

City of Greater Geraldton
South Greenough to Cape Burney Coastal Planning Strategy
Schedule of Submissions

Submission No. & Date Received	Submitter & Affected Property	Nature of Submission	Comment	Recommendation
1 (23/01/13)	Consultant on behalf of private landowner	Support is given as it is considered the Coastal Planning Strategy (CPS) supports development of the subject land as an important day use and tourism node known as Flat Rocks.		Note Submission
		<u>Concept Plan:</u> A concept plan has been prepared for the lots generally based on the Greenough Flats and Walkaway Land Use Strategy – Flat Rocks Structure Plan. It is considered that the concept plan generally accords with the CPS recommendations for the subject land.	Whilst the concept plan provided embraces (to some degree) the principles of the Coastal Planning Strategy, it is not supported by any site specific justification or technical reports.	Note Submission Advise proponent that endorsement of the Coastal Planning Strategy is not to be construed as support or approval for the concept plan.
		<u>Planning Precincts:</u> The concept plan proposes development of a mixture of uses including Rural Smallholdings, Mixed Use (Commercial/Tourism) and therefore the proposed uses of 'Medium scale Tourism' and 'Rural Smallholdings' at Flat Rocks is supported. The subject land is located in both the Dunes and Coastal planning precincts. The CPS acknowledges this and therefor it is intended that the boundaries of the precincts be flexible to allow for consideration on the merits of an application rather than being a hard line of separation. This recommendation is supported.		Note Submission
		<u>Potential Subdivision:</u> The concept plan proposes lots within proximity to Flat Rocks to be developed into Rural Smallholding lots being a minimum lot size of 4 hectares. It is considered that 4 hectares allows for conservation of the sand dunes and an alternative residential lifestyle option and therefore this recommendation within the CPS is supported.		Note Submission

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1 continued		<p><u>Tourist Development:</u></p> <p>The CPS identifies areas within the subject land as 'Major Coastal Node' (Flat Rocks) and 3 'Minor Day Use Nodes' (The Spot, Dhus Rocks and Twomeys).</p> <p>The CPS acknowledges the current facilities at Flat Rocks and that "overnight accommodation of a low to medium scale could potentially be developed in the immediate Flat Rocks vicinity". This recommendation is supported as the concept plan proposes tourism sites adjacent to the Flat Rocks day use area.</p> <p>However, it is noted that the CPS states that minor day use nodes are to provide a lower level of facilities and access. The concept plan indicates the potential for some small-scale tourism opportunities to operate in conjunction with these minor use nodes, particularly with respect to the Aquaculture opportunities at Twomeys. Therefore it is requested that the wording of section 2.2.4 in the CPS be amended to state:</p> <p style="padding-left: 40px;">In some locations, low scale parking, ablutions, shelters and other tourism orientated infrastructure may be appropriate.</p>	<p>The existing aquaculture licence does offer potential for some related tourism opportunities.</p> <p>However these opportunities should be kept to a low-scale in keeping with the recommendations for the 'Minor Day Use' nodes.</p>	<p>Uphold Submission</p> <p>Reword section 2.2.4 (last sentence of 1st paragraph) to include: other low-scale tourism orientated infrastructure may be appropriate</p>
		<p><u>Aquaculture Opportunities:</u></p> <p>The landowner currently holds licences to undertake abalone aquaculture in the southern portion of Lot 2864. The CPS does not make reference or directions to provide for Aquaculture opportunities in the CPS. Given the existing licence, we request that aquaculture (at Twomeys) be added to the list of permitted uses within the Dune System planning precinct.</p>	<p>Aquaculture is a discretionary use under the current "Rural" zoning of the land and thus should be reflected in the "Dune System Land Use Guidelines" of the CPS.</p>	<p>Uphold Submission</p> <p>Add the following dot point to section 2.3.3:</p> <ul style="list-style-type: none"> • Aquaculture (at Twomeys)

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1 continued		It is further considered that there may also be an opportunity to partner with the Batavia Coast Marine Institute at Durak Institute of Technology to develop a learning centre/demonstration building as part of the aquaculture use, and ask that this be reflected in potential development options for minor use nodes.	It is not considered appropriate that the CPS be modified at this stage based on potential partnerships especially as there is no current aquaculture industry occurring. Should the aquaculture use and partnership be seriously entertained then there would be opportunity to examine the merits of an application.	Dismiss Submission
2 (23/01/13)	Main Roads WA	<p>In general the strategies and advice recommended within the document is supported.</p> <p>The flood mapping indicates flood concerns in the area including around Brand Hwy, the document does not seem to highlight the importance of managing water within sites and where possible we feel that proponents, landowners and other stakeholders should be encouraged to improve the overall flood risk and water management in the area if the opportunity arises. Such an approach could be guided through this document, e.g. water storage/management across a number of privately owned sites.</p> <p>Support the approach that existing accesses into and through the area should be utilised to as great an extent as possible to avoid the need for new infrastructure development.</p> <p>Main Roads would resist the development of any new intersections along this stretch of the Brand Hwy. Document indicates development in the area would be limited in scale, it may still prove necessary for Main Roads to review the current intersection to the highway to ensure the number of vehicles wishing to access the area would be able to do so safely. We would appreciate being kept informed of any proposals in the area.</p>	<p>It is considered that these issues are not the primary responsibility of local government and rest more with the Department of Water. There is ample information provided in the flood mapping regarding floodplain management.</p> <p>The example provided of co-ordinating water management across a number of privately owned sites is not practical at this strategic level of document.</p> <p>All development applications involving access onto Brand Hwy are referred to Main Roads for comment.</p>	<p>Note Submission</p> <p>Dismiss Submission</p> <p>Note Submission</p>

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3 (25/01/13)	State Heritage Office	Supportive of the broad objectives to conserve and protect state and local heritage places within the Coast Planning Strategy (CPS). The Heritage Office is particularly supportive of the planning mechanism to balance development and conservation when heritage is affected by subdivision.		Note Submission
		Given the strategy has recognised the significance of heritage, it is suggested that the document make reference to State Planning Policy 3.5 Historic Heritage Conservation to support heritage policy measures when cultural heritage is affected from development.	The Strategy acknowledges the importance of providing a long-term, coordinated vision for land use planning in the area and has referenced a number of State Planning Policies and it is considered appropriate that State Planning Policy 3.5 Historic Heritage Conservation also be referenced.	Uphold Submission Under section 1.2.1 include reference to State Planning Policy 3.5 Historic Heritage Conservation
4 (25/01/13)	Private landowner	<p>The current format of the Coastal Planning Strategy (CPS) tends to miss the vital step of agreement on a board policy which should be embraced and agreed upon by the community before putting forward the plan to achieve the policy. It assumes a policy based on feedback and then amalgamates rules in accord with that presumed authority.</p> <p>Before imposing rules, an agreed character policy should be embraced and agreed upon by the community as the first step.</p> <p>We think that our view of the future overall character of the Batavia Coast is generally in accordance with the views of the author but the policy outlined in the CPS is confused and obfuscated by intertwining a set of inflexible rules however our ultimate view agrees with the CPS.</p>	<p>The development of the Strategy included substantial community and stakeholder engagement (including on-line surveys and website, community workshops, mail drop and newsletters) as outlined in section 1.4 of the document.</p> <p>The local vision was informed by the outcomes of the community engagement process and aligns with the broader vision of the City of Greater Geraldton in the 'Strategic Community Plan' and the '2029 and Beyond Community Charter'.</p> <p>The Strategy needs to provide a level of direction and guidance on land use, development and subdivision. The document is flexible and allows for consideration of the merits of an application where assessment and determination can be guided by the vision and objectives of the Strategy.</p>	Dismiss Submission

