



# Development Application

## Proposed Tourist Development

**Crown Lot 510 on DP 427828**

**Kerry Graham Road (formerly Willersdorf Road), Exmouth**

Prepared for Sebatikel Holdings Pty Ltd

Prepared by TBB Planning

November 2025



# Document Information



## Development Application

### Proposed Tourist Development

Sebatikel Holdings Pty Ltd

22/030

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## Acknowledgement of country



We respectfully acknowledge the Whadjuk people of the Noongar nation, as the traditional custodians of the land on which we live and work, and recognise their continuing connection.

We pay our respects to the Elders past, present and emerging for they hold the memories, the traditions, the culture and hopes that, through meaningful connection, we aim to apply to the design and planning of communities now and in the future.

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# 1.0

## Introduction

# 1.0 Introduction

TBB Planning, on behalf of our client, Sebatikel Holdings Pty Ltd, has prepared this report in support of a Development Application for a proposed Tourist Development located at Crown Lot 510 on DP 427828, Kerry Graham Road (formerly Willersdorf Road), Exmouth (the subject site).

The development application has been prepared in accordance with the provisions of the Shire of Exmouth *Local Planning Scheme No.4* (LPS 4) for determination by the Development Assessment Panel (DAP) in accordance with the *Planning and Development (Development Assessment Panel) Regulations 2010*.

Table 1 provides a summary of the proposed development.

Table 1 Development Details

Proposal	Details
<b>Zoning</b>	Tourism zone with Restricted Use R4 (subject to final gazettal of Scheme Amendment No. 11)
<b>Schedule 3 – Restricted Uses (R4)</b>	As a 'P' (permitted) use: <ul style="list-style-type: none"><li>• Tourist Development</li><li>• Hotel</li></ul> As an 'I' (incidental) use: <ul style="list-style-type: none"><li>• Reception Centre</li><li>• Recreation – Private</li><li>• Restaurant/Café</li><li>• Small Bar</li><li>• Workforce Accommodation</li></ul>
<b>Land Details</b>	Crown Lot 510 on DP 427828, Kerry Graham Road (formerly Willersdorf Road), Exmouth
<b>Construction Timeframe</b>	2 years
<b>Development Footprint and Development Envelope</b>	Total Development Envelope: 2.2874 hectares (44% of Crown Lot 510) Development Footprint: 1.0132 hectares (19% of Crown Lot 510) CHRMAP area, unavailable for development: 2.8976 hectares (56% of Crown Lot 510)
<b>Building Height (Top of Roof)</b>	13.05m AHD
<b>Number of short-stay accommodation units</b>	9 suites (including different product offerings i.e. 'deluxe', 'club' and 'pool').
<b>Number of parking spaces</b>	31 bays
<b>Amenities</b>	Restaurant, bar, pools, gym, wellness centre, par-3 golf, pickleball court and landscaping

## 1.1 Report Structure

This report describes the proposal and provides justification in respect of the planning framework. The following appendices are to be read in conjunction with this report:

- A signed copy of Shire of Exmouth Development Application Form, DAP Form 1 and a copy of current Certificate of Crown Land Title (refer Appendix A);
- Development Application Plans and Elevations (refer Appendix B);
- Landscaping Management Plan and Design (refer Appendix C);
- Transport Impact Statement (refer Appendix D);
- Environmental Management Plan (refer Appendix E);
- Bushfire Management Plan (refer Appendix F);
- Waste Management Plan (refer Appendix G);
- Stormwater, Wastewater and Drainage Management Plans (refer Appendix H);
- Flood Management Plan (refer Appendix I); and
- Line of Sight Modelling Plan (refer Appendix J).

## 1.2 Project Team

The project has been informed by extensive technical investigations undertaken by a multi-disciplinary consultant team lead by the Client, as outlined in Table 2.

Table 2 Project Team and Roles

Consultant	Role
<b>Mon Palmer</b>	Client, Project Manager, Architect, Landscape Architect, Waste Management
<b>TBB Planning</b>	Planning and Urban Design
<b>PGV Environmental</b>	Environmental
<b>Bushfire Prone Planning (BPP)</b>	Accredited Bushfire Practitioners
<b>Transcore</b>	Transport Engineers
<b>Iconic Water Solutions</b>	Wastewater & Stormwater Consultant
<b>MNG</b>	Surveying
<b>Resourceful Energy</b>	Renewable Energy Consultant

## 1.3 Project Description

The proposal seeks to deliver a distinctive, low-impact, and eco-conscious tourism accommodation development that will contribute towards a stronger and more diverse economic base for the town. The project aims to balance its economic objectives with a strong commitment to environmental sustainability, creating a tourism experience that integrates seamlessly into the natural landscape while enhancing the local character and amenity.

The vision is to provide a unique short-stay accommodation offering, described as 'simple luxury', a concept that combines comfort and quality with a minimal environmental footprint. The development will feature a collection of high-quality short-stay accommodation units.

The proposal carefully responds to the site's environmental sensitivity and proximity to Exmouth Gulf. The project aims to blend harmoniously with the rugged coastal landscape and the surrounding vistas. The structures achieve this integration by being low-level and situated thoughtfully within the site and complimented by built form elements that are sympathetic to the surrounding including natural stone, textured concrete, and rammed earth.

There is a clear and growing gap in the tourism market for high-end (luxury, upscale, and boutique) accommodation in the Shire of Exmouth. Multiple recent studies and official reports indicate that current supply is unable to meet both existing and projected demand, especially in the luxury segment. This tourist development is notably high-end, low-impact and will deliver a significant opportunity to support sustainable tourism growth and capture greater economic benefits for the region.

The project will generate local employment opportunities and contribute to the town's tourism offering, while minimising environmental and community impacts. It embraces sustainable off-grid servicing through the provision of self-sufficient water, environmentally responsible wastewater storage and disposal, and renewable energy and storage. Having regard to the limited housing in-town, the project is supported with some on-site staff accommodation.

Ultimately, the development seeks to deliver a low-impact, highly considered tourism experience that is reflective of its unique coastal setting as shown in **Figure 1** and **Figure 2**.



Figure 1 Render of entrance façade to development



Figure 2 Render of the pool club

## 1.4 Background

The Client undertook due diligence in early 2022 to identify suitable sites within Exmouth for the purpose of delivering a unique tourism offering grounded in responsible travel and sustainable design principles. The subject site was ultimately considered having regard for its distinctive and tranquil coastal setting and strong alignment with the proponent's vision to deliver high-quality, low-impact tourism accommodation.

TBB was engaged in 2022 to assist the client with navigating land tenure approvals and subsequently provide planning advice and guidance to achieve the client's vision for development. This included TBB assisting the client in obtaining a lease of Crown land, progressing an Amendment to the Shire of Exmouth Local Planning Scheme to rezone the land for tourism purposes, consistent with the purpose of the lease, and preparing this development application.

This development application represents a significant milestone for the project, following nearly three years of detailed planning, consultation, technical investigations and collaboration. Development approval will facilitate a low-impact tourism development in compliance with the zoning and scheme requirements which were specifically introduced with this proposal in mind, noting the final approval and gazettal of Amendment 11 is imminent and expected to be finalised prior to determination of this application.

Pre-lodgement consultation and ongoing liaison has been undertaken with the Shire of Exmouth and key government agencies with respect to the proposal and relevant technical aspects of the project. Relevant government Ministers have also been briefed by the Client.

## 1.5 Other Approval Processes

### 1.5.1 Crown Lease

The Department of Planning, Lands and Heritage (DPLH) granted a section 79 *Land Administration Act 1997* (LAA) lease for a term of 21 years on Crown Lot 510 on Deposited Plan 427828, commencing on the 1<sup>st</sup> November 2024, for the purpose of a "Short-Term Eco-Tourism Accommodation Facility and Event Venue" to Sebatikel Holdings Pty Ltd.

The lease has been executed and allows for the leaseholders to carry out necessary detailed planning and design investigations on-site associated with the proposed development. The Lease conditions relate to a range of relevant matters, which the leaseholder is responsible to comply with. Relevant to a development application, the lease conditions require (amongst other matters that the leaseholder: maintain the leased premises; obtain necessary approvals and permits; comply with local government bushfire notices and install firebreaks.

### 1.5.2 Scheme Amendment No.11

Scheme Amendment No.11 (SA 11) was gazetted on 24 October 2025 and rezoned Lot 510 from the 'Public Open Space' scheme reserve to the 'Tourism' zone and included Restricted Use 4 (R4). The R4 schedule contains conditions relevant to a low-impact tourism development including placement of structures, control of access and environmental management.

The development application has been prepared having due regard to the 'Tourism' zone and R4 land uses and conditions. The merits of this development application are described in detail in section 4.4 of this report.

