

**Chief Executive Officer**

Shire of Moora  
34 Padbury Street  
Moora WA 6510



**Bradley Manns**  
74 Melbourne Street  
Moora WA 6510  
Phone: 0499 254 714  
12 October 2026

**RE: Formal Request for Reconsideration – Refusal of Application to Keep Four Dogs at 74 Melbourne Street, Moora**

Dear Chief Executive Officer,

I am writing in response to Council's correspondence dated 5 October 2026, advising of the decision to refuse my application for approval to keep four dogs at my residential property at 74 Melbourne Street, Moora.

While I acknowledge and respect Council's responsibilities under the *Dog Act 1976* and the *Shire of Moora Dogs Local Law 2016*, I respectfully request that Council reconsider its decision in light of the circumstances surrounding my application, particularly the current shortage of rental accommodation in Moora and the compassionate reasons that have resulted in four dogs residing at my property.

I understand that Council must consider the welfare of animals, the amenity of neighbouring properties and the responsible management of dogs within residential areas. However, I believe the individual circumstances of my application warrant further consideration, and I would appreciate the opportunity to address each of the concerns outlined in Council's response.

**1. Exceptional Circumstances and the Shortage of Rental Accommodation in Moora**

I would first like to clarify the circumstances that have resulted in four dogs residing at my property, as I believe this information is particularly relevant to Council's consideration of my application.

**I own two dogs, and my housemate independently owns two dogs. Both of us owned our respective animals before we began sharing accommodation.**

Due to the significant shortage of available rental properties within Moora, my housemate has been unable to secure suitable independent accommodation and has had little alternative but to reside with me. I agreed to provide accommodation to assist someone experiencing genuine housing difficulties within our local community. As a consequence, our two existing households have come together under one roof, resulting in four dogs residing at the property.

I wish to emphasise that neither my housemate nor I have deliberately acquired additional dogs. We have simply continued caring for the companion animals we each owned prior to this living arrangement. The situation has arisen out of necessity rather than a deliberate intention to exceed the Shire's permitted number of dogs.

I respectfully ask Council to recognise the distinction between a household intentionally acquiring additional animals and two existing dog owners being required to share accommodation because of circumstances largely beyond their control. The shortage of rental accommodation within regional communities such as Moora can place significant pressure on individuals attempting to secure stable housing. My decision to accommodate my housemate was made in good faith and with the intention of assisting someone experiencing these difficulties.

I believe this is an important circumstance that deserves consideration when assessing the merits of an exemption.

**2. Potential Impact on Neighbourhood Amenity**

Council has expressed concern that permitting four dogs at the property may create unnecessary risks to the quiet enjoyment and amenity of neighbouring residents. I fully acknowledge the importance of maintaining a peaceful residential environment and recognise my responsibility to ensure that the dogs do not cause a nuisance.

**However, I respectfully ask Council to clarify whether these concerns are based on documented complaints or incidents associated with the dogs at my property, or whether they relate to the potential impact of four dogs generally.** My original application provided detailed information regarding the property and the measures implemented to ensure the dogs are appropriately managed.

- The property comprises approximately 836 m<sup>2</sup> of securely fenced land, providing a substantial outdoor area for the dogs.
- In addition to the yard, the elevated design of the dwelling provides a large sheltered area beneath the house, offering protection from the sun, rain and adverse weather conditions.
- I have also provided a purpose-built insulated dog shelter constructed from a 1,000-litre pod, ensuring the animals have access to appropriate shelter throughout the year.
- The dogs receive regular exercise, interaction and supervision, and fresh drinking water is available at all times.
- Both my housemate and I understand our responsibilities as dog owners and are committed to ensuring that barking, hygiene, containment and general behaviour are managed appropriately.
- Animal waste is removed regularly, fencing and gates are maintained, and the dogs are supervised to minimise any potential disturbance.
- I believe the property's size, layout and existing facilities provide a suitable environment for the four dogs without adversely affecting neighbouring residents.

I would welcome an inspection by an authorised Shire officer to assess the property, fencing, shelter and management arrangements firsthand. Should Council identify any specific concerns, I am willing to discuss practical measures to address them.

### **3. Concerns Regarding an Unlimited Exemption**

Council has indicated that my original application sought approval for an unlimited period. I understand that Council may have reservations about granting an exemption without defined conditions or limitations. To address this concern, I am willing to amend my original request and propose that any approval be conditional and apply only to the four dogs currently residing at the property.

Given that the situation has arisen because my housemate has been unable to secure alternative rental accommodation, I respectfully propose that Council consider an exemption for the duration of our shared living arrangement, subject to reasonable conditions and periodic review.

Under this proposal:

- The exemption would apply only to the four existing dogs identified in my original application.
- No additional dogs would be acquired while the number of dogs at the property exceeds the ordinary permitted limit.
- Should my housemate secure alternative accommodation and relocate with their two dogs, the property would return to the standard two-dog limit.
- Both owners would remain responsible for the registration, identification, care and management of their respective dogs.
- Council could impose reasonable conditions relating to fencing, hygiene, noise management and animal welfare.
- The exemption could be reviewed after an agreed period to ensure continued compliance.

Alternatively, should Council consider it more appropriate, I would be willing to discuss an exemption limited to the natural lives of the four existing dogs, with no replacement animals permitted while the number exceeds the ordinary limit.

I believe these options offer practical compromises that address Council's concerns regarding an unlimited exemption while recognising the circumstances that have resulted in the current living arrangement.