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4 continued		<p>Our broad view of what the character policy should perhaps look like is:</p> <p><i>The Batavia Coastline is unique and should allow for maximum public access to the beachfront with the minimum disruption to the dune system.</i></p> <p><i>The area behind the Dune system is rich in history, is valuable for primary production and is subject to flooding which needs to be taken into account in any development.</i></p>	<p>The character policy is noted, however the local vision was informed by the outcomes of the community engagement process and aligns with the broader vision of the City of Greater Geraldton in the 'Strategic Community Plan' and the '2029 and Beyond Community Charter'.</p>	Note Submission
		<p><u>Access:</u></p> <p>Access to major and minor coastal nodes should be direct as possible to the Brand Hwy and unless there are dedicated and well-formed public roads available, tracks through the dune should be discouraged. Accordingly, with the exception of well-established marked tracks, as much as possible lateral 4WD traffic should be restricted to or near the beachfront.</p>	<p>Access issues are addressed in sections 1.5.6 and 2.2.5 of the Strategy.</p>	Note Submission
		<p><u>Positive Impact of Existing Development:</u></p> <p>An area that we may have potential difference of agreement is the development of the Dunal System. Quite apart from being detrimental to the system, subdivision has significantly reduced the level of erosion. Private ownership and development has meant that, rather than numerous tracks through the dunes, the vehicles travel closer to the beach and it is obvious that the subdivisions have been a positive influence in restricting lateral multiple tracks through the dunes.</p>	<p>The Strategy promotes various forms of subdivision in the Dune System one of which is for conservation purposes and this requires issues such as access and coastal management to be addressed.</p> <p>The existing subdivision referred to would be akin to a conservation type of subdivision.</p>	Note Submission

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4 continued		<p>The Coastal Geomorphological report states that in some areas even the frontal dunes are considered a stable platform. Development in such areas does virtually eliminate traffic from that point back inland and in such areas approval of development, provided the ground conditions are significantly elevated and suitable, will effectively reduce or in fact eliminate lateral 4WD traffic.</p>	<p>The Strategy promotes various forms of development in the Dune System including development for conservation, low impact rural tourism and recreation purposes and provides guidelines on a number of issues including access (section 2.3.4).</p>	<p>Note Submission</p>
		<p><u>Access to remote Minor Nodes:</u></p> <p>The strategy clearly identifies the areas of Major and Minor nodes of significance but does not spell out a concept of how access will be overcome to remote areas, specifically those designated as Minor nodes.</p> <p>Mulloy Place road should be upgraded with parking at the end and inaccessible places like Headbutts, the Strategy should specify the alternatives of creating direct access from Brand Hwy or continuing with a track but adding signage to ensure only one track is used rather than multiple. Should areas be earmarked or considered for resumption to provide direct access there should be specified so that affected landowners are able to make proper representation and input.</p>	<p>The specific detailing of exact access locations is not practical at this strategic level of document. The Strategy does however provide guidance on access in sections 1.5.6 and 2.2.5.</p>	<p>Note Submission</p>
		<p><u>Proposed Farmlets:</u></p> <p>It is noted that Flat Rocks would be suitable for 4ha subdivisions. This would be very detrimental to the overall character of the area. The area is highly visible and elevated and such development would create an unappealing patchwork of properties that one might expect would be vacant for most of the year. The development on Company Road is a prime example of how this does not fit with the character of the coastline.</p>	<p>The Strategy states that the City MAY support subdivision for rural smallholdings at Flat Rocks where the lots proposed are not less than 4ha, subject to detailed structure planning and land capability/suitability assessments.</p> <p>This does not mean that a blanket 4ha subdivision would be approved but will be the subject of further detailed planning.</p>	<p>Dismiss Submission</p>

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4 continued		<p><u>Caravan Park:</u></p> <p>A better result would be achieved if an area in close proximity to Flat Rocks with almost direct access to the beachfront was reclassified to enable a caravan park and short term stay accommodation.</p>	<p>The Strategy promotes 'medium-scale tourism' at Flat Rocks which is defined as a range of tourist uses/development consistent with the rural ethos of the locality (e.g. café, caravan park, eco resort).</p>	<p>Note Submission</p>
		<p><u>Rules not Policy:</u></p> <p>The draft Strategy proposes a number of development criteria and rules.</p> <p>We strongly advise against specific rules at this stage until the City has firmly established an overall agreed character plan.</p> <p>Both Technical papers are excellent as a basis for developing an overall concept for the Batavia Coastline.</p> <p>The draft Strategy claims to be but is not in concert with these reports. It sets out specific guidelines that will tie the hands of the town planners responsible for implementation.</p>	<p>The WA Planning Commission in 2004 and again in 2010 identified the need for the development of a coastal strategy to address increasing development pressure. The strategy should cover strategic planning (including subdivision guidance).</p> <p>Additionally, there have been a number of decisions by the State Administrative Tribunal that have acknowledged the need for "<i>strategic plans and coastal management plans to distinguish those areas for conservation and those areas for low scale or more intensive residential development</i>".</p> <p>It is considered that the Strategy has provided the necessary level of direction and guidance on land use, development and subdivision in order to meet the above requirements.</p>	<p>Dismiss Submission</p>
		<p><u>Height Restrictions:</u></p> <p>A point of agreement is that developments should not visually dominate the skyline from a viewpoint of those travelling along Brand Hwy. The Strategy proposes a height restriction of 25m AHD (p29). As can be seen from the Visual Landscape Assessment report, many of the dunes reach a height of 40m above sea level. In fact, much of the proposed stable platform identified at Flat Rocks would be higher than 25m ADH and be precluded from development.</p>	<p>The Visual Landscape Assessment Report states the following:</p> <p><i>There are a number of design guidelines which apply to the entire study area. These are predominantly related to site clearing, built form mass, height and roofline and materials.</i></p>	<p>Uphold Submission</p> <p>Modify clause 2.3.4 f) and 2.3.8 b) to read as follows: Development should not detract from the identified key views in the Visual Landscape Assessment Report.</p>