# 2.0

## Site Details & Local Context

## 2.0 Site Details and Local Context

### 2.1 Legal Description

The development application is located on Crown Lot 510 on Plan 427828 Kerry Graham Road (formerly Willersdorf Road), Exmouth. Table 3 provides the property details and a copy of the Certificate of Crown Land Title is provided in **Appendix A**. A lease, granted to the proponent, applies over the whole of Crown Lot 510.

Table 3 Legal Description

Lot on Plan	Volume	Folio	Registered Proprietor	Lot Area
Crown Lot 510 on Plan 427828	LR3177	540	State of Western Australia with power to lease	5.185ha

### 2.2 Subject Site

The subject site is generally bound by vacant coastal vegetation north and south along the coastline, Town Beach and the Indian Ocean to the east, and land to the west is used for the Exmouth golf course with the clubhouse to the north (refer **Figure 3**).



Figure 3 Subject Site (source: MNG Access)

## 2.2.1 Development Footprint

Approximately 2.8976 hectares (56%) of the site is identified within the Shire of Exmouth's Coastal Hazard Risk Management and Adaption Plans (CHRMAP) horizontal setback datum (HSD) for the year 2123. Accordingly, development is limited to the elevated western portion of Crown Lot 510.

The development footprint occupies 1.0132 hectares, representing 19% of the total lot area of Crown Lot 510. A visual representation of the proposed development footprint is shown below in **Figure 4**. A breakdown of the development footprint and envelope in relation to the total lot size is provided in Table 4 below and illustrated in **Appendix B**.



Figure 4 3D View of proposed Development Footprint

Table 4 Development Footprint, Envelope and Total Lot Size Breakdown

Description	Area (Ha)	% of Site
Development Footprint: Firebreaks, Parking and Accessways, Infrastructure & Buildings	1.0132 hectares	19% of the site
Remainder of the development envelope	1.2742 hectares	25% of the site
<b>Total Development Envelope</b>	<b>2.2874 hectares</b>	<b>44% of the site</b>
Shire of Exmouth's CHRMAP horizontal setback datum for 2123 (non-habitable structures/facilities or easily relocatable structures only may be permitted)	2.8976 hectares retained	56% of the site
<b>Total lot area</b>	<b>5.1850 hectares</b>	<b>100% of the site</b>

## 2.3 Site Characteristics

The subject site is in proximity to the coast of the Exmouth Gulf and is situated behind a linear dunal system that runs generally parallel to the coastline. The landform is typical of coastal areas in the region, comprising predominantly sandy soils and low-lying dune systems. A detailed flora and vegetation survey was undertaken on 6 September 2023. The survey results are discussed further in section 3.6, with the Environmental Management Plan provided in **Appendix E**.

A feature survey of the subject site was undertaken in October 2023. The feature survey indicates that the western portion of Crown Lot 510 is at an elevation ranging from 7mAHD towards a north-south linear sand dune ridgeline at approximately 10mAHD, before gradually lowering in elevation towards the eastern property boundary, circa 4.5-5.0mAHD. The lower elevated areas of the site to the east provides guests with a coastal outlook towards the line of dunes along the Exmouth Gulf. The coastal dunes adjacent to Town Beach is elevated in the range of 9-10mAHD. The feature survey informed the positioning of structures and confirmed compliance with the Shire's CHRMAP coastal setbacks.

The proposed development is situated along the surveyed ridge at an elevation of 9-10mAHD and is elevated behind the 100-year horizontal setback datum, whilst the land directly east subject site nestled within the coastal dunes. The elevated nature of the site provides protection from the flood plains that have been mapped in the Exmouth townsite (for example, shown on the *Local Planning Strategy* map in Figure 6 in section 4.1).

The proposed development is positioned at different floor levels relative to the ground elevation. Proposed buildings are at 5.9m, 8.6m, 9.2m, 7.3m and 6.5mAHD. Tops of wall heights range from 10.8m, 11.6m, 12.45m, 13.05m, 9.5m, 11.0m AHD. To the immediate north, the golf clubhouse and associated structures are at levels ranging from 8.95-9.4mAHD, effectively being slightly more elevated than the proposed levels for the tourist development.

## 2.4 Local Context

The subject site is located approximately 1.4 kilometres east of the Exmouth town centre and is accessible via Willersdorf Road and Kerry Graham Road. Kerry Graham Road (formerly Willersdorf Road) is managed by the local government and provides public access to Murat Road (to the west) and the Town Beach (to the east). North-east of the subject site, an unsealed track connects the end of Kerry Graham Road through to the town beach. This track reaches elevations of 6-7mAHD and cuts through the town beach primary dune, which reaches elevations of 8-10mAHD.

Abutting to the west is the Murdoch Park Golf Course, which was established in 1969. On the northern side of Kerry Graham Road, is the southern boundary of 'Area B' of the Naval Communications Station Harold E. Holt. There is no public access into Area B, which is held in freehold by the Commonwealth of Australia.

The proposed tourist development is within relatively close proximity to key tourism attractors and community and recreational amenities within Exmouth, as listed in Table 5. Other tourism accommodation is available for a range of budgets including camping and caravanning, guest houses, and resorts, which do not compose of comparable accommodation options that this proposal will deliver.

On this basis, the proposed development has an advantage of being relatively separate from busier areas of the townsite and other uses and activities, and this will contribute to the overall guest experience in a secluded location and hence the need to deliver a low-impact, off-grid tourist development.

Table 5 Surrounding Amenities, Services and Accommodation

Category	Attractor
<b>Environmental and Educational Amenity</b>	<ul style="list-style-type: none"><li>• Cape Range National Park and Marine Park (approximately 20km south-west)</li><li>• Ningaloo Aquarium and Discovery Centre (approximately 1.3km south-west)</li><li>• Town Beach and Foreshore Reserve (250m east)</li></ul>
<b>Community and Tourist Amenities</b>	<ul style="list-style-type: none"><li>• Exmouth Town Centre (approximately 1.4km west)</li><li>• Exmouth Boat Harbour (approximately 2.8km south)</li></ul>

Category	Attractor
	<ul style="list-style-type: none"> <li data-bbox="489 226 965 256">● Exmouth Golf Club and Course (directly west)</li> </ul>
<b>Existing Tourism Accommodation</b>	<ul style="list-style-type: none"> <li data-bbox="489 323 901 352">● Ningaloo Caravan and Holiday Resort;</li> <li data-bbox="489 368 854 397">● RAC Exmouth Cape Holiday Park;</li> <li data-bbox="489 413 695 442">● Ningaloo Lodge;</li> <li data-bbox="489 458 774 487">● Exmouth Escape Resort;</li> <li data-bbox="489 503 790 532">● Potshot Hotel Resort; and</li> <li data-bbox="489 548 1171 577">● Manta rays Ningaloo Beach Resort within the Exmouth Boat Harbour.</li> </ul>

## 2.5 Native Title Determination

The Federal Court of Australia formally recognised the rights of the Yinggarda, Baiyungu and Thalanyji people as the native title holders over a combined determination area of 71,354 square kilometres. The Determination of Native Title came into effect on 17 December 2019, with the determination outcome that Native title exists in parts of the determination area (WAD 22 of 2019, WAD 366 of 2018, and WAD 261 of 2019).

Upon examination of the Determination maps, the subject site is identified within an area of the maps as ‘areas where Native Title does not exist (paragraph 2 and Schedule 4)’.

This differs to unallocated Crown Land areas to the east, which are understood to be contained within a ‘non-exclusive area’ and native title rights and interests exist as described in paragraph 6 of the Determination.

It is understood that the client has attempted to engage and meet with Traditional Owners as part of the project.

# 3.0

Development Proposal

# 3.0 Development Proposal

## 3.1 Development Overview

This application seeks approval for a ‘Tourist Development’ comprising nine (9) short-stay accommodation units, on-site facilities and amenities, as listed in **Table 6**. The proposal is designed to deliver a high-quality, low-impact visitor experience that responds sensitively to the surrounding natural environment.

The development offers a range of high-end facilities for guests, including a main pavilion building with reception, restaurant and bar areas, as well as a pool and alfresco lounge orientated to the Exmouth Gulf to the east. Additional amenities include a wellness centre with spa, sauna, plunge pools, gym, pickleball court and relaxation spaces, delivering an immersive and restorative experience for visitors. These facilities are supported by a carefully considered layout and use of natural materials that integrate the development seamlessly with the surrounding landscape.