### **4. Concerns Regarding the Kelpie Breed**

Council has identified that one of the dogs is a Kelpie and has raised concerns regarding the breed's high energy levels and traditional working characteristics. I acknowledge that Kelpies are generally active and intelligent dogs that require appropriate physical exercise and mental stimulation. However, I respectfully submit that breed characteristics alone do not necessarily determine whether an individual dog is suitable for a residential environment. The Kelpie identified in my original application, Titi, is a two-year-old companion animal and is not kept for working, breeding or commercial purposes. As previously outlined, the dogs receive regular exercise, interaction and opportunities for stimulation.

The property also provides a generous, enclosed yard in which the animals can move freely, together with substantial shaded areas and suitable shelter. I understand the importance of meeting the needs of active breeds and am committed to ensuring that Titi receives appropriate exercise, supervision and care.

I respectfully request that Council consider the individual circumstances of the dog, including its living environment and management arrangements, rather than relying solely on general breed characteristics. I would welcome an opportunity for an authorised officer to assess the dogs and their living conditions if Council considers this appropriate.

### **5. Absence of an Underlying Humane Basis**

Council has stated that my application does not have an underlying humane basis. I respectfully disagree that the circumstances of my application are without compassionate merit and request that Council reconsider this assessment. As explained, my housemate has been unable to obtain suitable independent accommodation due to the shortage of rental properties in Moora. By allowing my housemate to reside with me, I have provided practical assistance to someone facing housing difficulties within our community. Importantly, we each owned two dogs before this arrangement commenced. Neither of us has increased the number of animals we personally own. Requiring the household to reduce the number of dogs to two would potentially mean that one or both of us would be forced to surrender or rehome companion animals that we owned prior to sharing accommodation. These dogs are established members of our respective households and provide companionship, emotional comfort and stability. Forcing the separation or rehoming of existing companion animals because two individuals have been required to share accommodation due to a local housing shortage would be a distressing outcome.

I understand that emotional attachment to animals does not automatically establish grounds for an exemption. However, I respectfully submit that the circumstances surrounding this application extend beyond ordinary pet ownership preferences.

This is not a situation in which additional dogs have been acquired simply because we wish to keep more animals. Rather, it is the consequence of providing accommodation to someone who has been unable to secure housing elsewhere.

I believe these circumstances provide a genuine basis for compassionate consideration, particularly where the animals can be appropriately cared for and reasonable conditions can be implemented to protect neighbouring residents. I respectfully ask Council to consider whether requiring the removal of two existing companion animals is a proportionate response when a conditional exemption may provide a practical alternative.

My intention in providing accommodation to my housemate was to assist someone in need, not to circumvent Council's regulations.

I hope Council will recognise the compassionate circumstances underlying this application and consider an outcome that balances the requirements of the local laws with the realities of housing availability within our community.

### **6. Commitment to Responsible Dog Ownership**

I wish to reassure Council that both my housemate and I take our responsibilities as dog owners seriously.

We are committed to maintaining appropriate standards of animal welfare, property hygiene, secure containment and consideration for neighbouring residents. I am willing to cooperate with Council in implementing reasonable conditions that may assist in addressing any concerns associated with the exemption.

These could include:

- A property inspection to assess fencing, shelter and available space.
- Confirmation that all dogs are appropriately registered and microchipped.
- Verification of relevant veterinary and vaccination records.
- Compliance with any applicable sterilisation requirements.
- Continued management of barking, hygiene and containment.
- A review of the exemption after an agreed period.
- A commitment that no additional or replacement dogs will be acquired while the property exceeds the standard permitted limit.
- Neighbourhood statements regarding my dogs behaviour as a general.

I believe these measures would provide Council with reassurance that the animals can be managed responsibly while allowing our existing companion animals to remain in their established home.

## **7. Request for Extension of the Compliance Period**

Council's correspondence dated 5 October 2026 advises that I have 30 days to reduce the number of dogs at the property to two. Given that I am formally requesting reconsideration of the decision and providing additional information regarding the circumstances of my application, I respectfully request an extension of this compliance period while Council reviews my submission. I understand that requesting reconsideration does not automatically suspend the requirement to comply with the Shire's direction.

I therefore seek written confirmation that Council will consider extending the compliance deadline pending a further decision. I would appreciate the opportunity to have these additional circumstances properly considered before being required to make arrangements that may result in the permanent separation or rehoming of existing companion animals.

## **Conclusion**

I respectfully request that Council reconsider its decision to refuse my application to keep four dogs at 74 Melbourne Street, Moora. I acknowledge Council's responsibility to administer the relevant legislation and local laws and recognise the importance of maintaining appropriate standards of animal welfare and neighbourhood amenity. However, I believe the circumstances of my application are exceptional and warrant individual consideration.

**The presence of four dogs at my property is not the result of irresponsible pet ownership or a deliberate decision to acquire additional animals. It is the direct consequence of two existing dog owners sharing accommodation because of the shortage of available rental housing in Moora.**

My housemate and I each owned two dogs prior to living together, and we are simply seeking an opportunity to continue caring for our existing companion animals while maintaining a stable living arrangement. I respectfully ask Council to consider the compassionate circumstances surrounding this situation and whether a conditional exemption, subject to reasonable requirements and review, would provide a fair and practical outcome.

I am willing to meet with Council representatives, arrange a property inspection or provide any further information that may assist in reconsidering this application.

I would also appreciate written clarification of the process available for reconsideration or review of Council's decision, together with confirmation regarding my request for an extension of the compliance period.

Thank you for taking the time to consider this submission. I sincerely hope that a reasonable and compassionate resolution can be reached that respects Council's responsibilities while recognising the genuine housing difficulties that have led to this situation.

Yours faithfully,

**Bradley Manns**

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