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4 continued		<p>It would be far more beneficial for the Strategy to mealy state that developments in the dune system should not beak the skyline when viewed from Brand Hwy and if they do there should be compelling reasons why they would be in harmony with the overall character plan.</p>	<p><i>General</i></p> <ul style="list-style-type: none"> • <i>ensure there is minimal site disturbance.</i> • <i>retain select native vegetation.</i> • <i>built form to respond to natural topography.</i> • <i>minimise mass of buildings by variations in walls and roof lines.</i> • <i>ensure natural elements retain their dominance in the landscape through the height of built form. Where the elevation is up to 20m building height should not exceed 25m AHD. Where the elevation is above 20m AHD, ensure at least half of the dune face is visible above the built form. This is a general recommendation which requires additional site specific assessments of individual development applications to determine visual impacts. The aim is to ensure a variable height of dune face is the dominant visual feature.</i> <p>It is therefore considered appropriate that further clarification be included in the Strategy.</p>	<p><i>Development should also ensure that natural elements retain their dominance in the landscape through the height of built form.</i></p> <p>Add an additional point in clause 2.3.4 and 2.3.8 as follows:</p> <p><i>Buildings sited at high points of the dunes which interrupt the continuous natural dune skyline are discouraged. Where the elevation is up to 20m building height should not exceed 25m AHD. Where the elevation is above 20m AHD, ensure at least half of the dune face is visible above the built form. The aim is to ensure the variable height of the dune face is the dominant visual feature.</i></p>

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4 continued		<p><u>Subdivision Size:</u></p> <p>The draft Strategy proposes minimum subdivision sizes. Whilst this may be appropriate to some areas, it may not be to other areas. In some areas it is possible that the subdivision size should be well above the size stipulated and other areas may be suitable for subdivision of less than the stipulated size to achieve the policy outcomes. It really should not be a one size fits all approach.</p>	<p>The WA Planning Commission in 2004 and again in 2010 identified the need for the development of a coastal strategy to address increasing development pressure. The strategy should cover strategic planning (including subdivision guidance).</p> <p>The purpose of the Strategy is to provide a strategic planning framework that guides future decision-making about land use, development and subdivision.</p> <p>It is considered that the Strategy has provided the necessary level of direction and guidance on subdivision in order to meet the above requirements.</p> <p>However it should not be construed that the lot sizes indicated in the Strategy are a “one size fits all” and that blanket subdivision would be approved. Indeed the Strategy specifically state that Council <u>MAY</u> support subdivision. Section 2.1.2 of the Strategy outlines the guiding principles which will be used to inform decisions on subdivision.</p> <p>Additionally, the lot sizes proposed are consistent with those stated in the Local Rural Strategy. It would not be appropriate to have strategic planning documents with conflicting lot sizes.</p>	Dismiss Submission

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4 continued		<p>Wouldn't it be better for the private landowners to establish that a proposed building envelope meets with the draft Strategy that clearly sets out guidelines? For example, if the ultimate agreed Strategy was that development should occur in areas of stability, be visually harmony with the system and generally discourage lateral 4WD movement through the dune system, would it not encourage more meaningful development?</p>	<p>The Strategy provides clear guidance on land use planning and development. The development guidelines in the Strategy provide sufficient direction to ensure appropriate development.</p>	<p>Note Submission</p>
		<p><u>Firebreak Strategy:</u></p> <p>The draft Strategy should address the issue of firebreaks. Our understanding is that firebreaks must be made around the perimeter of privately owned properties, if a 4ha type subdivision be allowed; this would create a meaningless patchwork of firebreaks.</p> <p>Should the fire policy be the protection of manmade physical assets for the study area then perhaps the policy should concentrate on the provisions of suitable firebreaks around building envelopes or nodes of development.</p>	<p>Alternative firebreaks can be approved by the City.</p> <p>As part of the detailed planning for the subdivision at Westbank Road a Fire Management Plan that included the delineation of strategic firebreak network was undertaken.</p> <p>Details on fire management will be required with any subdivision, rezonings or development at identified nodes.</p>	<p>Dismiss Submission</p>
		<p><u>Minor Node Concept Plans:</u></p> <p>The draft Strategy does not provide any guidance or concept on Minor Nodes. Access is broadly addressed, but with the areas stipulated, solutions should be put forward. The Minor Nodes should have a concept plan similar to the Major Nodes outlining access, rubbish removal and facilities such as toilets and BBQ's. In time these areas will become as popular as the Major Nodes and it would be prudent to include at least the concept plan or outline interim measures in the Strategy.</p>	<p>Information and guidance on Minor Nodes is provided in Sections 1.2.2, 2.2.4 and 2.2.5.</p> <p>It is considered that this information is sufficient at present and when demand warrants and resources allocated more detailed planning can be undertaken.</p> <p>It should also be noted that private landowners as part of development and/or subdivision will be required to provide more detailed site plans.</p>	<p>Dismiss Submission</p>
5 (31/01/13)	Western Power	No objections.		Note Submission

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6 (18/02/13)	Department of Agriculture and Food	Overall DAFWA supports the contents of the draft strategy and management guidelines.		Note Submission
		<p>Suggestions to changes in Section 1.5.6 of the Strategy in order to improve the clarity of the text as follows:</p> <p><i>Agriculture</i></p> <p>The 'flats' are considered high quality agricultural land (Tille et al 2012) and it is preferable to direct non-agricultural land uses away from high quality agricultural land to poorer country.</p> <p>Grazing occurs on these soils the “flats” often as an adjunct to cropping. Livestock includes both sheep and cattle. Property owners also make use of the dune vegetation along the coastline. However, production on the poorer sandy soils of the dunes is low and the risk of wind erosion is high. However, production on these soils is low and the risk of wind erosion is high. As with dryland cropping, grazing is not viable on small lots.</p> <p><i>Horticulture</i></p> <p>The demand from investors trend in horticultural enterprises investment has been for larger property sizes with water and suitable soils and water. The subdivision of rural land into progressively smaller lot sizes reduce capacity and flexibility for diverse and viable agricultural production.</p>	Changes in the text are supported.	Uphold Submission Modify the Strategy text in accordance with the submission.