As part of the tourism experience and offerings at Sebatikel, the proposal will host selective events (including weddings and occasional charity or culinary activities) and will accommodate a maximum of 120 patrons at any one time across the Troba evening restaurant, outdoor bar, pool club (lounges in beach sand) and wellness pavilion. Event frequency is expected to be occasional (approximately 4-5 weddings and 4-5 other events per year). Operating times will be managed to respond to guest demand and seasonal conditions within relevant approvals and may include morning, daytime and evening service periods. The Waste Management Plan and Traffic Impact Statement have been prepared to accommodate up to 120 patrons and multiple service periods across the day, noting provision of 31 car parking bays with clearly signed supplementary areas at the driveway turning circle and an overflow area for buses (post drop-off), trailers and boats so visitor bays remain available during these events. Security will be present on-site 24 hours a day, with staff and management controlling patron numbers, and the hotel will be closed to the public when an event is being held. These measures ensure operations remain low-impact and consistent with the supporting technical assessments.

Vehicle access is proposed via a single crossover from Kerry Graham Road (formerly Willersdorf Road), leading to guest and staff parking areas. A pedestrian pathway connects the parking area to the central arrival point at the main pavilion building, fostering a strong sense of arrival and orientation for guests. The individual units are accessed via low-profile concrete and crushed limestone pathways, offering privacy and intimacy while maintaining a connection to the site’s natural contours and features.

Staff accommodation, including a site manager and security quarters, is deliberately located near the northern entrance of the site, maintaining a low profile to not detract from the overall guest experience. The inclusion of workforce accommodation on site supports operational efficiency and reduces the pressure on townsite housing during peak seasonal periods when accommodation is particularly constrained.

Adjoining the workforce accommodation, key servicing infrastructure is contained within an integrated built-form sleeve, presenting as a continuous rammed-earth wall. The sleeve accommodates and effectively screens the 20ft potable water storage with enclosed generator, the 40-ft wastewater and water treatment plant, and the off-grid system. Each component is enclosed and contained ensuring noise mitigation and overall amenity is maintained for both guests and workers.

The proposed development application takes design cues from the local context of the area. The development has a strong appreciation for the region’s environmental characteristics. The architectural character is defined by the use of stabilised rammed earth, and organic textures, in a natural colour palette to minimise visual impact and harmonise with the surrounding topography.

The development has been designed to be self-sufficient in water, power, and wastewater management, and is intended to complement and support the existing accommodation and tourist offerings within Exmouth.

The proposed development details are further detailed in Table 6 below.

Table 6 Development Details

Accommodation Type	Quantity / Capacity	Area	Development Proposal
<b>Deluxe Suite(s)</b>	6 units / 12 pax	54m <sup>2</sup>	One-bedroom, one bathroom, dining, and outdoor area.
<b>Club Suite(s)</b>	2 units / 10 pax	200.6m <sup>2</sup>	One-bedroom, two bathrooms, bunk-bed nook, kitchen / dining, living, outdoor area.
<b>Pool Suite</b>	1 unit / 2 pax	203.64m <sup>2</sup>	One-bedroom, two bathrooms, kitchen / dining, living, outdoor area and pool.
<b>Workers Accommodation</b>	1 unit / 2 – 4 pax	68.37m <sup>2</sup>	Two-bedrooms, one shared bathroom, shared kitchen and storage areas.
<b>Manager's Quarters</b>	1 unit / 6 pax	219.5m <sup>2</sup>	Two bedrooms, two bathrooms, bunk beds, kitchen / dining, living, outdoor area.
Amenities & Facilities	Quantity	Area	Development Proposal
<b>Main Pavilion</b>	1	535.6m <sup>2</sup>	Reception area, lobby lounge, office, cellar, restrooms, restaurant, and services.
<b>Outdoor Seating/Terrace &amp; Bar</b>	1	324.2m <sup>2</sup>	Inclusive of outdoor terrace, seating and bar.
<b>Pool Landing / Club &amp; Pickleball Court</b>	1	261.9m <sup>2</sup>	Inclusive of pool area that is gated and paved, supported with two outdoor showers and towel storage. The pool club is supported with a pickleball court and seating.
<b>Wellness Pavilion</b>	1	402.64m <sup>2</sup>	Inclusive of a range of health and wellbeing facilities including sauna, cold plunge, two spas, gym/fitness space and restrooms.
<b>Par-3 Golf</b>	1	350m <sup>2</sup>	One putting green.
<b>Tennis Court</b>	1	168.3m <sup>2</sup>	A tennis court connected to the pool club area.

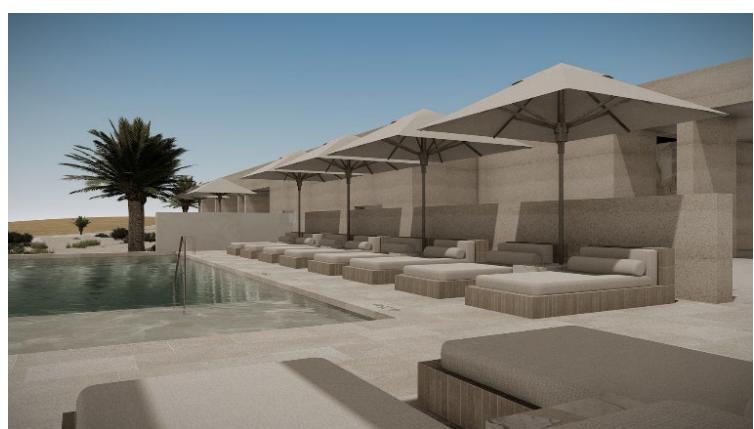


Figure 5 Renders of proposed development from various perspectives

## 3.2 Landscaping

The Landscape Management Plan (LMP) prepared by Mon Palmer is provided in **Appendix C**. The design demonstrates a clear appreciation of the site's natural features, climate, and ecological setting while enhancing the visitor experience and meeting the functional needs of the development. Located within the UNESCO-listed Nyinggulu region, the plan supports the project's commitment to environmental sensitivity and sustainable design.

Five key principles underpin the landscape approach:

1. **Low Impact** – Minimising disturbance to landform and ecological systems, retaining natural topography and vegetation, and limiting intervention to essential infrastructure, access, and bushfire management areas.
2. **Nature-Based Experience** – Preserving native vegetation for habitat continuity and natural screening, orientating built form for panoramic Exmouth Gulf and dune views, and applying dark sky lighting principles to maintain night-sky visibility and to mitigate potential impacts on local fauna species.
3. **Regenerative Practices** – Restoring vegetation and soil health through endemic planting, organic compost and biochar, sustainable water management, and closed-loop waste reuse.
4. **Community and Recreation** – Creating inclusive and flexible outdoor spaces that encourage social connection, informal gathering, and shared experiences.
5. **Connection to Place and Self** – Integrating interpretive, sensory, and contemplative spaces that promote cultural learning, environmental stewardship, and personal wellbeing.

The planting palette consists of drought-tolerant, low-fuel native and endemic species, including trees, shrubs, and groundcovers suited to Exmouth's arid coastal climate. Landscape zones are designed to support ecological resilience, bushfire protection, and a coherent visitor experience.

Landscape management measures include targeted irrigation using treated on-site wastewater, weed and pest control, low-fuel planting in Asset Protection Zones, and soil stability measures to reduce erosion risk. Monitoring will be undertaken through regular maintenance schedules, quarterly inspections, and an annual landscape audit, with the LMP reviewed biennially or after major events to ensure ongoing compliance and adaptive management.

## 3.3 Access, Circulation and Parking

### 3.3.1 Site Access & Circulation

Vehicle access to the development will be provided via a crossover from Kerry Graham Road (formerly Willersdorf Road), directing traffic south before turning west towards the main entrance.

It is understood that the state and local government requires controlled vehicle and pedestrian access from Crown Lot 510, which will be provided to/from Kerry Graham Road (formerly Willersdorf Road). The boundaries of Crown Lot 510 will be fenced in order to prevent unauthorised access into the property and, likewise, prevent informal access by guests into the adjoining Crown land and golf course.

A swept path analysis has been undertaken for a 10m waste collection vehicle and a 10m hotel shuttle bus and is provided in **Appendix D**. This swept path analysis demonstrates that there is satisfactory turning space for entry, circulation, parking and egress from the proposed development all in forward gear.

### 3.3.2 Car Parking

The proposal provides a total of 31 marked parking bays, including 2 ACROD bays, with an on-site overflow parking area to manage temporary additional demand associated with peak tourist periods and selective events. The 31 marked bays are primarily designated for visitors to ensure convenient access to the development's facilities, with ACROD and guest bays located near the principal lobby entrance to maximise accessibility.

Consistent with the visual character of the development, access areas and parking will comprise crushed and screened limestone to minimise dust and stormwater erosion.

During peak periods and selective events (noting the venue is closed to the public when an event is being held), parking will be actively managed by on-site security and staff in accordance with the Traffic Impact Statement (assessed for up to 120

patrons). Clearly signed supplementary areas will be used to maintain availability of visitor bays, including a pick-up/drop-off area at the driveway turning circle and a dedicated overflow area for bus staging after drop-off, as well as trailers and boats. Signage will direct larger vehicles to these locations.

