.

Plot	6 cont.	Classification or Exclusion Clause	Class G Grassland – Sown pasture G-26
			<p>Additional Photo of Plot 6.</p>

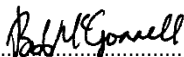
Photo Id 44: View facing west-southwest towards grassland vegetation, located to the west of the subject site.

COMMENTS ON VEGETATION CLASSIFICATIONS:

- Distances from vegetation were made based on surface fuels to edge of lot (subject site) boundary;
- Effective slopes were measured in the field using a Nikon Forestry Pro and represented on the respective plots;
- Method 1 (AS3959-2018) Simplified procedure was used for vegetation classification Assessment process;
- All vegetation was classified within the subject site and within 150m of the lot boundaries to AS3959 Table 2.3; and
- The perimeter of the vegetation was measured using field GPS and notations on field GIS maps.

CERTIFICATION

I hereby certify that I have undertaken the assessment of the above site and determined the Bushfire Attack Level stated above in accordance with the requirements of AS3959-2018.

SIGNED, ASSESSOR:  DATE: 29/01/2026

Bob McGonnell, Bio Diverse Solutions
Accredited Level 1 BAL Assessor (Accreditation No: BPAD-58381)



REVISION RECORD

Revision	Prepared By	Summary	Reviewed By	Date
Draft Id	Bob McGonnell	Internal Review	Kathryn Kinnear	29/01/2026
Final Id	Bob McGonnell	Final Issued to Client		29/01/2026



Appendix B

Schedule 1 - WAPC Asset Protection Zone (APZ) standards to apply

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Table 9: Asset Protection Zone (APZ) technical requirements

OBJECT	REQUIREMENT
Fences within the APZ	Should be constructed from non-combustible materials (for example, iron, brick, limestone, metal post and wire, or bushfire-resisting timber referenced in Appendix F of AS 3959).
Fine fuel load (combustible, dead vegetation matter less than 6 mm in thickness)	<ul style="list-style-type: none"> • Should be managed and removed on a regular basis to be maintained as low threat vegetation • Should be maintained at less than two tonnes per hectare (on average) • Mulches should be non-combustible such as stone, gravel, shells, rock or crushed mineral earth or wood mulch more than five millimetres in thickness.
Trees* (more than 6 m in height)	<ul style="list-style-type: none"> • Trunks at maturity should be a minimum distance of six metres from all elevations of the building • Branches at maturity should not touch or overhang a building or powerline • Lower branches and loose bark should be removed to a height of two metres above the ground and/or surface vegetation. • Canopy cover within the APZ should be less than 15 per cent of the total APZ area • Tree canopies at maturity should be at least 5 m apart to avoid forming a continuous canopy. Stands of existing mature trees with interlocking canopies may be treated as an individual canopy provided the total canopy cover within the APZ does not exceed 15 per cent and is not connected to the tree canopy outside the APZ. <p data-bbox="884 981 1590 1013" style="text-align: center;">Tree canopy cover – ranging from 15 to 70 per cent at maturity</p> <div data-bbox="884 1037 1668 1380" style="text-align: center;"> <p data-bbox="974 1348 1041 1372">15%</p> <p data-bbox="1243 1348 1310 1372">30%</p> <p data-bbox="1512 1348 1579 1372">70%</p> </div>



OBJECT	REQUIREMENT
Shrub* and scrub* (0.5 m to 6 m in height). Shrub and scrub more than 6 m in height are to be treated as trees.	<ul style="list-style-type: none"> • Should not be located under trees or within three metres of buildings • Should not be planted in clumps more than five square metres in area • Clumps should be separated from each other and any exposed window or door by at least 10 metres.
Ground cover*(less than 0.5 m in height. Ground cover more than 0.5 m in height is to be treated as shrub)	<ul style="list-style-type: none"> • Can be planted under trees but must be maintained to remove dead plant material, as prescribed in 'Fine fuel load' above • Can be located within two metres of a structure but three metres from windows or doors if more than 100 mm in height.
Grass	<ul style="list-style-type: none"> • Grass should be maintained at a height of 100 mm or less, at all times • Wherever possible, perennial grasses should be used and well-hydrated with regular application of wetting agents and efficient irrigation.
Defendable space	Within three metres of each wall or supporting post of a habitable building; the area is kept free from vegetation but can include ground cover, grass and non-combustible mulches as prescribed above.
Liquid petroleum gas cylinders	<ul style="list-style-type: none"> • Should be located on the side of a building farthest from the likely direction of a bushfire or on the side of a building where surrounding classified vegetation is upslope, at least one metre from vulnerable parts of a building • The pressure relief valve should point away from the house • No flammable material within six metres from the front of the valve • Must sit on a firm, level and non-combustible base and be secured to a solid structure.