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6 continued		<p>The subdivision of rural land into progressively smaller lot sizes tends to destroy the capacities for diverse and viable agricultural production. Productivity correlates with soil type, climate and water availability; although many agricultural land uses do not require areas of productive land. The potential for diversity and total productive capacity is, nevertheless, enhanced by larger lot sizes.</p> <p>The Department of Agriculture and Food does not support further subdivision of rural zone lots for agricultural purposes as industry trends are towards larger production units. It does recognise the need for subdivision of land to meet overall needs of society where it conforms to an endorsed strategy or supports agricultural industry outcomes.</p>		
		<p>The text under Section 1.5.6 'Agriculture' refers to the risk of flooding to the 'flats' area. It is recommended that under Section 3.2 Management Recommendations, flood mitigation structures, particularly the levee bank (illustrated in the flood mapping data appendix C of the Strategy) receive ongoing maintenance to protect agricultural crops, land and infrastructure from flood damage.</p>	Changes in the text are supported.	<p>Uphold Submission</p> <p>Add the following dot point to section 3.2.1:</p> <ul style="list-style-type: none"> • Flood mitigation structures (particularly levee banks) should receive ongoing maintenance to protect agricultural crops, land and infrastructure from flood damage
7 (28/02/2013)	Water Corporation	The Water Corporation does not object to the strategy in principle.		Note Submission

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7 continued		<p>If the Corporation is requested to consider expanding the water scheme to service further development in the area a review of the water scheme planning shall be required.</p> <p>The fragmented nature of land ownership and patchy areas proposed for development in the strategy are likely to impact on the viability of extending the scheme.</p> <p>The Corporation is now not the exclusive water service provider. They are now required to act in accordance with prudent commercial principles and any agreement to be the service provider must be done so on commercial terms.</p>	<p>It would appear that any development that requires extension of the Water Corporation's water service will be marginal in terms of viability.</p> <p>This is especially relevant at the Flat Rocks Major Node and future developers will need to consider (and address) this aspect in any applications made.</p>	Note Submission
		It is expected that this Strategy would contain a District Water Management Strategy.	Given the limited and low-key nature of development a District Water Management Strategy is not considered to be required.	Dismiss Submission
8 (27/02/2013)	Private landowner	It is very disconcerting watching the likes of CGG seeking to impose regulatory impositions on private landowners when it has totally failed in its own obligation to manage the adjacent near coastal environment already under its control.	There is very limited land in the Strategy area that is in fact under the control of the City. The vast majority of the land near the coastal environment is in fact Unallocated Crown Land.	Dismiss Submission
		It is a sad fact that even to the casual observer it is very obvious that the coastal strip North and South of the city, presently under CGG's jurisdiction resembles a giant off road racetrack.	<p>The issue of off-road vehicles is noted, however any concerns with the current management regimes in place by the City need to be lodged with Council separately.</p> <p>It should also be noted that the Strategy provides guidance on managing access, which is not the sole responsibility of the City especially where the access is located on private land.</p>	Note Submission
		If that isn't bad enough there are no funds being set aside to address the issue but there always seems to be funding available to undertake strategies such as the one to which this submission refers.	The Strategy was prepared as a direct result of the WA Planning Commission in 2004 and again in 2010 identifying the need for the development of a coastal strategy to address increasing development pressure.	Dismiss Submission

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8 continued		<p>The CGG should also look at its own history before enacting this Draft Plan: the fact is the City of Geraldton is located on land no different to that being offered developmental restriction under this strategy.</p> <p>It is unacceptable that public environmental expectation has the capacity to limit the opportunity of free hold landowners without the offer of compensation or other offset provisions such as reduced council rates or tax incentives.</p>	<p>It is noted that historically the urban area of Geraldton was once a similar landscape to that of the Strategy area.</p> <p>The Strategy does not further limit any potential for development than what exists under the current zoning. In fact it does provide for subdivision and development opportunities not previously afforded under the current planning framework.</p>	Note Submission
		<p>The same goes for the fact that under this strategy it appears freehold land can be resumed for environmental/ reserve purposes without compensatory recourse.</p>	<p>The Strategy in no way suggests resuming land but rather requires foreshore reserves to be provided when a landowner choses to subdivide.</p>	Dismiss Submission
		<p>How do those charged with constructing this draft strategy reconcile the requirement to produce a fair and equitable outcome when those with no financial stake or investment in the area concerned have as much say as those who do?</p>	<p>The City is responsible for providing the strategic planning framework for the local government.</p> <p>The Strategy was prepared as a direct result of the WA Planning Commission in 2004 and again in 2010 identifying the need for the development of a coastal strategy to address increasing development pressure.</p>	Dismiss Submission
		<p>It is also my contention that the dollars spent by CGG undertaking this kind of strategy would be better used to manage their existing on ground obligation.</p>	<p>The Strategy provides the necessary strategic planning guidance for future land use, development and subdivision.</p> <p>In the absence of this planning guidance, decisions on resource expenditure would be made ad-hoc rather than being based on a sound planning framework.</p>	Note Submission

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8 continued		What is it that private enterprise might do in this location that would constitute a worse outcome for our fragile coastal environment than what is already being achieved by those presently charged with preserving it?	<p>As previously stated, those presently charged with preserving the coastal environment are predominantly the private landowners. There is very little foreshore reserve under the control of the City and the majority of the near foreshore area is Unallocated Crown Land.</p> <p>The Strategy provides the necessary strategic planning guidance for future land use, development and subdivision. It is considered that the direction provided in the Strategy benefits both the private and public in terms of appropriate development and management of the coastal environment.</p>	Dismiss Submission
9 (28/02/2013)	Department of Water	The use of the term Greenough River Mouth is consistent with previous documents, and is acceptable as a term to describe the actual exit point of the Greenough River Estuary. However there is no mention of the estuary throughout the document, which does not reflect the significance of the waterbody, as a conservation value wetland and an expression of groundwater, or the risks posed by future development to the estuary. It is recommended that Section 1.5.1 Hydrology is revised to include a description of the estuary, its regional significance as a recreational and ecological asset, and clear links provided to other relevant sections of the strategy e.g. 2.3.8 Coastal Plain Development Guidelines. The guidelines would also benefit from including specific provisions aimed at minimising risks to groundwater, recognising the interconnectedness of surface water and groundwater, and the Greenough River Estuary.	<p>The WA Planning Commission's Status of Coastal Planning in Western Australia (2010) states that a strategy covering the coast from the Greenough River mouth to Dongara is required to address increasing pressure. It should cover: foreshore reserve width; strategic planning (including subdivision guidance); management arrangements; and an assessment of conservation values, landform significance and recreational needs.</p> <p>It is considered that the level of information provided in the Strategy is sufficient to meet the above requirements.</p>	Dismiss Submission

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9 continued		<p>It is noted the State Planning Policy No. 2.6 State Coastal Planning Policy is listed and described in Section 1.2.1. State Planning. There is a need to actually address the requirements of the policy, and provide strategic direction, in relation to possible increases in inundation levels adjacent to the Greenough River Estuary and lower reaches of the Greenough River, specifically in relation to floodplain management. It is recommended that text be included in Section 1.5.1 Hydrology, or Section 1.5.4 Greenough River Mouth, which describes how increases in sea level will affect river flood levels in the estuary and river, and particularly of the likely risks to existing and future development from increased river flood levels occurring in conjunction with storm surges. It is pleasing to see the flood level maps included in the strategy, some contextual links to the maps within the body of the strategy would enhance the value of this information.</p>	<p>The WA Planning Commission in 2004 and again in 2010 identified the need for the development of a coastal strategy to address increasing development pressure.</p> <p>The purpose of the Strategy is to provide a strategic planning framework that guides future decision-making about land use, development and subdivision.</p> <p>It is not intended to specifically address inundation levels, floodplain management and the like.</p> <p>Information requested is best provided by the Department of Water themselves.</p>	Dismiss Submission
		<p>The Department of Water suggests that clear explanation is included in Section 2.3.6 of the flood risks to development on the Greenough River floodplain, and an additional map delineating the extent of the floodplain in the Coastal Plain, to assist in quickly identifying land subject to flood risks.</p>	<p>Appendix C contains adequate flood mapping produced by the Department of Water themselves.</p>	Dismiss Submission