The proposal does not provide overflow parking for the golf club, nor for residents or visitors to Town Beach, given the limited ability to control movements to these locations and the need to keep parking contained and manageable within the site.

## 3.4 Traffic

A Traffic Impact Statement (TIS) has been prepared by Transcore in support of this application and is provided in **Appendix D**.

The TIS details that the proposed development is estimated to generate a total of 238 vehicular trips per weekday, and 28 trips during the typical weekday AM peak hour, and 45 trips during the typical weekday PM hour.

The TIS confirms that access, parking and servicing by vehicles is appropriate. The traffic generated as part of the proposed development is considered negligible, and as such would not have a significant impact on the surrounding road network.

## 3.5 Waste Management

A Waste Management Plan has been prepared for the application and reflects the project's low-impact approach to development and is provided in **Appendix G**. Waste will be separated at source into organics, glass, cardboard/paper, commingled recyclables and residuals. On-site systems include an in-vessel composter that converts all food organics into soil amendment for the landscaping, a glass crusher producing sand fines for paths and bunkers, a cardboard baler, and a residuals compactor to reduce collection frequency. The ventilated, secure bin store is co-located with the service core on an impervious, graded floor with wash-down and containment features. External access and hardstand finishes are specified to minimise dust and erosion and to integrate with the site's stormwater and landscape treatments, with supplier practices geared to reduce single-use packaging.

A 10m waste collection truck would enter the site and proceed to the waste disposal/bin storage area near the wastewater treatment plant. It would then reverse and park adjacent to the bin storage. After waste collection, the truck would exit the site in forward gear.

## 3.6 Environmental Management

Having regard to the EPA's advice on Scheme Amendment 11, an Environmental Management Plan (EMP) has been prepared and is provided in **Appendix E**. The EMP outlines waste management measures and actions to minimise the impact of the proposed development on the surrounding environment (refer section 4.4.3).

### 3.6.1 Flora and Vegetation

A detailed Flora and Vegetation survey was undertaken on 6 September 2023 by PGV Environmental and is included as **Appendix E**. A total of 31 plant species were recorded during the flora survey, consisting of 28 native species and 3 introduced species. The vegetation complex mapped on the site are made up of hummock grassland with scattered acacia shrubs. There were no listed threatened or priority species recorded on the site.

### 3.6.2 Fauna

The subject site is situated in a region of high ecological significance. The Exmouth Gulf serves as a critical habitat and nursery for juvenile marine species and supports various migratory species, megafauna, and shorebirds. Notably, the area provides important foraging grounds for Green Turtles (*Chelonia mydas*), Loggerhead Turtles (*Caretta caretta*), and Hawksbill Turtles (*Eretmochelys imbricata*), with turtle nesting activity recorded on the adjacent beach during the 2022/23 breeding season. Additionally, the region is an important stopover site for migratory shorebirds that rely on the coastal environment for seasonal feeding and breeding.

The development acknowledges the environmental sensitivity of the area and will implement targeted management strategies to mitigate and manage impacts on local fauna as outlined in Section 6 of the EMP.

### 3.6.3 Light Management

Relevant to the EMP, additional line-of-site modelling has been undertaken, including importing the CAD design of the project and aligning it to the feature survey, as seen in **Appendix J**. The modelling indicates that the built form is not visible to/from Town Beach, meaning that there is no possible means of artificial light directly impacting the sands along the coast where turtles may nest.

### 3.6.4 Foreshore Management

The proponent's lease is only over Crown Lot 510 and foreshore management is not possible nor practicable to be undertaken by the proponent over land that is not subject to their control, other than fencing of the subject site to prevent uncontrolled access through to the foreshore areas. To the east, the abutting Crown Lot 511 and the town beach (including its dune system and coastal stretch of beach) are UCL and are not subject to Crown Reserves or management orders. It is not clear whether future management of the dunal system and the beach will be managed by the local government or DBCA, and therefore through this application it is not considered appropriate to have any influence or control by the leaseholder over future coastal/foreshore management by government.

## 3.7 Water Management

### 3.7.1 Stormwater Management

A Stormwater Management Plan (SWMP) has been prepared in support of this application and is provided as **Appendix H**. Recognising the water constraints of both the subject site and the broader Exmouth townsite, the proposal is designed to be entirely self-sufficient in water sourcing and to maximise the capture, treatment, and re-use of stormwater. This approach aligns with the project's broader environmental and low-impact objectives by reducing reliance on external water supplies, recharging local groundwater, and protecting the receiving environment from erosion and sedimentation.

The stormwater strategy integrates water sensitive urban design (WSUD) principles, consistent with the site's low-impact design approach and tourism model.

The SWMP identifies eight distinct catchment areas for stormwater collection, supported by four gravel-lined bioswales and two natural swales as outlined in **Table 7** below and illustrated in **Appendix H**.

Table 7 Catchment Areas & Swales

Catchment Area	Total Size	Swale Type
A	9,067 m <sup>2</sup>	Bioswale 4
B	3,058 m <sup>2</sup>	N/A
C	9,102 m <sup>2</sup>	Bioswale 3
D	2,731 m <sup>2</sup>	Bioswale 2
E	4,520 m <sup>2</sup>	N/A
F	4,348 m <sup>2</sup>	Bioswale
G	8,585 m <sup>2</sup>	Natural Swale 1
H	9,768 m <sup>2</sup>	Natural Swale 2

The bioswales are strategically located along the main pedestrian walkways, each measuring approximately 3,000 mm wide, 250 mm deep, and featuring a 500 mm invert width. The channel base will be gravel-lined and graded to ensure even flow distribution and efficient drainage during rainfall events. Planted with low-maintenance native and endemic species, these bioswales will treat and infiltrate stormwater and contribute to the resort's landscaped amenity, reinforcing its low-impact nature-based character.

The natural swales will follow existing low-lying contours to capture and convey overland flow. These will be stabilised with native groundcovers and, where necessary, additional rock or gravel armouring to minimise erosion. Together, the bioswales and natural swales form an integrated drainage network that complements the site's landscape design, supports local biodiversity, and maintains the visual and ecological integrity of the development surroundings.

In addition to swale-based stormwater management, the development incorporates a large-scale rainwater harvesting system. The system captures runoff from a total roof area of 1,821 m<sup>2</sup>, with an estimated annual rainfall volume of 495,520 litres. The rainwater tank is designed with a capacity of 496,000 litres, providing a sustainable water source for non-potable uses such as landscape irrigation. Separately, the proposal will have 2 x 50,000 litre water tanks dedicated for firefighting in accordance with bushfire management requirements, refer Section 3.10.

### 3.7.2 Waste Water Management

A combined wastewater and water treatment system is proposed, contained within a 40-foot modular unit, to manage and treat water on-site (refer **Appendix G**). This reverse osmosis system will operate in conjunction with the broader water management strategy, supporting the sustainable reuse of treated water and ensuring compliance with environmental and health standards. The site also includes leach drains, as shown in **Appendix H**, to allow for the controlled dispersal of treated wastewater into subsurface soils. These will be positioned and designed to avoid contamination of stormwater systems and to operate in conjunction with the broader water management strategy.

## 3.8 Flood Management

A Flood Management Plan (FMP) has been prepared in support of this Development Application and is provided in **Appendix I**. While the site is not located within a declared floodplain, the FMP identifies potential risks associated with intense rainfall and overland flows, given the site's topography and regional climate.

The FMP outlines a suite of preventative, monitoring, and emergency response measures designed to ensure the safety of guests, staff, and infrastructure during heavy rainfall or flooding events. This includes procedures for early warning, evacuation, and recovery, as well as on-site mitigation strategies such as temporary barriers, landscape grading, and drainage management.

The measures set out in the FMP incorporates guidance from the Department of Fire and Emergency Services (DFES) and are consistent with best-practice flood risk management and demonstrate that the development can be safely and responsibly managed in accordance with relevant planning and emergency service requirements.

## 3.9 Contaminated Sites

'Area B' of the Naval Communication Station Harold E. Hold is registered as a contaminated site (remediated) on the DWER Contaminated Sites database. This matter was raised in the advertising period of the Scheme Amendment 11, by DWER.

Online information from the DWER Contaminated Sites database states that the site was contaminated due to historical use of firefighting foam containing PFAS from the 1970s to the mid-2000s.

Online information indicates that the Federal Government has remediated their site. Having regard to the Department of Defence's publicly available reports from the PFAS investigation and management program for Areas A and B, the detailed site investigation findings determined that PFAS posed a "low exposure risk to people in the investigation areas".