Notes:

* Plant flammability, landscaping design and maintenance should be considered – refer to following explanatory notes

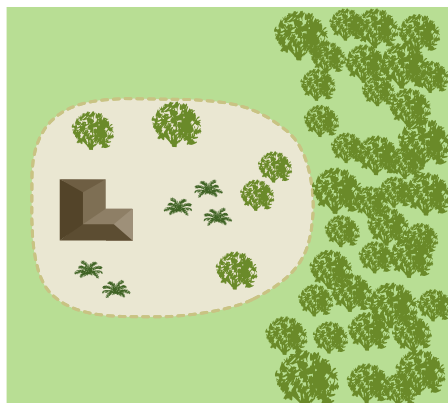
Fine fuel load is the combustible, dead or dry vegetation matter on the ground, near ground, or elevated. Fine fuel includes grass, leaves, bark and twigs less than six millimetres in diameter that ignite readily and are burnt rapidly when dry.

Fine fuel should be maintained at less than 2t/ha. 100gm/m² equates to 1t/ha. To estimate a fuel load (in t/ha), collect the dry fine fuel from a representative one square meter and weigh (in grams using kitchen scales) and multiply the weight by 0.01.

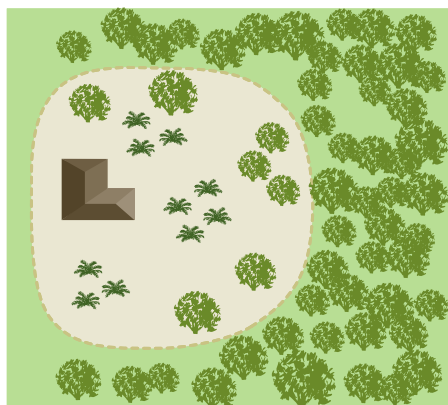


Figure 25: Design of an Asset Protection Zone

Hazard on one side



Hazard on three sides



Legend

- APZ
- trees
- shrubs

Regardless of whether an Asset Protection Zone exists in accordance with the acceptable solutions and is appropriately maintained, it should be noted that fire fighters are not obliged to protect an asset if they think the separation distance between the dwelling and vegetation is unsafe.

B.2.4 PLANT FLAMMABILITY

There are certain plant characteristics that are known to influence flammability, such as moisture or oil content and the presence and type of bark. Plants with lower flammability properties may still burn during a bushfire event but may be more resistant to burning and some may regenerate faster post-bushfire.

There are many terms for plant flammability, which should not be confused, including:

- Fire resistant** – plant species that survive being burnt and will regrow after a bushfire and, therefore, may be highly flammable and inappropriate for a garden in areas of high bushfire risk.
- Fire retardant** – plants that can absorb more of the heat of the approaching bushfire without burning, compared to more flammable plants.
- Fire wise** – plants that have been identified and selected based on their low flammability properties and linked to maintenance advice and planting location within a garden.

Although not a requirement of the Guidelines, local governments may develop their own list of fire wise or fire-retardant plant species that suit the environmental characteristics of an area. When developing a recommended plant species list, local governments should consult with ecologists, land care officers or environmental authorities to ensure the plants do not present a risk to threatened ecological communities, threatened or endangered species or their habitat.

When selecting plants, private landholders and developers should aim for plants within the APZ that have the following characteristics:

- grow in a predicted structure, shape and height
- are open and loose branching with leaves that are thinly spread
- have a coarse texture and low surface-area-to-volume ratio
- will not drop large amounts of leaves or limbs that require regular maintenance
- have wide, flat and thick or succulent leaves
- trees that have bark attached tightly to their trunk or have smooth bark
- have low amounts of oils, waxes and resins (which will often have a strong scent when crushed)
- do not produce or hold large amounts of fine dead material in their crowns
- will not become a weed in the area.

Appendix C

Level 3 BPAD Peer Review

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