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9 continued		<p>It is also suggested the wording of the management recommendations in Section 3.2.7 Water and Waste Management should be revised to reflect current State policy and the principles of integrated water cycle management. For example:</p> <p style="text-align: center;"><i>“Protect and enhance environmental, recreational and cultural values of natural water systems and their hydrological regimes”.</i></p> <p>It is important that clear distinction be made between waste and water management, in separate recommendations. If waste refers to wastewater, the latter term is preferable. The importance of managing contamination risks to groundwater from unsuitable approaches to wastewater disposal should also be reflected in the management recommendations.</p>	Changes in the text are supported.	<p>Uphold Submission</p> <p>Rename Section 3.2.7 as follows: <i>Water and Wastewater Management</i></p> <p>Add the following dot points to section 3.2.7:</p> <ul style="list-style-type: none"> • Protect and enhance environmental, recreational and cultural values of natural water systems and their hydrological regimes. • Manage contamination risks to groundwater from unsuitable approaches to wastewater disposal.

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10 (28/02/2013)	Private landowner	<p>Generally support the Strategy.</p> <p>Section 3.2.8 (page 36) of the Strategy, please consider adding:</p> <p><i>'Provide uniform and clear signage on maximum speed limit and what type of access (e.g. 4WD, pedestrian) is allowed and what not on beaches and other recreational areas within the strategy boundaries.'</i></p>	<p>Changes in the text are generally supported, but in Section 3.2.1 Land Use.</p>	<p>Note Submission</p> <p>Uphold Submission</p> <p>Add the following dot point to section 3.2.1:</p> <ul style="list-style-type: none"> • Provide signage containing information on access an appropriate usage of the area.
		<p>Inform local residents living in the Strategy area about ORV use and laws (e.g. distributions information folders and visits/surveillance of CGG Rangers). Increase policing and surveillance by CGG Rangers in coastal areas on ORV use.</p>	<p>The City is currently reviewing and updating its information on ORV use. Once completed this information will be available to the public.</p> <p>The issue of off-road vehicles is noted, however any concerns with the current management regimes in place by the City need to be lodged with Council separately.</p> <p>It should also be noted that the Strategy provides guidance on managing access, which is not the sole responsibility of the City especially where the access it is located on private land.</p>	<p>Note Submission</p>

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10 continued		<p>I've attached some photographs of development that is currently occurring in Westbank Estate.</p> <p>Is this CGG's idea of preserving visual amenity?</p> <p>Could CGG explain to me what is ecologically sustainable about his type of development?</p> <p>Is this type of development in accordance with the current City of Greater Geraldton Local Planning Scheme No. 5 (Greenough)?</p> <p>Who checks compliance with the current City of Greater Geraldton Local Planning Scheme No. 5 (Greenough)?</p> <p>Guidelines for Rural Development South of the Greenough River Mouth states that: <i>'a foreshore management should be undertaken where Rural Residential development is undertaken.'</i></p> <p>Which foreshore management plan is currently in place for Westbank Estate?'</p>	<p>The acceptance of the development is evidenced by its approval. It should be noted that there are some unauthorised development in the area that the City is currently taking action on.</p> <p>The 'development' of the entire Westbank Estate is considered acceptable as it has provided for a foreshore reserve, formalised beach access, strategic firebreaks and preservation of the dunes/vegetation.</p> <p>Approved development – Yes.</p> <p>The City has a Development Compliance Team.</p> <p>Westbank Estate was developed a number of years ago and foreshore management involved the creation and formalisation of beach access, protection of the foredune and creation of a foreshore reserve.</p>	Dismiss Submission

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10 continued		I support section 3.2.2 Built Environment, and would like to add that <i>native</i> vegetation screening is utilised.	Changes in the text are supported.	Uphold Submission Reword the 3 rd dot point in Section 3.2.2 as follows: <ul style="list-style-type: none"> • Utilise vegetation screening (preferably with local provenance species).
		Section 2.3.4 Dune System Development Guidelines, consider adding: <i>'Only approve further subdivision of stable rural residential land if:</i> <i>1. all blocks have suitable dwellings constructed that fit within the local environment and do not detract from visual amenity.</i> <i>2. blocks that do have inappropriate dwellings that do not fit in the local landscape (e.g. sheds, shedhouses and donga's) have established sufficient native vegetation that shields these dwelling from general view.'</i>	The matter of what is considered to be aesthetically pleasing is very subjective. One could indeed argue that 'shedhouses' are appropriate and reflect the rural character of the area.	Dismiss Submission

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11 (05/03/2013)	Consultant on behalf of private landowner	<p>We object to a number of elements of the Draft Strategy.</p> <p>In summary, the Draft Strategy proposes two major nodes; Lucy's Beach and Flat Rocks [in the coastal area of study]. The subject site immediately adjoins Lot 3 which has been identified as the future Lucy's Beach node. The Draft Strategy indicates that Flat Rocks may accommodate low to medium scale tourism development, whereas Lucy's Beach is not considered suitable for overnight accommodation.</p> <p>This lack of development flexibility at the Lucy's Beach node considerably reduces tourism opportunities and prevents the coastal area from providing a range of tourist experiences. One of the main objectives of the coastal strategy is to improve tourism and recreation in the area. This objective is unlikely to be achieved if the strategy limits the opportunity for a range of tourist experiences and accommodation options.</p>	<p>The local vision for the study area is:</p> <p><i>The community will continue to enjoy the unique landscape features and recreational opportunities the area has to offer by:</i></p> <ul style="list-style-type: none"> • <i>Ensuring preservation of key environmental attributes and ecosystem functions;</i> • <i>Providing more formalised access to the coast; and</i> • <i>Planning for sustainable, low-key development that complements existing natural, rural and built elements of the landscape.</i> <p>It is refuted that this vision will not be achieved if this particular development is not supported and indeed it is evident that that it is not in keeping with the vision.</p>	Dismiss Submission