Relevant to the subject site, the investigation areas are mapped surrounding the 'Area A' Very Low Frequency (VLF) antenna (located approx. 10-11 km north of the subject site), and an investigation area around the Naval Base (approx. 4 km north of the subject site). Given the distance of these investigation areas for PFAS, it is considered that there is negligible risk in respect of this proposal.

## 3.10 Bushfire Management

The subject site is wholly identified as 'Bush Fire Prone' on the DFES Map of Bush Fire Prone Areas. In accordance with the requirements of *State Planning Policy 3.7 – Bushfire* and the Planning for Bushfire Guidelines, a Bushfire Management Plan (BMP), supported by a Bushfire Emergency Plan (BEP) is provided in **Appendix F**. The BMP adopts a siting, landscaping, access, water and operational framework that enables all habitable buildings to achieve BAL-29 or less.

Asset Protection Zones (APZs) will be established around all habitable buildings and maintained in perpetuity to support the BAL outcomes. The BMP and BEP have been developed in conjunction with the landscaping design, applying a low-fuel, drought-tolerant approach using endemic species, strategic non-vegetated surfaces, and targeted irrigation to maintain a “low threat” condition. External materials and detailing are selected to minimise fuel accumulation and ember lodging while remaining consistent with the project’s low-impact, nature-based design intent.

Safe access and egress are provided via the public road network with an all-weather crossover and internal driveways designed to emergency-vehicle standards, including compliant turn-around facilities. Wayfinding, gates and parking areas are arranged to remain unobstructed during emergency operations and to support early evacuation when required. The client has facilitated an emergency access arrangement with the local government.

The development is supported with two 50,000 litre water tanks dedicated for firefighting, in addition to the 496,000L tank provided on the site (refer **Appendix B**). The water tanks will be above-ground, non-combustible, with compliant fittings and accessible hardstand in accordance with the measures outlined in the BMP. Where potable and firefighting supplies are co-located, reserve volumes will be protected to ensure availability during an incident. Pumps and valves will be positioned for safe access and, where required, supported by independent power to ensure reliability during grid interruptions.

Prior to occupation, the proponent will install APZs, complete internal access and turning areas to the required standards, and commission the firefighting water supply. Ongoing compliance will be managed by a nominated site manager through routine maintenance schedules, quarterly inspections and an annual pre-season audit, with the BMP, BEP and LMP reviewed following major events or at least biennially.

### 3.10.1 Bushfire Emergency Plan

Operationally, the BEP sets seasonal preparedness, staff training, visitor information and real-time monitoring procedures. The operational posture is to evacuate early, with closure on days forecast as Extreme or Catastrophic, and clear triggers to pause or scale operations during elevated risk. Evacuation routes, assembly points and roles and responsibilities are defined, and pre-arrival and on-site communications ensure guests understand procedures.

### 3.10.2 Firebreak Variation Approval

The Shire granted approval for a variation to its s.33 Firebreak Notice for Lot 510 as provided in **Appendix F**. The variation allows for the site’s internal emergency-access network and Asset Protection Zones (APZs) to function as the firebreak, rather than a continuously cleared boundary strip, consistent with the measures outlined in the BMP/BEP. This ultimately achieves the same safety outcome; continuous appliance access and defensible space close to assets while avoiding unnecessary boundary clearing, aligning with the project’s low-impact landscape strategy. As part of the variation, the southern firebreak will extend east to connect to the existing access road and be gated with a universal emergency-services code. The variation does not reduce obligations: APZs, internal access and firefighting water must be installed before operation and maintained in perpetuity under the BMP/BEP and enforceable s.33 mechanisms.

## 3.11 Workforce Accommodation

It is acknowledged that during peak tourism seasons, demand for visitor accommodation places significant pressure on the town’s utilities, amenities and facilities, with the population often doubling or tripling. This creates increased demand for housing, particularly for itinerant workers and visitors, and can reduce availability for local residents.

To address these pressures, the proposal includes incidental workforce accommodation to support operations on-site, which is essential to delivering a high-quality, full-service visitor experience, with the further ability for staff to respond promptly to security matters and emergency situations, ensuring the safety and comfort of guests at all times.

This provides the advantage of minimising a burden on the existing housing stock within town. The small-scale workforce accommodation is reflective of it only being available for on-site staff, and is not intended to operate as workforce accommodation for other industry sectors.

# 4.0

## Planning Framework

## 4.0 Planning Framework

## 4.1 Shire of Exmouth Local Planning Strategy

The Shire's *Local Planning Strategy* (LPS) identifies the local government's vision and strategic intentions for the next 15 years. The LPS identifies the subject site as category 1 for 'Future Tourism', as per **Figure 6**. The strategy depicts the golf course to the west, the coastal foreshore to the east, and the Defence site to the north.

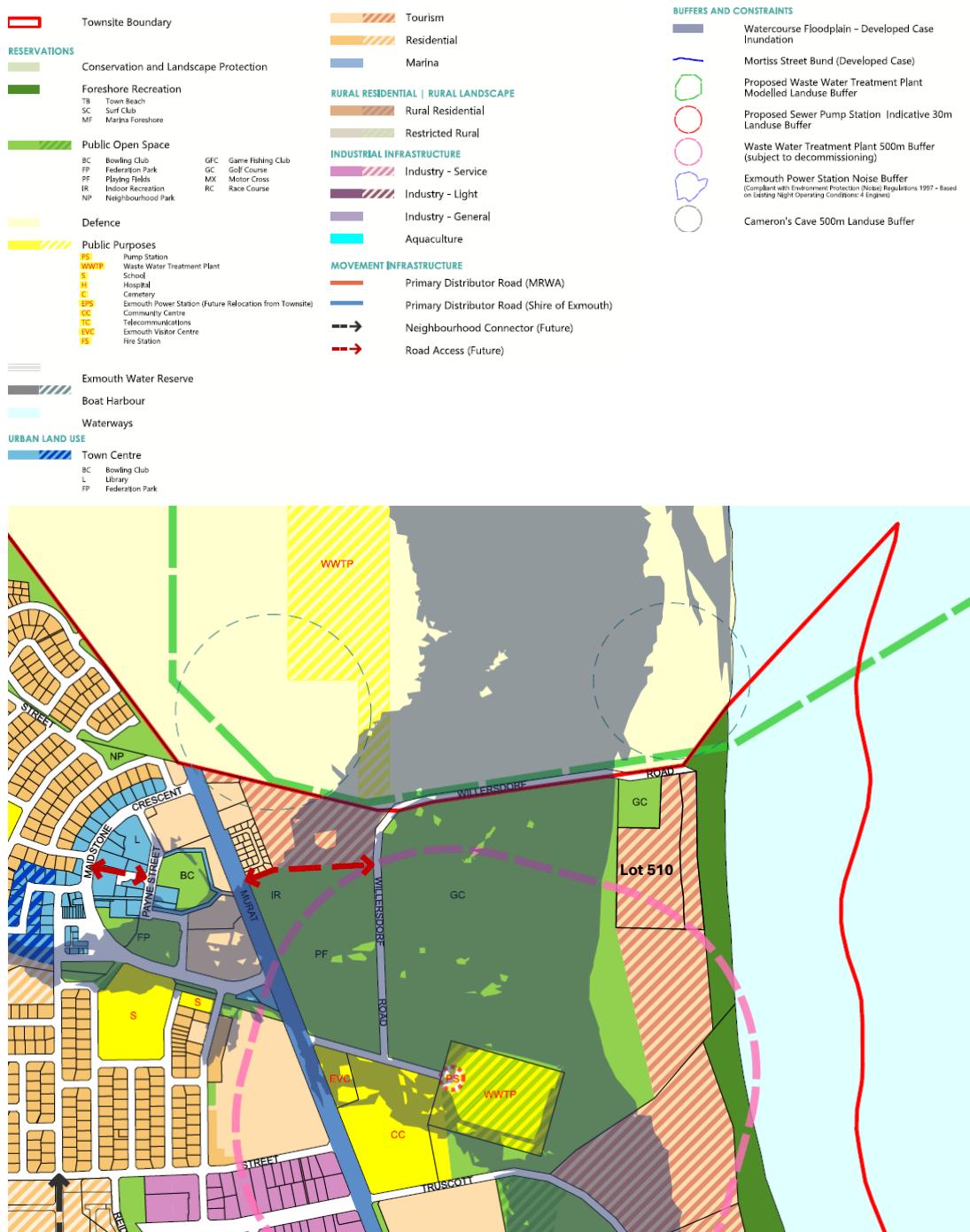


Figure 6 Extract of Local Planning Strategy. Lot 510 cadastral boundaries are shown for additional clarity.

The proposal is assessed against the Strategic objective for 'Tourism', outlined in **Table 8** below.