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11 continued		<p><u>Previous decisions of Council:</u></p> <p>The City has previously considered development on the subject site. Indeed, our client lodged an application for a resort development on the subject site, which was presented to the City's 23 February 2005 Ordinary Council Meeting. The Council resolved that the development was not recommended until provision of additional information. Further consideration of the resort development would then be possible.</p> <p>The additional information required by the Council generally related to the land capability and was described as following (issues below). Our client has already taken significant steps to resolve these matters and provided a response to each issue (response below).</p>	<p>The Development Application has been <u>refused</u> by Council.</p> <p>The Council resolution states that the additional information is required for a possible scheme amendment application, which is a completely separate matter for Council to possibly consider.</p> <p>The application was assessed under the old Town Planning Scheme No. 4. Under the new Local Planning Scheme No. 5 (Greenough) a 'Motel' and 'Reception Centre' are both uses that are not permitted under the 'Rural' zone. Therefore any future application would require a scheme amendment, which is a totally separate matter for Council to possibly consider.</p> <p>It should also be noted that during the decision-making process a number of submissions were received objecting to the development.</p>	Note Submission

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11 continued		<p>Issue – Land capability</p> <p>Demonstration of the land capability and a management plan to ensure that dune preservation, land stability and vegetation conservation can be maintained;</p> <p>Response: A land capability assessment and associated management plan were prepared and submitted to the City demonstrating the suitability of the development on the subject site. The City's officers acknowledged the assessment presented information that was well substantiated and factual, but required more information in support of the development application.</p> <p>It is our opinion that the report provides sufficient detail to support the identification of the subject site as a Major Node.</p>	<p>The (then) Shire responded by letter dated 14 November 2005 and stated:</p> <p><i>From the site visit it was evident that the location of the proposed development was predominantly within a fragile land system dominated by a semi-stable or unstable dunal system and some deflation basins which have poor development potential and a moderate vegetation cover which is fragile.</i></p> <p><i>It is felt that the document as presented puts forward well-substantiated factual information but fails to fully address the requirements as contained within part 1 of Council's resolution. Whilst the issues raised within the resolution are commented on, it is considered that these comments are too broad and at times only superficial. Council would be looking for considerably more specific detail in relation to each of the issues raised within the resolution to ensure that the development is suited to this site.</i></p> <p>From the above it is evident that the report does not provide sufficient detail to support the identification of the subject site as a Major Node.</p>	Dismiss Submission
		<p>Issue – Road access</p> <p>Evidence of discussions with a consultant engineer/contractor to provide the necessary road connection to the proposed development;</p> <p>Response: Crowther Road was realigned and constructed to accommodate access to the subject site in a manner which minimised disruption to the dunes.</p>		Note Submission

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11 continued		<p>Issue – Water supply</p> <p>Evidence of discussions with the Water Corporation concerning the connection of the proposed development to reticulated scheme water supply;</p> <p>Response: The proponent has met with the Water Corporation who confirmed the subject site could be supplied via an extension of services from Brand Highway.</p>	<p>The Water Corporation has advised that the fragmented nature of land ownership and patchy areas proposed for development in the strategy are likely to impact on the viability of extending the water service scheme.</p> <p>The Corporation is now not the exclusive water service provider. They are now required to act in accordance with prudent commercial principles and any agreement to be the service provider must be done so on commercial terms.</p>	Note Submission
		<p>Issue – FESA</p> <p>Evidence of discussions with the Fire and Emergency Service Authority concerning a fire management plan for the proposed development and servicing of the site with fire hydrants;</p> <p>Response The proponent met with FESA who confirmed no fatal floors appeared to restrict the development of the site with respect to bushfire, and that development would need to meet the relevant guidelines.</p>	Obviously the development would need to meet the relevant guidelines, however no detail has been provided on how this particular development will meet those guidelines.	Note Submission
		<p>Issue – Effluent disposal</p> <p>Evidence of discussions with the Health Department concerning acceptable on-site effluent disposal systems;</p> <p>Response: The proponent met with the Department of Health. The outcome of the discussion was that the subject site would need to provide for on-site disposal in accordance with relevant standards and requirements.</p>	Obviously the development would need to meet the relevant standards and requirements, however no detail has been provided on how this particular development will meet those guidelines.	Note Submission

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11 continued		<p>Issue – Coastal manual</p> <p>Evidence of the development proposal having addressed the criteria and processes recommended in the Commonwealth Government’s ‘Coastal Tourism Manual for Sustainable Development’.</p> <p>Response: The purpose of the City’s Coastal Planning Strategy is to provide a framework which should address the Commonwealth Government’s ‘Coastal Tourism Manual for Sustainable Development’. It is our opinion, as stated in this submission, that the subject site is suitable for a resort development.</p>	<p>The purpose of the Strategy is to provide a strategic planning framework that guides future decision-making about land use, development and subdivision. It is not the intended to address any specific issues related to this development proposal.</p> <p>The Batavia Coast Strategy does not encourage intensive development along this section of coast as it is likely to increase pressures and demands in an area that may be at risk.</p> <p>The Coastal Geomorphology technical report identifies broad structural components of the coast (sediment compartments). The subject land is located in Compartment 3 which is identified as the area of least potential for development and has unstable, mobile dunes.</p> <p>The Strategy clearly articulates a settlement and coastal tourism hierarchy and that all large scale, high impact tourist resort type development should be located in the urban settlement of Geraldton.</p>	Dismiss Submission

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11 continued		It is clear from the above responses that the proponent has provided a sufficient level of detail to give the City certainty that the subject site is capable of being developed for a resort type development.	<p>This argument is not supported and it must be noted that the development application has been <u>refused</u> by Council based on the poor land capability and the scale and intensity of the development.</p> <p>In any event the Council resolution states that the additional information is required for a possible scheme amendment application, which is a completely separate matter for Council to possibly consider.</p> <p>Clearly the development is not appropriate for the area given the findings of the Batavia Coast Strategy, the Coastal Geomorphology technical report and this Coastal Planning Strategy.</p>	Dismiss Submission
12 (08/03/2013)	Consultant on behalf of private landowner	<p><u>Flat Rocks Structure Plan:</u></p> <p>The Strategy acknowledges the 1997 Structure Plan proposal and suggests that it requires updating. Of particular importance are the references to topography and geomorphology of the tourism / recreation node and the considerable investment embodied in the document. Our client cannot speak for other land owners but she has been in dialogue with an adjoining major land owner, and we have been advised that the parties have agreed to cooperate and pursue a mutually acceptable and sustainable result for the area.</p> <p><u>Proposed Planning Precincts:</u></p> <p>The preferred development concept for our client's land proposes a mixture of uses including an Eco Tourism Village development and possibly some Rural Smallholdings. These uses fall generally under the proposed approved uses, 'Medium scale Tourism' and 'Rural Smallholdings' for Flat Rocks.</p>	<p>The City fully supports an integrated approach for the area.</p> <p>The uses proposed are generally supported by the Strategy.</p>	<p>Note Submission</p> <p>Note Submission</p>