Table 8 Local Planning Strategy - Tourism Objective

Objective	Comment
<i>Encourage the sustainable growth of tourism and tourism related opportunities throughout the Shire and balance growth against the conservation values of the environment upon which the area's tourism industry is based.</i>	<ul style="list-style-type: none"><li>There is a clear and growing gap in the tourism market for high-end (i.e. boutique and luxury) accommodation within the Shire of Exmouth. Multiple recent studies and official reports indicate that the current supply is unable to meet both existing and projected demand, especially in the luxury market segment. Industry analysis and stakeholder feedback consistently highlights that the development of high-end accommodation is one of the largest opportunities in Exmouth's tourism sector. In this regard, this proposal works to address a clear shortfall of high-end accommodation within the locality.</li><li>The proposal incorporates environmentally sustainable design and features, reflected in its eco-sensitive design, renewable energy use, and minimal land disturbance. This boutique development is designed to be integrated with the natural environment, promoting conservation rather than significant alteration to the local characteristics of the area. This ensures the design minimises environmental degradation and pressure on local infrastructure.</li><li>The proposal is aimed at partnering with local businesses including through construction and operational aspects, ensuring economic benefits remain in the community.</li></ul>

## 4.2 Exmouth Townsite Structure Plan

The *Exmouth Townsite Structure Plan* was approved by the WAPC on 19 September 2011. The Structure Plan addressed broad land use and infrastructure matters to establish general principles to guide development.

Section 4.3.1 – *Tourism* of the Structure Plan identified that tourism was the most significant economic contributor to the region, and was the key facet to the town's function and character. The Structure Plan considered that providing more quality accommodation was a primary intention for the future planning of the townsite. It considered that, by providing more high-quality accommodation and mid-tier accommodation, the townsite will have greater capability to attract international and interstate visitors, which in turn will provide for more reliability associated with regular air services. This was a key consideration particularly to help sustain the tourism economy.

The proposed development is aligned with the planning intent of the *Exmouth Townsite Structure Plan*, facilitating the future development of high-quality, low-impact tourist accommodation, that has the ability to provide an attractive luxury alternative to other forms of tourism accommodation currently available within the town site and the region.

## 4.3 Shire of Exmouth Town Centre and Foreshore Revitalisation Plan

The *Town Centre and Foreshore Revitalisation Plan* aims to guide the enhancement of the foreshore reserve to improve existing facilities and assets, quality of infrastructure and improve linkages and access between key sites.

Crown Lot 510 is positioned west of the Foreshore and Open Space project area that is identified in the *Revitalisation Plan*. This is annotated for clarity and the subject site is depicted by a yellow property boundary shown in **Figure 7**. The area adjacent to the subject site is primarily outlined for enhancement to the cycle and pedestrian network, improved seating, viewing platforms, shelter and beach access from the unsealed path connecting to Kerry Graham Road (refer **Figure 7**).

The proposed development has consideration for the proposed foreshore enhancement adjacent to the site. The Revitalisation Plan complements the proposed development, by improving foreshore amenity and accessibility in close proximity to the site. Notably, the Restricted Use conditions require fencing of the subject site to prevent uncontrolled access through to the foreshore areas.



- 13. Existing foreshore trail upgrade
- 14. Beach access and shelters
- 15. Potential development of Golf Club
- 16. Secondary viewing platform to Gulf including interpretive trail and beach access

Figure 7 Annotation of the Crown Lot 510 boundary overlaying the Revitalisation Plan

## 4.4 Shire of Exmouth Local Planning Scheme No. 4

### 4.4.1 Zoning

The subject site is currently zoned 'Public Open Space' under LPS 4. Through Scheme Amendment 11, the subject site is proposed to be rezoned to 'Tourism'. The details of Scheme Amendment 11 are provided in section 1.5.

The proposal is consistent with the objectives of the 'Tourism' zone as outlined in **Table 9** below.

Table 9 Tourism Zone objectives

Objective	Comment
<i>To promote and provide for tourism opportunities.</i>	<ul style="list-style-type: none"> <li>• The proposed development is bespoke and unique to other tourism accommodation uses within the Exmouth townsite with a vision to be eco-conscious and low impact having regard to the location and site characteristics.</li> <li>• Scheme Amendment 11 is designed to facilitate low-impact tourist development on the subject site. The conditions contained in the restricted use 4 for the subject site ensure development will not detrimentally impact on the locality.</li> <li>• The proposal provides a unique style of luxury short stay accommodation that encourages tourism experience to Exmouth that adds to the area's competitive advantage.</li> </ul>
<i>To provide for a variety of holiday accommodation styles and associated uses, including retail and service facilities where those facilities are provided in support of the tourist accommodation and are of an appropriate scale where they will not impact detrimentally on the surrounding or wider area.</i>	
<i>To allow limited residential uses where appropriate.</i>	<ul style="list-style-type: none"> <li>• The development does not propose permanent residential within the tourist development; however, offers workforce accommodation as a component of the facilities on-site for the management of the development.</li> </ul>
<i>To encourage the location of tourist facilities so that they may benefit from existing road services, physical service infrastructure, other tourist attractions, natural-features and urban facilities.</i>	<ul style="list-style-type: none"> <li>• The proposed development will be supported by complementary facilities (including a restaurant, small bar, day spa, and incidental tourism workforce accommodation) and will support growth of tourism and related opportunities on land that has been identified for future tourism purposes.</li> </ul>

## 4.4.2 Land Use

To appropriately respond to the environmentally sensitive and low-impact nature of the proposed development, the full range of land uses permissible under the ‘Tourism’ zone was considered too broad for the subject site. As such, SA11 inserted ‘Restricted Use (R4)’ designation within Schedule 3 of the Scheme text, applied in conjunction with the ‘Tourism’ zoning. The proposed land uses are consistent with those contemplated through Scheme Amendment 11 for the ‘Tourism’ zoning with the Restricted Use R4, as outlined in Table 10. In this regard, the proposal is capable of being favourably considered in context to being deliberately designed to address the Restricted Use R4 uses and conditions.

Table 10 Restricted Land Uses

Restricted Land Use	Definition	Permissibility	Description
<b>Hotel</b>	means premises the subject of a hotel licence other than a small bar or tavern licence granted under the <i>Liquor Control Act 1988</i> including any betting agency on the premises	‘P’	The ‘Hotel’ land use is included where necessary to align with the provision of a future Hotel liquor licence. It is understood the Hotel and Tavern liquor licence(s) would cover the operational components including the restaurant, room service, bar and related events.
<b>Reception Centre</b>	means premises used for hosted functions on formal or ceremonial occasions.	‘I’	The proposal seeks to host selective events and functions (e.g. weddings), with capacity for up to 120 attendees. Event frequency is expected to be occasional (approximately 4-5 weddings and 4-5 other events per year). Operating times will be managed to respond to guest demand and seasonal conditions within relevant approvals and may include morning, daytime and evening service periods.
<b>Recreation - private</b>	means premises that are — used for indoor or outdoor leisure, recreation or sport; and not usually open to the public without charge.	‘I’	The proposal includes an on-site day spa facility inclusive of a sauna, plunge pools, gym and a pickleball court. Depending on the operational arrangements, the day spa may be for exclusive use of guests, or alternatively could also be available to external customers.
<b>Restaurant/Café</b>	means premises primarily used for the preparation, sale and serving of food and drinks for consumption on the premises by customers for whom seating is provided, including premises that are licenced under the <i>Liquor Control Act 1988</i> .	‘I’	The proposal includes an on-site restaurant. Depending on the operational arrangements of the tourist development, the restaurant may be for the exclusive use of guests or, alternatively, could also be available to external customers.
<b>Small bar</b>	means premises the subject of a small bar licence granted under the <i>Liquor Control Act 1988</i> .	‘I’	The proposal includes an on-site outdoor/indoor bar. Depending on the operational arrangements of the tourist development, the bar may be for the exclusive use of guests or, alternatively, could also be available to external customers.
<b>Tourist Development</b>	means a building, or group of buildings forming a complex, other than a bed and breakfast, a caravan park or holiday accommodation, used to provide — short-term accommodation for guests;	‘P’	The design of the integrated proposal comfortably fits the definition of ‘Tourist Development’, as it provides short-term accommodation to guests as well as on-site amenities and facilities that would be expected as part of a high-end tourism offering including health and wellness,

Restricted Land Use	Definition	Permissibility	Description
	onsite facilities for the use of guests; and facilities for the management of the development.		restaurant and bar, a variety of rooms, on-site recreational activities for guests, and an outdoor swimming pool.
<b>Workforce Accommodation</b>	means premises, which may include modular or relocatable buildings, used — primarily for the accommodation of workers engaged in construction, resource, agricultural or other industries on a temporary basis; and for any associated catering, sporting and recreation facilities for the occupants and authorised visitors.	'I'	The proposal includes limited accommodation on-site specifically for employees of the tourist development. The inclusion of a select number of beds on-site for workers assists with the security and operational efficiency of the facility, without placing additional demand upon the existing housing stock in Exmouth.