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12 continued		<p><u>Landscape and Firebreak Vegetation Clearing:</u></p> <p>Natural land form and vegetation elements have been identified by visitor surveys and other studies as important to current and future users of the study area. Our client supports all strategic and regulatory measures embodied in the Strategy that prioritize the preservation of the area's unique coastal landscape.</p> <p>The integrity of the east face of the dunes in the vicinity of Flat Rocks Road is of particular importance to the future value of the tourism nodes for visitors and regional residents. If preserved visually they will set the standard for the entire future Flat Rocks development zone.</p>	<p>The Strategy (Section 1.5.5) acknowledges that the areas landscape and viewing experiences are significant at a regional and/or state level.</p>	<p>Note Submission</p>
		<p><u>Boundary Fence Scarring of Dunes:</u></p> <p>It has been noted in past studies and strategy plans, that substantial portions of the eastern dune face are unstable and vulnerable to blow out or sand movement.</p> <p>The City should ensure that adequate measures are taken to avoid any east west fence lines on property boundaries that transect the east face of the Dune System. Under current fire regulations every fence or property line must be protected by a 3m+ fire break and this regulation results in the potential for a 6 – 8m scar for each new east-west lot boundary fence.</p>	<p>Alternative firebreaks can be approved by the City.</p> <p>Details on fire management will be required with any subdivision, rezonings or development at identified nodes.</p>	<p>Note Submission</p>

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12 continued		<p><u>Potential Subdivision:</u></p> <p>We note that the current “Low Impact Rural Tourism” Local Planning Policy is proposed to apply to the Flat Rocks area in general and specifically to any new Structure Plan for the Flat Rocks Tourism Node and surroundings.</p> <p>We wonder if this policy could be revisited and revision considered so that the City and the Flat Rock’s land owners might arrive at a model sustainable development that avoids the very obvious potential for negative outcomes that are evidenced along the WA coast</p>	<p>The “Low Impact Rural Tourism” Local Planning Policy will not necessarily apply to a structure plan for Flat Rocks. It is envisaged that the land will be rezoned to the ‘Development’ zone and thus be governed by a structure plan.</p> <p>In any event it is the intention that “Low Impact Rural Tourism” be applied to rural land that also has conservation significance and the policy can be reviewed in due course.</p>	Note Submission
		<p><u>Definition of “Rural” and “Productive”:</u></p> <p>The starting point for this discussion should be the definition of “Rural”. The policy only applies to such land where the low impact tourist development would be incidental to the predominant agricultural land use.</p> <p>While some parts of the area may once have been grazed, this use has been discontinued for well over a decade and as such, the land cannot be described as “Rural” and cannot be considered to be “Productive” in a rural context.</p>	<p>It is the intention that “Low Impact Rural Tourism” be applied to rural land that also has conservation significance and the policy can be reviewed in due course.</p>	Note Submission

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12 continued		<p><u>Lot Size and Conformation:</u></p> <p>There is ample evidence that subdivision into 4ha + rural smallholding in other areas of WA coast has resulted in visual and environmental degradation as well as unmanageable fire risks to residents and scattered homesteads surrounded by highly flammable vegetation.</p> <p>Fence lines block the movement of larger fauna yet offer no barrier to vermin. Often poor management and owners activities result in the introduction of invasive species that add to fire loads and degrade the environment for native flora and fauna.</p>	<p>The Strategy states that the City MAY support subdivision for rural smallholdings at Flat Rocks where the lots proposed are not less than 4ha, subject to detailed structure planning and land capability/suitability assessments.</p> <p>This does not mean that a blanket 4ha subdivision would be approved but will be the subject of further detailed planning.</p>	Dismiss Submission
		<p><u>DEC and Native Vegetation Clearing:</u></p> <p>Of even greater concern is the regulatory conundrum that currently incentivizes land owners to progressively clear native vegetation.</p> <p>We see Flat Rocks as an opportunity to demonstrate a viable alternative to the current pattern of “clearing vegetation to save the farm”.</p>	<p>The issue is noted and a “viable alternative” at Flat Rocks is supported in principle, however the current Environmental Protection Act 1986 governs clearing.</p>	Note Submission

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12 continued		<p><u>Review of “Low Impact Rural Tourism”:</u></p> <p>The definition of ‘Rural Smallholdings’ in the Strategy clearly this signals a broadening of the scope of the “Low Impact Rural Tourism” policy but there remains some confusion regarding the rules that govern “conservation” land use under the Dune System precinct guidelines where far larger lots are recommended combined with restrictive covenants in order to ensure a meaningful outcome.</p> <p>The concept plan proposes lots within proximity to Flat Rocks to be developed into ‘Rural Smallholding’ lots being a minimum lot size of 4ha but we have discussed with our client a more flexible approach that permits clusters of residences and chalets with higher density that generate a village atmosphere.</p>	<p>The “Low Impact Rural Tourism” Local Planning Policy will not necessarily apply to a structure plan for Flat Rocks. It is envisaged that the land will be rezoned to the ‘Development’ zone and thus be governed by a structure plan.</p> <p>The clustering of development can be considered at the structure plan stage.</p>	Note Submission
		<p><u>Eco-Village Concept:</u></p> <p>An “Eco-Village” approach has the potential to minimize native vegetation clearing and carbon footprint per dwelling/occupant. In a location such as Flat Rocks, this approach enables the use of the combined “built form” to provide wind protection for residents and a more compact fire defence perimeter. Wind and fire are increasingly dominating the thinking of planners, architects and designers in areas where the prime attraction is proximity to natural bushland and wildlife.</p>	<p>The “eco-village” concept is supported in principle by the Strategy which has identified Flat Rocks for possible “Medium-Scale Tourism”, which includes possibly an eco-resort.</p>	Note Submission

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12 continued		<p><u>Water and Power:</u></p> <p>Flat Rocks is not serviced by mains water supply. We have advised our client that the compact “village” approach is particularly suited to areas that require a high level of autonomy from services. Water conservation, catchment and treatment will be required to harvest rain and our associates with possible involvement of Murdoch University are investigating the development of condensate harvesting technology that may help to supplement potable water supplies. Groundwater is reported to be adequate for ablutions and washing but reticulation costs can be minimized if buildings are clustered rather than scattered across the landscape.</p> <p>While power reticulation will be required, we would argue for on-site power generation using wind and/or photovoltaics. If adopted for the entire Flat Rocks development zone, the cost of providing reticulated power could be reduced substantially by downsizing capacity. Ideally our client would like to see all power underground.</p>	<p>Servicing issues will need to be addressed at the detailed planning stage however the concept of “self-sufficiency” for services is supported in principle.</p>	<p>Note Submission</p>
		<p><u>Roads:</u></p> <p>Cluster development can also result in a substantial reduction in road works and hence ongoing road maintenance cost. We are acutely aware of the need for the Flat Rocks development area to eventually be self-supporting so as to not become a drain on other ratepayers in the City.</p>	<p>Servicing issues will need to be addressed at the detailed planning stage however the concept of “self-sufficiency” for services is supported in principle.</p>	<p>Note Submission</p>