#### 4.4.3 Restricted Use 4 (R4) Conditions

The Restricted Use (R4) applies to Crown Lot 510, which lists the restricted uses that can be considered on-site, and conditions are included that pertain to the development that can occur on-site. Relevant to this development application, the R4 conditions have been addressed in **Table 11** below.

Table 11 Restricted Use Provisions

Condition	Proposed Response / Management
1. The purpose is to facilitate a low impact tourism development.	<b>Compliant.</b> The project vision seeks to deliver a low-impact development. This vision has been achieved through the careful consideration of the site selection, the development footprint only covering 19% of the total lot area, locally sourced materials, self-sufficient water and energy infrastructure.
2. Sensitive land uses to be setback 500m from the Water Corporation waste-water treatment plant.	<b>Compliant.</b> The accommodation is located beyond the 500m buffer to the Waste Water Treatment Plant.
3. Habitable structures to be setback behind the 100-year horizontal setback datum.	<b>Compliant.</b> The Shire's CHRMAP assessment has been given due consideration in determining the lease area and development envelope within Crown Lot 510. All habitable structures are located beyond the 100-year horizontal setback datum as demonstrated in Appendix B. Easily relocatable and non-habitable structures and facilities may be considered at or ahead of the 100-year horizontal setback datum (i.e., landscaping, par 3 golf).
4. Vehicle access to be obtained from Kerry Graham Road only. Vehicle access to the coast to be controlled via existing access from Kerry Graham Road to Town Beach.	<b>Compliant.</b> The proposed development proposes vehicle and pedestrian access from the northern lot boundary to Kerry Graham Road. The site boundaries are proposed to be fenced. A benefit of fencing the property is that it further encourages guests to use the proposed access to Kerry Graham Road. These measures are outlined in the Environmental Management Plan provided in Appendix E.
5. Preparation of an Environmental Management Plan, in consultation with the Department of Biodiversity, Conservation and Attractions and to address the following matters:	<b>Compliant.</b> An Environmental Management Plan was prepared by PGV Environmental addressing the development conditions adopted under SA11 in consultation with the DBCA.

Condition	Proposed Response / Management
<p>6. Line of sight modelling of the proposed development, to determine from what locations direct and indirect light would be visible from the Town Beach to the development site. Any portion of a building with line of sight to/from the beach shall be designed to restrict artificial light emission to the satisfaction of the Department of Biodiversity, Conservation and Attractions;</p> <p>7. If required as a result of the line of sight modelling findings development would be visible from the Town Beach to the development site, a Lighting Management Plan to be prepared to the satisfaction of the local government in consultation with the Department of Biodiversity, Conservation and Attractions in accordance with the Environmental Assessment Guideline for Protecting Marine Turtles from Light Impacts (EPA 2010) (or as updated) and the Commonwealth Light Pollution Guidelines for Wildlife – Including Marine Turtle, Seabirds and Migratory Shore birds (Department of the Environment and Energy and Department of Biodiversity, Conservation and Attractions, 2020) or as updated) to ensure protection of marine turtle habitats;</p> <p>8. In general, lighting for the development to be designed in accordance with dark sky principles;</p> <p>9. Control of access to and from the site;</p> <p>10. Five-year periodical review of the Management Plan as required, in consultation with the Department of Biodiversity, Conservation and Attractions.</p>	<p>Line of Sight (LOS) modelling has been prepared by TBB Planning as outlined in section 3.6.3 and provided in <b>Appendix J</b>. The LOS modelling demonstrates the proposed development will not be visible from Town Beach.</p> <p>Based on the findings from the LOS modelling, a basic lighting management plan could be prepared and submitted with a building permit, when the full electrical design and lighting design is available. It is considered that light emission from the development cannot reach the Town Beach sand surface, due to the low-profile of the built form, and the existence of the dune between the proposal and the beach itself. Section 6.6 of the EMP outlines further mitigation practices to be undertaken by the lighting design.</p> <p>It is considered that details of lighting can be provided in detailed plans submitted for a building permit.</p> <p>Controlled access to the site is facilitated through the formal access proposed to Kerry Graham Road, and the proposed fencing of the subject site.</p> <p><i>Section 6.7 – Adaptive Management</i> of the EMP outlines that the EMP will be reviewed every five-years in consultation with the DBCA with an annual review of environmental impacts and updates to management as required.</p>

#### 4.4.4 General Development Requirements

Part 4 of the scheme outline the general site and development requirements for any development application. The current proposal has been evaluated against these provisions, as detailed in Table 12 below.

Table 12 General Development Requirements

Scheme Requirement	Compliance
<b>Clause 4.11- Workforce Accommodation</b>	
4.11.1 A Workforce Accommodation unit may take the form of a self-contained unit, mining camp-style unit or caravan.	<p><b>Compliant.</b></p> <p>The layout functions as a contained unit arrangement comprising individual lockable rooms with shared kitchen/living and bathroom within the workforce building.</p>
4.11.2 Each Workforce Accommodation unit shall contain no more than one (1) bedroom.	<p><b>Compliant.</b></p> <p>The workforce accommodation is incidental in nature and is proposed as two single-bedroom units, capable of accommodating one staff member per unit.</p>
4.11.3 Workforce Accommodation that contains more than one unit shall be centrally managed as a single complex.	<p>The two units are centrally managed as part of the tourist development's operations and are not available to external industries or the public.</p>
4.11.4 No directional signs associated with Workforce Accommodation shall be permitted.	<p><b>Compliant.</b></p> <p>No external or wayfinding signage specific to workforce accommodation will be installed.</p>

Scheme Requirement	Compliance
4.11.5 <i>Laundry, sanitary and ablution facilities shall be provided or accessible within the lot.</i>	<p><b>Compliant.</b></p> <p>Sanitary/ablution facilities are provided within the building. Laundry facilities will be provided within the lot via the site's service laundry.</p>
4.11.6 <i>A management statement is required to be submitted with a Development Application for Workforce Accommodation. The management statement shall be prepared, and approved to the satisfaction of the local government. The management statement shall be clearly displayed in the Workforce Accommodation. The management statement shall detail — (a) maintenance; (b) site access; (c) emergency management; (d) security; and occupant rules.</i>	<p><b>Compliant.</b></p> <p>The required management information will be incorporated into the site's information package issued to all guests and workers. The management statement will be displayed within the Workforce Accommodation, detailing maintenance, site access and emergency management, security, and clear occupant rules.</p>
4.11.7 <i>Workforce Accommodation shall have external colours consistent with the local government's adopted colour palette.</i>	<p><b>Compliant.</b></p> <p>Refer section 4.5.1.</p>
4.11.8 <i>Pursuant to clause 67 of the deemed provisions, Development Approval granted for Workforce Accommodation shall be valid for a maximum period of 3 years, except where the Workforce Accommodation is a caravan, approval is valid for a maximum period of 4 months.</i>	<p><b>Variation sought.</b></p> <p>The application is for a tourist development to which tourism is the predominant use. To ensure the tourism development can operate properly, a small component is proposed as workforce accommodation. When considering clause 4.11.8, it is considered that the Scheme is contemplating a more stand-alone workforce accommodation proposition and, therefore, a variation is sought that no time limit is applied to this component of this particular project given the workforce accommodation is incidental to the tourism use.</p> <p>The development incorporates dedicated workforce accommodation to ensure the continuous presence of staff on-site. This is essential to delivering a high-quality, full-service visitor experience, with 24-hour access to staff for guest support. On-site accommodation also enables staff to respond promptly to security matters and emergency situations, ensuring the safety and comfort of guests at all times.</p>
<p><b>Clause 4.26- Parking Requirements</b></p> <p><b>4.26.1 Hotel; Motel; Tourist Development</b></p> <ul style="list-style-type: none"> <li>○ <i>One (1) space for every bedroom.</i></li> <li>○ <i>One (1) visitor space per twenty (20) bedrooms.</i></li> <li>○ <i>One (1) additional bus space for every 40 persons which may be accommodated.</i></li> <li>○ <i>One (1) additional space for every two (2) staff members.</i></li> <li>○ <i>One (1) space for every four (4) seats in dining area if open to the public.</i></li> <li>○ <i>One (1) space for every 6m<sup>2</sup> of bar area if open to the public.</i></li> </ul>	<p><b>Compliant.</b></p> <p>The development proposes 31 marked parking bays plus an on-site overflow area.</p> <ul style="list-style-type: none"> <li>○ 13 bays required for the 13 bedrooms proposed (incl. workers);</li> <li>○ 1 visitor bay as there is less than 20 bedrooms proposed;</li> <li>○ Overflow parking area supports additional bus spaces for events of up to a maximum of 120 people;</li> <li>○ 2 bays required for up to a total of 4 staff;</li> <li>○ 6 bays required for the 22 dining seats proposed; and</li> <li>○ 8 bays required for the approximate 47 m<sup>2</sup> of bar area (excluding the outdoor terrace/seating).</li> </ul> <p>Based on the above, the parking requirements total 29 bays + 1 visitor bay, with 3 bus spaces required during special events (up to 120 guests).</p> <p>The proposal includes 31 marked bays to meet day-to-day demand with a one-bay surplus (inclusive of the visitor bay). The overflow area will operate for peaks and accommodate three buses and cars towing boats, with dedicated space for larger vehicles. Parking and access are further detailed in the TIS (Appendix D).</p>

## 4.4.5 Tourism Zone – Site & Development Requirements

Clauses 3.10.4.2 and 3.10.4.3 of the scheme outline the site and development requirements for proposals within the ‘Tourism’ zone. The current proposal has been evaluated against these provisions, as detailed in Table 13 below.

Table 13 LPS4 Site and Development Requirements

Scheme Requirement	Compliance
<b>Clause 3.10.4.2 Site Requirements</b>	
<p>a) Setbacks —</p> <p>(i) For short-term accommodation and residential development – in accordance with the R40 Density Code.</p> <p>(ii) For uses other than short-term accommodation and residential development, as determined by the local government.</p>	<p><b>Compliant.</b></p> <p>It is clear that the short-stay accommodation units are not designed as if they are residential dwellings. For the purposes of addressing the specific wording of the scheme requirement, the ‘setbacks’ have been examined in terms of considering what would typically be required under the R-Codes, and hence the proposal achieves compliance.</p> <p>The proposal complies with the minimum setbacks, as the buildings are setback within a range of 10.88m to 18.96m from the lot boundary to the golf course.</p> <p>Clause 3.4.1, Part C of the R-Codes provides minimum boundary setbacks of 1-3m, depending on the height of the walls. For the purposes of working out the setback, the layout of the short-stay accommodation units would loosely correlate with separate, detached buildings that would most closely align with the definition of ‘grouped dwellings’ under the R-Codes. Part C of the R-Codes applies requirements for grouped dwellings in areas coded R30 and above.</p> <p>Workforce Accommodation – this is not short-term or residential in nature and can be determined by the local government accordingly.</p>
<p>b) Lot Sizes —</p> <p>(i) For short-term accommodation and residential development – in accordance with the R40 Density Code.</p> <p>(ii) For uses other than short-term accommodation and residential development, as determined by the local government.</p>	<p><b>Not applicable.</b></p> <p>The subject site is Crown Land and is leased to the applicant. No subdivision is proposed.</p>
<b>Clause 3.10.4.3 Development Requirements</b>	
<p>a) Development shall not exceed 9 metres in height above natural ground level, except where —</p> <p>(i) A Structure Plan specifies otherwise, in which case the height limit specified by the Structure Plan shall apply; or</p> <p>(ii) The local government considers that particular circumstances warrant an exception being made and provided the objectives of the Tourism zone are not compromised.</p>	<p><b>Compliant.</b></p> <p>The elevations demonstrate low-profile buildings with a range of heights that do not exceed 9 metres in height, as follows (from south to north):</p> <ul style="list-style-type: none"> <li>• RL10.6m – 5.9m = 4.7m height (wellness pavilion)</li> <li>• RL12.45m – 8.6m = 3.85m height (pool suite and club suites 1 and 2)</li> <li>• RL13.05m-9.2m = 3.85m height (deluxe suites through to managers quarters)</li> <li>• RL10.5m-6.5m = 4m height (workers accommodation)</li> </ul>
<p>b) In considering an application for development approval the local government will, pursuant to clause 67 of the deemed provisions, have regard to the following —</p>	<p><b>Compliant.</b></p> <p>Having regard to the matters contained in clause 67 of the deemed provisions, the proposed development is considered appropriate in</p>

Scheme Requirement	Compliance
<ul style="list-style-type: none"> <li>(i) The colour and texture of external building materials, the local government may require the building facade and side walls to a building depth of 3 metres to be constructed in masonry and/or glass material or similar;</li> <li>(ii) Building size, height, bulk, roof pitch;</li> <li>(iii) Setback and location of the building on its lot;</li> <li>(iv) Architectural style and design details of the building;</li> <li>(v) Function of the building;</li> <li>(vi) Relationship to surrounding development; and</li> <li>(vii) Other characteristics considered by the local government to be relevant</li> </ul>	<p>relation to the proposed colour and textures, built form (scale, height and bulk), setbacks, functionality, and relationship to the golf course.</p>
<p>c) Landscaping shall be provided to complement the appearance of the proposed development. The local government shall require a landscaping plan to be submitted and approved prior to commencement of development</p>	<p><b>Compliant.</b></p> <p>The Landscaping Plan Design and Management Plan is provided in <b>Appendix C</b>. The approach to the landscaping design has been informed by the site's natural features, climate, and ecological setting, seeking to enhance the visitor experience and meet the functional needs of the development.</p>
<p>d) All development shall be in accordance with the local government's adopted colour palette.</p>	<p><b>Compliant.</b></p> <p>The proposed colours and materials are consistent with the Shires LPP1, described further in section 4.5.1.</p>
<p>e) The local government may approve permanent residential accommodation as part of a tourist development that involves</p> <ul style="list-style-type: none"> <li>(i) A new tourist development; or</li> <li>(ii) A substantial refurbishment of an existing tourist development,</li> </ul> <p>provided that the predominant use of the site remains for short-term accommodation and other tourism uses, and provides for a high-quality tourism outcome or tourism benefit.</p>	<p><b>Not Applicable.</b></p> <p>Permanent residential development is not proposed as part of the development application.</p>
<p>f) Tourist development shall comply with the minimum and average lot sizes as per the R40 Density Code.</p>	<p><b>Not applicable.</b></p> <p>The subject site is Crown Land and is leased to the applicant. No subdivision is proposed.</p> <p>Nine accommodation units are proposed on the subject site, which has a land area of 5.185ha. Dividing the subject site by the number of units, this roughly equates to 5,760 square metres per unit. This reflects the low-impact design approach of the proposal.</p>

## 4.5 Local Planning Policies

### 4.5.1 Local Planning Policy 1 – Colour Palette for Developments

The Shire's *Local Planning Policy 1 (LPP1) – Colour Palette for Developments* states that all proposed developments are to have due regard to the colour palette.

The proposed materials are aimed at ensuring the proposed development sits as part of the coastal landscape. The proposal responds by using locally sourced materials, including rammed earth walls and crushed-limestone which reflects the sandy, low-glare tones of the natural dune systems and the wider Gulf foreshore

The proposal results in a colour palette that generally reflects the 'Classic Cream', 'Dune', 'Surf Mist' and 'Paperbark' colours listed in the policy as demonstrated by the proposed development materials illustrated in **Figure 8** and in the renders provided in **Appendix B**.



Figure 8 Proposed Development Materials

# 5.0

## Conclusion

# 5.0 Conclusion

This Development Application seeks approval for a 'Tourist Development' comprising nine (9) short-stay accommodation units with associated on-site facilities and amenities, located on Crown Lot 510 on Deposited Plan 427828, Kerry Graham Road, Exmouth.

The proponent has worked collaboratively with the Shire to progress key pre-requisite approvals, including successful approval of a Crown Land Lease and Scheme Amendment Request (SA11), culminating in this application. The proposal reflects a well-considered and low-impact development that has evolved over a three-year process of planning and engagement.

The development seeks to address a clear shortfall in high-end, nature-based accommodation in the region, offering a boutique visitor experience that is environmentally responsive and sensitive to the surrounding landscape aligned with the State and local planning frameworks and Shire's strategic tourism and land use objectives:

- Eco-sensitive design with minimal land disturbance;
- Integration of renewable energy systems;
- Use of sustainable materials and conservation-oriented landscaping;
- Local economic participation, through construction and ongoing operations in partnership with Exmouth-based businesses.

We trust the enclosed plans and supporting documentation provide sufficient detail to support the Shire's assessment and the Development Assessment Panel's favourable determination.



# Appendix A

Shire of Exmouth Development Application Form,  
DAP Form1, DPLH Landowner Consent and  
Certificate of Crown Land Title



# Appendix B

Development Plans & Elevations



# Appendix C

## Landscape Management Plan and Design



# Appendix D

## Transport Impact Statement



# Appendix E

## Environmental Management Plan



# Appendix F

## Bushfire Management Plan



# Appendix G

## Waste Management Plan



# Appendix H

## Stormwater Management Plan



# Appendix I

## Flood Management Plan



# Appendix J

Line of Sight Modelling