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12 continued		<p><u>Conservation:</u></p> <p>Most importantly the “Eco-Village” approach will enable developers to dedicate managed native vegetation areas that have visual and conservation integrity while ensuring that conditions for a critical mass of long term “caretaker” residents is maintained. This balance is not easy to achieve but it is critical to the success of the Flat Rocks development zone.</p>	<p>The Strategy (Section 3.1) has a management goal to ensure the preservation of key environmental attributes and ecosystem functions.</p>	<p>Note Submission</p>
		<p><u>Infrastructure Constraints:</u></p> <p>We are mindful that the City and WA Planning Commission do not wish to see a new “community” in the conventional sense materialize in the long term at Flat Rocks but we suggest that some social interaction will be a critical part of the future success of this unique coastal tourism node. Permanent residents can work with the City to assist the management and protection of the area. The unregulated use of off-road vehicles is of particular concern but the ability of volunteer fire fighters to report or contain fires is clearly of great importance in this high wind wilderness landscape.</p>	<p>Some level of permanent residences is acknowledged in Strategy by facilitating subdivision for conservation and rural smallholdings.</p>	<p>Note Submission</p>

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12 continued		<p><u>Strata Title:</u></p> <p>We note that the Strategy does not yet embrace or refer to the WA Planning Commission Tourism development policy as defined by the Bulletin 83.</p> <p>We further note that the City's "Low Impact Rural Tourism" policy states that strata subdivision of rural land on which tourism development is proposed or existing will not be supported.</p> <p>Given that the land embraced by the Flat Rocks Coastal Node no longer fits the criteria for, or definition of, productive land, we are keen to explore the opportunity to both stimulate and clarify policy that will catalyze investment in the concept we describe as an Eco Village.</p>	<p>The "Low Impact Rural Tourism" Local Planning Policy will not necessarily apply to a structure plan for Flat Rocks. It is envisaged that the land will be rezoned to the 'Development' zone and thus be governed by a structure plan.</p> <p>The strata titling of development can be considered at the structure plan stage.</p>	Note Submission
		<p><u>Tourism Development:</u></p> <p>We support the Strategy core objectives being:</p> <p><i>"planning, development and management will direct fishing, surfing, camping and other recreational activity towards coastal nodes".</i></p> <p><i>"overnight accommodation of a low to medium scale could potentially be developed in the immediate Flat Rocks vicinity."</i></p>		Note Submission

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12 continued		<p><u>Boat Launching:</u></p> <p>One of the identified minor nodes is closely associated with a proposed Aquaculture marine eco-tourism facility at Twomeys at the southern extremity of the Flat Rocks development zone. This section of beach has been favoured for generations by fishermen and boat owners because the outer reef provides protection from heavy swell.</p> <p>We believe that to succeed as a vibrant Tourism attraction and Coastal Node, Flat Rocks must have a boat launching and landing facility and we suggest that this possibility be investigated and discussed with other land owners.</p>	It is envisaged that boat launching issues will be addressed at the structure planning stage.	Note Submission
		We further note that the "Coastal Planning Strategy" draft does not yet provide any guidance with respect to Aquaculture.	Aquaculture is a discretionary use under the current "Rural" zoning of the land and thus should be reflected in the "Dune System Land Use Guidelines" of the CPS.	Uphold Submission Add the following dot point to section 2.3.3: <ul style="list-style-type: none"> • Aquaculture (at Twomeys)

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12 continued		<p><u>Camping and Short Stay Visitors:</u></p> <p>All the community studies and Tourism survey work to date shows that the area is currently used heavily by surfers and amateur fishers who visit for several hours or part of a day. This current use should not dictate the vision for the Flat Rocks Coastal Node and the surrounding development zone.</p> <p>Day trippers can contribute but they often bring negative impacts such as rubbish and damage to dune vegetation.</p> <p>Our client points out that encouraging day trippers with better facilities will not realize the potential for the area to become a quality tourism destination. The surf in the vicinity of Flat Rocks has been described as “world class” during the less windy months in late winter and spring.</p> <p>A “surf slum” standard of unregulated development will cost the community in the long run and yet the same surf resource has the potential to attract high tariff long stay visitation as has been demonstrated in the Margaret River / Yallingup region.</p> <p>Given the lack of protection from the wind offered by the terrain and vegetation, a conventional caravan park or camping ground approach will be very difficult to integrate into the Flat Rocks development zone without visually degrading the area’s attraction to non-surfers or those looking for more than a half day of surf or fishing.</p>	<p>Community attitudes and aspirations must be considered in any planning or development along the coastline, especially as the foreshore area will ultimately be community owned (Crown Land).</p> <p>Details of any caravan park will be addressed at the development/structure planning stage.</p>	Note Submission

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Schedule of Submissions

Submission No. & Date Received	Submitter & Affected Property	Nature of Submission	Comment	Recommendation
12 continued		<p><u>Summary:</u></p> <p>The Strategy is a long awaited and positive framework for the appropriate development of a vital and important recreational and tourism area.</p> <p>It is our hope that we can continue discussions with the City with a view maximizing the outcome for visitors and the local community who value this stretch of wilderness coastline. We see the Flat Rocks node as a rare opportunity to set a new benchmark for coastal development in WA.</p> <p>Our next objective is to discuss the matters raised with other land owners with a view to working professionally with all land owners and the City to craft an acceptable Structure Plan.</p>	The City welcomes early engagement in any proposals for the study area.	Note Submission
13 (13/03/13) Verbal Meeting	Geraldton-Greenough Rifle Club	Need for any development at Lucy's to be compatible with the Rifle Club and not impeded in any way the Club's continued operations.	<p>It must be noted that the identified 'Major Node' of Lucy's Beach is located on a reserve with the specific purpose of "Rifle Range".</p> <p>Without the Shooting Safety Template the Rifle Range is unable to operate. The City has previously experienced the lengthy, unpopular and problematic issues involved in rehousing noise emitting sporting facilities (e.g. motorcross) and it is considered appropriate that the Strategy make specific textual references to ensure the Rifle Club's long-term future is secured.</p>	<p>Uphold Submission</p> <p>Insert a new paragraph in Section 2.2.3 as follows: <i>Lucy's Beach is presently located on a Reserve 37333 which has the vested purpose of "Rifle Range".</i></p>

**City of Greater Geraldton
South Greenough to Cape Burney Coastal Planning Strategy
Schedule of Submissions**

Submission No. & Date Received	Submitter & Affected Property	Nature of Submission	Comment	Recommendation
13 continued				<i>The Geraldton-Greenough Rifle Club is located immediately to the north east and there is a need to protect the Shooting Safety Template. Therefore any land uses and/or development must not adversely affect the Rifle Club's ability to operate."</i>
14 (19/03/2013)	Department of Environment and Conservation	No comments on the Strategy.		Note Submission